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BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Approval
of Tribal Key Employee Finding of Suitability
Regarding:

ARRON NORTON

Respondent.

CGCC Case No. CGCC-2022-0811-12H

BGC Case No. BGC-HQ2022-00021SL

DECISION AND ORDER

Hearing Date: June 2, 2023
Time: 10:00 a.m.

This matter was heard by the California Gambling Control Commission (Commission) pursuant to Business and Professions Code sections 19870 and 19871, and Title 4, California Code of Regulations (CCR) section 12060, via Zoom video conference, on June 2, 2023.

Respondent Arron Norton (Norton) appeared on his own behalf during the evidentiary hearing.

Jeremy Stevens, Deputy Attorney General, State of California (DAG Stevens), represented complainant Yolanda Morrow, Director of the Bureau of Gambling Control (Bureau), Department of Justice, State of California.

During the evidentiary hearing, Presiding Officer Paras Modha (PO Modha), Attorney III of the Commission, took official notice of the following documents: the Commission’s Notice and Agenda of Commission Hearing; the Commission’s Conclusion of Prehearing Conference letter; the Commission’s Notice of Hearing with attachments (A) Norton’s Application for Finding of Suitability Tribal Key Employee, and (B) the Bureau’s Level III Tribal Key Employee Background Investigation Report; the Bureau’s Statement of Reasons; and Norton’s signed Notice of Defense form.

During the evidentiary hearing, PO Modha accepted into evidence Exhibits 1-3, Bates Nos. Complainant’s 0001-0179, offered by the Bureau and identified on the Bureau’s Evidentiary Hearing Exhibits Index, pursuant to a stipulation between the parties.

PO Modha also accepted into evidence Exhibit A, which consists of: (1) a letter of

1 reference from Christopher Clark, Director of Table Games at the Hard Rock Casino in
2 Cincinnati; and (2) a letter of reference from Rowell Felicitas, offered by Norton, pursuant to a
3 stipulation between the parties.

4 FINDINGS OF FACT

5 **Procedural History**

6 1. On or about August 10, 2020, Norton started working as a Table Games Supervisor
7 for the Viejas Casino and Resort (Viejas Casino).

8 2. On or about September 2, 2020, the Bureau received an Initial Application for Finding
9 of Suitability Tribal Key Employee and Supplemental Background Investigation Information
10 form (Supplemental) (collectively, Application) from Norton to work as a Table Games
11 Supervisor, a key employee position, at Viejas Casino. The Bureau issued Tribal Key Employee
12 Record No. TRKE-022326 to Norton.

13 3. On or about June 15, 2022, the Commission received a Level III Tribal Key Employee
14 Background Investigation Report (Background Report) on Norton from the Bureau. In the
15 Background Report, the Bureau states that Norton was convicted of two misdemeanor offenses,
16 and the circumstances that led to the convictions demonstrate that Norton is not a person of good
17 character, honesty, or integrity, and that Norton poses a threat to the interest of the state. Based on
18 the foregoing, the Bureau recommends that the Commission deny Norton's Application.

19 4. On or about August 11, 2022, the Commission voted to refer the consideration of
20 Norton's Application to a Gambling Control Act (Act) evidentiary hearing pursuant to CCR
21 sections 12060(a) and 12054(a)(4).

22 5. On or about August 12, 2022, the Commission sent a letter to Norton, via certified
23 and regular mail, notifying him that the Commission referred the consideration of his Application
24 to an evidentiary hearing and included a blank Notice of Defense form for Norton to complete
25 and return to the Commission.

26 6. On or about September 8, 2022, the Commission received a signed Notice of Defense
27 from Norton requesting an evidentiary hearing on the consideration of his Application. On his
28 Notice of Defense form, Norton also requested that all notices and written communications for

1 purposes of the evidentiary hearing be provided via e-mail instead of U.S. mail.

2 7. On or about October 21, 2022, the Commission sent a Notice of Hearing, via e-mail,
3 to Norton and DAG Stevens. The hearing was set for February 17, 2023 at 10:00 a.m. and a
4 prehearing conference was set for January 6, 2023 at 10:00 a.m.

5 8. On or about November 10, 2022, the Bureau sent a Statement of Reasons to Norton,
6 via e-mail, and to the Commission. In the Statement of Reasons, the Bureau states that Norton
7 was convicted of two misdemeanor offenses, and the facts and circumstances that led to the
8 convictions indicate that Norton is not a person of good character, honesty, or integrity, and that
9 his prior activities and criminal record demonstrate that he may pose a threat to the public interest
10 of the state and to the effective regulation and control of controlled gambling. Based on the
11 foregoing, the Bureau requests that the Commission deny Norton's Application.

12 9. On or about January 6, 2023, the noticed Prehearing Conference was held before
13 PO Modha. Norton attended on his own behalf. DAG Stevens attended on behalf of the Bureau.

14 10. On or about January 6, 2023, the Commission sent a Conclusion of Prehearing
15 Conference letter, via e-mail, to Norton and DAG Stevens.

16 11. On or about January 24, 2023, the Commission sent a Notice of Continued Hearing,
17 via e-mail, to Norton and DAG Stevens. The hearing was set for June 2, 2023 at 10:00 a.m.

18 12. The Commission heard this matter via Zoom video conference on June 2, 2023. PO
19 Modha closed the administrative record and the matter was submitted for decision on June 2,
20 2023.

21 **Norton's Employment History in Controlled Gambling**

22 13. Norton worked as a Dealer for Argosy Casino in Indiana from September 2010 to
23 February 2013.

24 14. Norton worked as a Table Games Supervisor for Horseshoe Casino in Ohio from
25 February 2013 to August 2015.

26 15. Norton worked as a Slot Attendant for Rising Star Casino in Indiana from August
27 2015 to December 2015.

28 16. Norton worked as a Dual Rate Supervisor for Hollywood Casino in Indiana from

1 December 2015 to November 2016.

2 17. Norton worked as a Table Games Supervisor for Red Rock Casino in Nevada from
3 December 2016 to August 2020.

4 18. On or about August 10, 2020 the Tribal Gaming Agency for Viejas Casino granted
5 Norton a two-year conditional license due to Norton's unsatisfactory credit. The conditional
6 license included several terms and conditions related to Norton's employment and addressing his
7 unsatisfactory credit. Norton has complied with the terms of the conditional license and has
8 worked as a Table Games Supervisor for Viejas Casino from August 2020 to the present.

9 19. There was no evidence presented of any derogatory information relating to Norton's
10 employment history in controlled gambling.

11 **Norton's Criminal History**

12 20. On or about December 20, 2006, Norton was convicted by the Boone County Circuit
13 Court in Kentucky, upon a plea of guilty, of the following: (1) violating Kentucky Revised
14 Statutes section 530.070(1)(d), unlawful transaction with a minor in the third degree, a
15 misdemeanor; and (2) violating Kentucky Revised Statutes section 525.070(1)(a), harassment
16 (physical contact) no injury, a misdemeanor, in the case *Commonwealth v. Norton*, Case Number
17 06-CR-00362. On or about January 18, 2008, Norton was sentenced to 12 months imprisonment
18 and two years of probation, and ordered to pay court costs. Norton's Motion for Probation was
19 granted and Norton's sentence was amended to 90 days in jail with work release.

20 **Norton's Application**

21 21. Norton's Application consists of two parts. The first part is three pages and requests
22 applicant information. Norton signed the first part of the Application on or about July 1, 2020.

23 22. The second part of the Application is the Supplemental, which is eight pages and
24 contains ten sections. The Supplemental requires that the applicant disclose, among other things,
25 their criminal history information.

26 23. Section (9) of the Supplemental requires an applicant to disclose their criminal history
27 information. Norton accurately checked the box marked "yes" to the question "Have you ever
28 been **convicted** of a crime, pled guilty or plea of nolo contendere (no contest) to a crime?"

1 (Emphasis in original.) For each criminal conviction, the applicant is required to disclose the
2 approximate date of the conviction, the court location, and the crime for which the applicant was
3 convicted. On his Supplemental, Norton disclosed both of his misdemeanor convictions and
4 provided all of the required information. Norton also included the word “Stalking” to describe his
5 convictions even though it was not in the record of conviction. Norton also provided a statement
6 indicating the circumstances that led to the convictions.

7 24. Section (10) of the Supplemental is a Declaration, signed by Norton on or about
8 July 1, 2020, in which Norton declared under penalty of perjury that the information provided in
9 the Supplemental was “true, accurate, and complete.”

10 **Norton’s Communications with the Bureau**

11 25. In written responses to various inquiries from the Bureau, Norton explained in detail
12 the circumstances leading to his misdemeanor convictions. Norton also sent a copy of his plea
13 agreement to the Bureau.

14 **Melissa Avent’s Testimony During the Evidentiary Hearing**

15 26. Melissa Avent (Avent) is a Staff Services Manager I with the Bureau. During the
16 evidentiary hearing, Avent testified that she has worked for the Bureau for 17 years, including as
17 a Staff Services Manager I for ten years. Avent testified that she supervises nine employees that
18 conduct background investigations on tribal employees, including the analyst who conducted the
19 background investigation of Norton. Avent testified that she played a role in reviewing Norton’s
20 Application, conducting the background investigation, and preparing the Background Report.
21 Avent testified that the Bureau needs an applicant’s criminal history information to make a
22 recommendation on their application. Avent testified that the Bureau’s bases for recommending
23 the denial of Norton’s Application are Norton’s two misdemeanor convictions, and that the
24 circumstances that led to the convictions demonstrate that Norton is not a person of good
25 character, honesty, or integrity, and that Norton poses a threat to the interest of the state.

26 27. Regarding the specific application and background investigation process for Norton,
27 Avent testified that Norton disclosed his misdemeanor convictions on his Application and
28 provided a copy of his plea agreement to the Bureau. Avent also testified that Norton provided

1 responses to the Bureau's several requests for additional information.

2 **Norton's Testimony During the Evidentiary Hearing**

3 28. During the evidentiary hearing, Norton testified in detail regarding his two
4 misdemeanor convictions, including the factual circumstances leading to the convictions. Norton
5 acknowledged that he made a tremendous mistake and testified that he regrets the incidents
6 leading to the convictions, that he should have known better, and that he does not defend his
7 actions.

8 29. Norton testified that he disclosed his two misdemeanor convictions to Viejas Casino,
9 the Bureau, and the Commission, and that he has no prior or subsequent criminal convictions.

10 30. Norton testified that has been licensed to work in controlled gambling in three other
11 states (Nevada, Indiana, and Ohio), that his work history is excellent, and that he has had no
12 write-ups during his lengthy career in controlled gambling. Norton also testified that he has been
13 promoted at work and received an award certificate for training people at work.

14 **Sandy Ortmeier's Testimony During the Evidentiary Hearing**

15 31. Sandy Ortmeier (Ortmeier) is the Licensing Manager of the Viejas Gaming
16 Commission and has worked there for 28 years. During the evidentiary hearing, Ortmeier testified
17 that she took a lot of things into consideration when she ran a background check on Norton and
18 Norton's criminal history revealed two misdemeanor convictions. Ortmeier testified that Norton
19 was truthful on his license application, that the convictions were beyond ten years from the date
20 of his application, that he is licensed by other states, and that there was no other criminal history.
21 Ortmeier testified that Norton was issued a conditional license with a list of criteria and that
22 Norton met those conditions. Ortmeier testified that Norton has excelled at his position, does
23 everything asked of him, and has not received any write-ups. Ortmeier also testified that Norton is
24 well-liked and well-respected by peers and management, is a good employee and mentor, and is
25 never late. Ortmeier requested that the Commission approve Norton's Application.

26 **Norton's Letters of Reference**

27 32. Christopher Clark (Clark), Director of Table Games at the Hard Rock Casino in
28 Cincinnati, provided a letter of reference in support of Norton's Application on or about January

1 16, 2022. Clark states that he has had the privilege of working with, supervising, and managing
2 Norton, and that he cannot recall ever having a bad interaction. Clark states that Norton was an
3 honest and hardworking team member, has a wealth of experience and gaming knowledge, and
4 has respect for policies for procedures. Clark also states that Norton is fun, outgoing, and is a
5 talented and experienced dealer.

6 33. Sandi Ortmeier (Ortmeier), Licensing Manager for the Viejas Gaming Commission,
7 provided a letter of reference in support of Norton's Application on or about June 8, 2022.
8 Ortmeier states that Norton's license application was complete and that he fully disclosed his two
9 misdemeanor convictions. Ortmeier states that Norton is compliant with the terms of his
10 conditional license, has improved his credit, and that there have been no verbal or disciplinary
11 actions in his file. Ortmeier also states that Norton has been cooperative and prompt when
12 responding to the Bureau's correspondence and questions.

13 34. Rowell Felicitas (Felicitas) provided a letter of reference in support of Norton's
14 Application on or about January 17, 2023. Felcitas states that he has known Norton since 2020 in
15 both a professional and personal capacity. Felicitas states that Norton is sincere, honest,
16 trustworthy, hard-working, diligent, and a person with high moral and ethical standards. Felicitas
17 also states that Norton pays attention to detail, listens to his fellow team members, and always
18 goes out of his way to help others succeed.

19 Assessment of Norton's Suitability for Licensure

20 35. For the reasons provided below, the Commission finds that Norton has met his burden
21 of proving his suitability for licensure. Therefore, Norton's Application is approved.

22 *Norton provided information required by the Act*

23 36. All of the information requested on an application has been considered through the
24 legislative and regulatory processes and determined necessary in order for the Commission to
25 discharge its duties properly. An applicant is neither expected, nor permitted, to determine the
26 importance of the information requested, and instead is required to provide true, accurate, and
27 complete information as requested. To address any issues in completing the application, and to
28 ensure that the information disclosed on an application is "true, accurate, and complete," the

1 burden is on the applicant to carefully and thoroughly read the application, and to seek assistance
2 with filling out the application if necessary. The applicant is responsible for both the information
3 they disclose, and for failing to disclose required information, on the application. The applicant
4 maintains this burden even if the applicant does not understand, misreads, or misinterprets a
5 question on the application.

6 37. On his Supplemental, Norton accurately checked the box marked “yes” to the question
7 “Have you ever been **convicted** of a crime, pled guilty or plea of nolo contendere (no
8 contest) to a crime?” (Emphasis in original.) For each criminal conviction, Norton was
9 required to disclose the approximate date of the conviction, the court location, and the
10 crime for which he was convicted. Norton disclosed and provided the required
11 information for his misdemeanor convictions on the Supplemental.

12 *Norton revealed facts material to qualification*

13 38. The existence of, and details regarding, an applicant’s criminal history are facts
14 material to the qualification for licensure of an applicant. For instance, they may affect the
15 assessment of the applicant’s general character, honesty, integrity, and/or ability to participate in
16 controlled gambling. They may lead to a finding that the issuance of a license to such an applicant
17 would be inimical to public health, safety, or welfare, or undermine public trust that the gambling
18 operations with respect to which the license would be issued are free from criminal and dishonest
19 elements, and would be conducted honestly. An applicant’s criminal record may be sufficient to
20 support a factual finding and legal conclusion that the applicant poses a threat to the public
21 interest of this state, to the effective regulation and control of controlled gambling, or creates or
22 enhances the dangers of unsuitable, unfair, or illegal practices, methods, and activities in the
23 conduct of controlled gambling or in the carrying on of the business and financial arrangements
24 thereto. Finally, the existence of, and details regarding, an applicant’s criminal convictions may
25 reveal that the applicant is disqualified from licensure for conviction of a certain felony or a
26 misdemeanor involving dishonesty and/or moral turpitude.

27 39. Norton revealed his complete criminal history. On his Supplemental, Norton disclosed
28 both of his misdemeanor convictions from 2006 and provided all of the required information.

1 Norton also included the word “Stalking” to describe one of his convictions even though it was
2 not in the record of conviction. Norton also provided a statement describing the circumstances
3 that led to the convictions.

4 *Norton met his burden under the Act*

5 40. An applicant demonstrates good character, honesty, and integrity by providing
6 truthful, accurate, and complete responses on their Application and Supplemental, in response to
7 Bureau inquiries during the Bureau’s background investigation, and while testifying during the
8 evidentiary hearing. An applicant demonstrates good character and integrity by complying with
9 the law. An applicant also demonstrates good character and integrity by accepting responsibility
10 for their actions and demonstrating rehabilitation from past criminal behavior.

11 41. Conversely, an applicant demonstrates a lack of good character, honesty, and integrity
12 by omitting pertinent information, and providing untrue, misleading, and/or contradictory
13 information on their Application and Supplemental, in response to Bureau inquiries, and while
14 testifying during the evidentiary hearing. An applicant demonstrates a lack of good character and
15 integrity by failing to comply with the law, particularly with regard to repeated or egregious
16 criminal actions. An applicant also demonstrates a lack of good character and integrity by failing
17 to take responsibility for their actions and continuing with a pattern of criminal behavior.

18 42. Norton was convicted of two misdemeanor convictions: unlawful transaction with a
19 minor in the third degree and harassment (physical contact) no injury. These convictions occurred
20 on or about December 20, 2006. Norton’s convictions reflect poorly on his character and
21 integrity. Not unreasonably, the Bureau’s bases for recommending the denial of Norton’s
22 Application are Norton’s two misdemeanor convictions, and the circumstances that led to the
23 convictions.

24 43. However, there are a number of factors that support a finding that Norton currently
25 has the requisite good character, honesty, and integrity to receive a finding of suitability. Norton
26 accurately disclosed both of his misdemeanor convictions on his Application and on his
27 application with Viejas Casino. Norton provided details regarding the misdemeanor convictions
28 in writing to the Bureau and voluntarily provided a copy of his plea agreement to the Bureau.

1 Norton was cooperative and responded to Bureau inquiries throughout the application process.
2 Norton testified in detail regarding his misdemeanor convictions and the factual circumstances
3 that led to them during the evidentiary hearing, and his testimony was credible. Norton
4 acknowledged that he made a tremendous mistake and testified that he regrets the incidents
5 leading to the convictions, that he should have known better, and that he does not defend his
6 actions. Additionally, since 2006 Norton has not suffered any criminal convictions.

7 44. Norton submitted three letters of reference emphasizing that he does not pose a threat
8 to the public interest of this state, or to the effective regulation and control of controlled
9 gambling, or create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and
10 activities in the conduct of controlled gambling.

11 45. Ortmeier, Licensing Manager for the Viejas Gaming Commission, took the time to
12 attend the hearing and testify on Norton's behalf. Ortmeier fully supports Norton's Application.

13 46. Norton testified that he has been licensed to work in controlled gambling in three other
14 states (Nevada, Indiana, and Ohio), that his work history is excellent, and that he has had no
15 write-ups during his lengthy career in controlled gambling. Norton also testified that he has been
16 promoted at work and received an award certificate for training people at work. Finally, there was
17 evidence presented that Norton has had an excellent work history in controlled gambling since
18 2010.

19 47. Based on the foregoing, Norton has met his burden of demonstrating that he is a
20 person of good character, honesty, and integrity. Also, Norton has met his burden of
21 demonstrating that he is a person whose prior activities, criminal record, if any, reputation, habits,
22 and associations do not pose a threat to the public interest of this state, or to the effective
23 regulation and control of controlled gambling, or create or enhance the dangers of unsuitable,
24 unfair, or illegal practices, methods, and activities in the conduct of controlled gambling.

25 48. All documentary and testimonial evidence submitted by the parties that is not
26 specifically addressed in this Decision and Order was considered but not used by the Commission
27 in making its determination on Norton's Application.

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1 LEGAL CONCLUSIONS

2 *Applicable Statutes and Regulations*

3 49. Every Gaming Employee shall obtain, and thereafter maintain current, a valid tribal
4 gaming license, which shall be subject to biennial renewal. Tribal-State Compact between the
5 State of California and the Viejas Band of Kumeyaay Indians section 6.4.3(a).

6 50. Except as provided in subdivision (e), the Tribe will not employ or continue
7 to employ, any person whose application to the State Gaming Agency for a determination of
8 suitability, or for a renewal of such a determination, has been denied or has expired without
9 renewal. Tribal-State Compact between the State of California and the Chukchansi Indians
10 sections 6.4.3(d).

11 51. The Tribal Gaming Agency shall require the applicant also to file an application with
12 the State Gaming Agency, prior to issuance of a temporary or permanent tribal gaming license,
13 for a determination of suitability for licensure under the Gambling Control Act. Investigation and
14 disposition of that application shall be governed entirely by State law, and the State Gaming
15 Agency shall determine whether the Applicant would be found suitable for licensure in a
16 gambling establishment subject to that State Gaming Agency's jurisdiction. Tribal-State Compact
17 between the State of California and the Chukchansi Indians section 6.5.6.

18 52. The Act is an exercise of the police power of the state for the protection of the health,
19 safety, and welfare of the people of the State of California, and shall be liberally construed to
20 effectuate those purposes. Business and Professions Code section 19971.

21 53. Public trust that permissible gambling will not endanger public health, safety, or
22 welfare requires that comprehensive measures be enacted to ensure that gambling is free from
23 criminal and corruptive elements, that it is conducted honestly and competitively, and that it is
24 conducted in suitable locations. Business and Professions Code section 19801(g).

25 54. "Finding of suitability" means a finding that a person meets the qualification criteria
26 described in subdivisions (a) and (b) of Section 19857, and that the person would not be
27 disqualified from holding a state gambling license on any of the grounds specified in Section
28 19859. Business and Professions Code section 19805(j).

1 55. The Commission has the responsibility of assuring that licenses, approvals, and
2 permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose
3 operations are conducted in a manner that is inimical to the public health, safety, or welfare.
4 Business and Professions Code section 19823(a)(1).

5 56. An “unqualified person” means a person who is found to be unqualified pursuant to
6 the criteria set forth in Section 19857, and “disqualified person” means a person who is found to
7 be disqualified pursuant to the criteria set forth in Section 19859. Business and Professions Code
8 section 19823(b).

9 57. The Commission shall have all powers necessary and proper to enable it fully and
10 effectually to carry out the policies and purposes of this chapter. Business and Professions Code
11 section 19824.

12 58. The Commission has the power to deny any application for a license, permit, or
13 approval for any cause deemed reasonable by the Commission. Business and Professions Code
14 section 19824(b).

15 59. The Commission has the power to take actions deemed to be reasonable to ensure that
16 no ineligible, unqualified, disqualified, or unsuitable persons are associated with controlled
17 gambling activities. Business and Professions Code section 19824(d).

18 60. The burden of proving his or her qualifications to receive any license from the
19 Commission is on the applicant. Business and Professions Code section 19856(a) and CCR
20 section 12060(j).

21 61. No gambling license shall be issued unless, based on all of the information and
22 documents submitted, the Commission is satisfied that the applicant is a person of good character,
23 honesty, and integrity. Business and Professions Code section 19857(a).

24 62. No gambling license shall be issued unless, based on all of the information and
25 documents submitted, the Commission is satisfied that the applicant is a person whose prior
26 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the
27 public interest of this state, or to the effective regulation and control of controlled gambling, or
28 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in

1 the conduct of controlled gambling or in the carrying on of the business and financial
2 arrangements incidental thereto. Business and Professions Code section 19857(b).

3 63. The Commission shall deny a license to any applicant who is disqualified for failure of
4 the applicant to provide information, documentation, and assurances required by this chapter or
5 requested by the chief, or failure of the applicant to reveal any fact material to qualification, or the
6 supplying of information that is untrue or misleading as to a material fact pertaining to the
7 qualification criteria. Business and Professions Code section 19859(b).

8 *Assessment of Norton's Suitability for Licensure*

9 64. In connection with this criminal convictions Norton provided information required by
10 the Act, and revealed facts material to qualification. As a result, the Commission finds that
11 Norton's Application is not subject to denial pursuant to Business and Professions Code section
12 19859(b).

13 65. Norton met his burden of proving that he is not disqualified from licensure.
14 Therefore, Norton is not disqualified from licensure pursuant to any of the other provisions of
15 Business and Professions Code section 19859.

16 66. Norton met his burden of proving that he is a person of good character, honesty, and
17 integrity. Therefore, Norton is qualified for licensure pursuant to Business and Professions Code
18 section 19857(a).

19 67. Norton met his burden of proving that his prior activities, criminal record, if any,
20 reputation, habits, and associations do not pose a threat to the public interest of this state, or to the
21 effective regulation and control of controlled gambling, or create or enhance the dangers of
22 unsuitable, unfair, or illegal practices, methods, and activities in the conduct of controlled
23 gambling or in the carrying on of the business and financial arrangements incidental thereto.
24 Therefore, Norton is qualified for licensure pursuant to Business and Professions Code section
25 19857(b).

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ORDER

1. Arron Norton’s Application for Tribal Key Employee Finding of Suitability is APPROVED.

2. No costs are awarded.

3. Each side to pay its own attorneys’ fees.

This Order is effective on August 10, 2023.

Dated: 8/10/2023 Signature: 
DocuSigned by: 38D0AB38C651466...

Paula LaBrie, Chair

Dated: 8/10/2023 Signature: 
DocuSigned by: 3D1DB086F9274AA...

Cathleen Galgiani, Commissioner

Dated: 8/10/2023 Signature: 
DocuSigned by: 14B4AD3B90F8462...

Edward Yee, Commissioner

Dated: 8/10/2023 Signature: 
DocuSigned by: 7722F4571120449...

William Liu, Commissioner