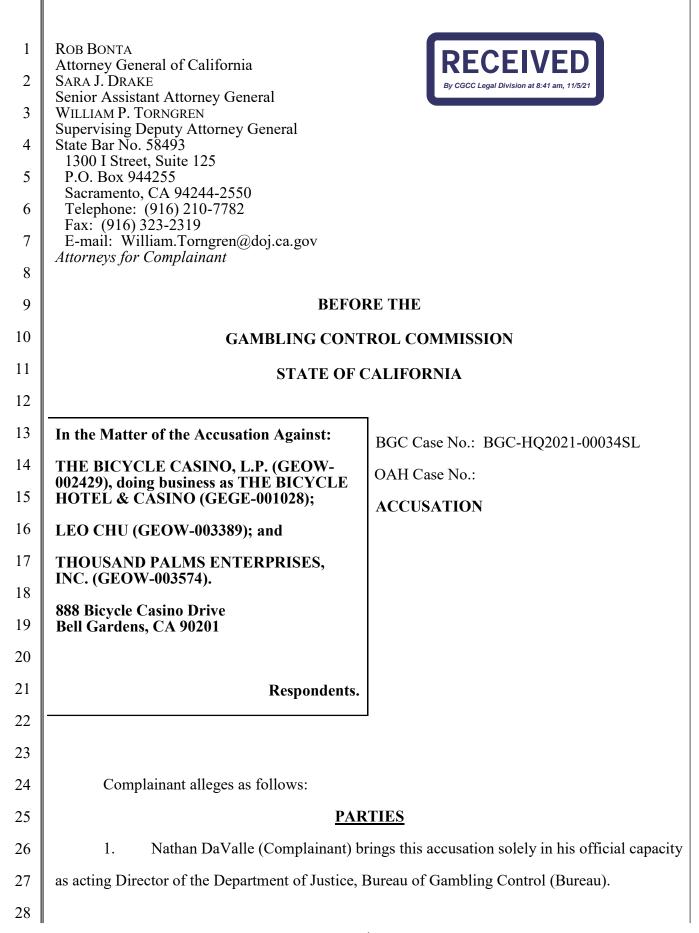
The Commission is providing a copy of this pleading (Accusation, or Statement of Reasons, Statement of Particulars, or Statement of Issues) so the public is as informed as possible of pending administrative proceedings regarding the allegations contained in the pleading. An Accusation, Statement of Issues, Statement of Reasons, or Statement of Particulars is simply an allegation of facts that, if true, may rise to the level of disciplinary action against or denial of a license, registration, work permit, or finding of suitability. The facts contained in the pleadings should not be taken as established or proven. The licensee/applicant will have an opportunity to dispute the allegations in a formal administrative proceeding.

ROL COMMIS



2. Respondent The Bicycle Casino, L.P. (Limited Partnership), license number GEOW-002429, is a limited partnership, doing business as The Bicycle Hotel & Casino (Casino). Respondents Leo Chu, license number GEOW-003389, and Thousand Palms Enterprises, Inc., license number GEOW-003574, (collectively, General Partners) are the Limited Partnership's general partners. Collectively, the Limited Partnership and the General Partners are referred to as "Respondents" in this accusation. Each Respondent is endorsed on the Casino's license pursuant to Business and Professions Code section 19851, subdivision (b).

SUMMARY OF THE CASE

3. California's public policy, as expressly provided in the Gambling Control Act (Act) (Bus. & Prof. Code, § 19800 et seq.), is to require all card rooms be operated in a manner suitable to protect the public health, safety, and general welfare of the state's residents. (Bus. & Prof. Code, § 19920.) Accordingly, the Act is to be liberally construed to effectuate those purposes. (Bus. & Prof. Code, § 19971.) This proceeding arises out of Respondents' longstanding, admitted willful blindness to their obligations to protect the public health, safety, and general welfare of California residents. Respondents persistently used, or tolerated, unsuitable methods of operation by failing to timely and fully comply with incident reporting requirements, failing to implement an adequate anti-money laundering program, and providing false cash transaction reports under the Bank Secrecy Act (BSA).² This enhanced the danger of unsuitable, unfair, or illegal practices in connection with controlled gambling. Respondents' acts and omissions make their licenses subject to discipline, including, among other things, the maximum monetary penalties or fines allowed by statute or regulation and, if the California Gambling Control Commission (Commission) deems appropriate, revocation.

26 Appendix A.

² The BSA is codified at title 12 United States Code sections 1829b and 1951 through 1959 and at title 31 United States Code sections 5311 through 5314 and 5316 through 5332. Regulations implementing the BSA appear at title 31 Code of Federal Regulations chapter X.

¹ The statutes and regulations applicable to this accusation are quoted in pertinent part in

JURISDICTION AND COST RECOVERY

- 4. The Commission has jurisdiction over the operation and concentration of gambling establishments and all persons and things having to do with the operation of gambling establishments. (Bus. & Prof. Code, § 19811, subd. (b).) The Act tasks the Bureau with, among other responsibilities, investigating suspected violations of the Act and initiating disciplinary actions. (Bus. & Prof. Code, §§ 19826, subds. (c) & (e) & 19930, subd. (b).) Upon the Bureau filing an accusation, the Commission proceeds under Government Code section 11500 et seq. (Bus. & Prof Code, § 19930, subd. (b); see Cal. Code Regs., tit. 4, § 12554, subd. (a).) The Commission's disciplinary powers include, among other things, revocation and imposition of a fine or monetary penalty. (Cal. Code Regs., tit. 4, § 12554, subd. (d).)
- 5. In a matter involving revocation or denial of a license by an administrative law judge, the Bureau may recover its costs of investigation and prosecuting the proceeding. (Bus. & Prof. Code, § 19930, subd. (d).)

STANDARD OF PROOF

6. In a proceeding under the Act, the standard of proof is the preponderance of the evidence, which "is such evidence as when considered and compared with that opposed to it, has more convincing force, and produces a belief in the mind of the fact-finder that what is sought to be proved is more likely true than not true." (Cal. Code Regs., tit. 4, § 12554, subd. (c).)

THE CASINO'S HISTORY

- 7. The Casino currently is a 125-table card room located in Bell Gardens, California. Before the COVID pandemic, the Commission licensed the Casino for 185 tables. The Casino is the second largest card room in the state in number of tables and is either the second or third largest in gross gambling revenues. The Casino is Bell Gardens' largest single source of revenue, representing over 40 percent of the city's General Fund operating revenue.
- 8. The Casino first opened in November 1984. In 1987, the United States alleged in a criminal action that the Casino was funded with monies derived from violations of the Racketeer Influenced and Corrupt Organizations Act and was used to launder money. On April 1990, the United States seized the Casino and took over its operation.

9. In 1996, the United States sold its ownership interest in the Casino. The Limited Partnership has owned and operated the Casino after the sale.

THE CASINO'S ADMISSIONS

- 10. In April 2017, based in part on information gathered by the Bureau, the United States executed a search warrant on the Casino. From then until October 27, 2021, the United States investigated the Casino. The Bureau assisted the United States, deferring any administrative proceeding until the United States completed its criminal processes.
- 11. On October 27, 2021, the Limited Partnership entered into a non-prosecution agreement with the United States Attorney's Office for the Central District of California. As part of that agreement, the Limited Partnership made the following admissions, among others:
 - a. The Casino is required to report transactions involving more than \$10,000 in currency by a Currency Transaction Report (CTR). Each CTR is to record accurately the identity of the person or entity on whose behalf the currency transaction was conducted.
 - b. The Casino is required to report by a Suspicious Activity Report (SAR) transactions involving at least \$5,000 in funds that the Casino knew, suspected, or had reason to suspect the transaction, among other things, involved illegal activity or was designed to evade regulations promulgated under the BSA.
 - c. The Casino is required to develop, implement, and maintain an effective antimoney laundering program.
 - d. The role of the house in the Casino's so-called "California Asian games" is filled by a licensed third-party entity against which other players wager.
 - e. Person A, a Chinese national, was a "high roller" who regularly patronized the Casino in 2016. He was accompanied frequently by an associate, Person B. Person A requested, and generally was afforded, the opportunity to play in a "VIP" room. Person A was a frequent patron of the Casino, visiting approximately 100 times between January 2016 and August 2016.

- f. Person A conducted large cash transactions during his visits to the Casino, including transporting cash into and out of the Casino using duffle bags. On occasion, he exchanged more than \$1 million in cash for chips.
- g. When conducting cash transactions, Person B cashed in or cashed out on Person A's behalf. Even though Casino employees knew or should have known these transactions were conducted on Person A's behalf, all CTRs filed by the Casino for Person A's transactions from January 7, 2016, through July 27, 2016, were in Person B's name without reference to Person A. These transactions totaled over \$100 million. During that same time, the Casino filed no SARs for Person A.
- h. On January 22, 2016, the United States publicly announced the Normandie Casino agreed to plead guilty to criminal violations of the BSA. The Casino took action to alert its employees and undertook to reevaluate its policies and procedures to avoid submitting CTRs for persons other than the gamblers responsible for the transactions. In March 2016, the Casino updated its anti-money laundering training to discuss proper reporting of transactions involving more than one person.
- i. On July 15, 2016, the Financial Crimes Enforcement Network (FinCEN) announced a settlement with Hawaiian Gardens Casino. On July 26, 2016, the Casino's management discussed the Hawaiian Gardens settlement. The Limited Partnership represented to the United States Attorney's Office for the Central District that before then, senior management had not been aware that Person B was conducting cash transactions on Person A's behalf.
- j. After learning of settlements with other Los Angeles area card rooms, the Limited
 Partnership determined to take actions to prevent similar enforcement actions.
- 12. In making the admissions, the Limited Partnership established that it and the General Partners used, or tolerated, unsuitable methods of operation by failing to implement an adequate anti-money laundering program, providing false CTRs, and failing to file SARs. The Limited Partnership admitted that it and the General Partners did not start to take any appropriate

action with respect to anti-money laundering and BSA compliance until the Normandie Casino guilty plea in January 2016.

RESPONDENTS' DISREGARD OF PRIOR PROCEEDINGS

- 13. In not taking action on anti-money laundering and BSA compliance between
 January 22, 2016, and July 26, 2016, Respondents allowed the Casino to file more than 140 false
 CTRs. Moreover, the Normandie Casino guilty plea was not the first BSA or anti-money
 laundering proceeding involving a California card room. Rather, Respondents overlooked or
 neglected to consider or were willfully blind to the following events that potentially impacted the
 Casino's operations and compliance with the BSA and anti-money laundering program
 requirements:
 - a. In March 2011, the Bureau filed an accusation against The Oaks Card Club, a 40-table card room located in Emeryville. An emergency order shutting down the card room accompanied the accusation. As one ground for seeking discipline, the Bureau alleged that the card room failed to comply with the BSA by, among other things, failing to take information from a person associated with a gambler. In May 2011, the Bureau reached a settlement that the Commission approved in which the card room immediately paid \$575,000 in fines and costs. The settlement expressly required special training regarding the BSA.
 - b. In March 2011, the Bureau filed an accusation against Artichoke Joe's Casino, a 51-table card room located in San Bruno. An emergency order shutting down the card room accompanied the accusation. As one ground for seeking discipline, the Bureau alleged that the card room failed to comply with the BSA by failing to obtain information necessary for a CTR. In May 2011, the Bureau reached a settlement that the Commission approved in which the card room immediately paid \$575,000 in fines and costs. The settlement expressly required special training regarding the BSA.
 - c. In October 2013, the Bureau filed an accusation against Normandie Casino, a 60-table card room located in Gardena. The alleged grounds for discipline and license

- revocation included, among others, transaction structuring in violation of the BSA and failure to file CTRs with respect to a patron, who won in excess of \$2.5 million.
- d. At its November 21, 2013 meeting, the Commission imposed conditions on Normandie Casino's state gambling license requiring a compliance committee that, among other tasks, was to review CTRs and SARs.
- e. In December 2015, FinCEN announced a settlement with The Oaks Card Club for a \$650,000 fine based on BSA reporting violations through May 2011.
- f. In December 2015, the United States charged the Palomar Card Club, an 11-table card room in San Diego, with a money laundering conspiracy and the failure to maintain a reasonably designed anti-money laundering program. In connection with its indictment, the United States seized the card room's player-bank accounts. The Bureau issued an emergency order shutting down the card room.
- g. In December 2015, the United States charged the Seven Mile Casino, a 20-table card room in Chula Vista, and its principal owner with the failure to maintain and implement an adequate anti-money laundering program. The Bureau issued an emergency order shutting down the card room.
- 14. In sum, between March 2011 and January 2016, Respondents apparently did not adjust or react, or elected to turn a blind eye, to events involving California's card rooms relating to BSA compliance and anti-money laundering programs. Those events included emergency orders shutting down card rooms, federal indictments, and a FinCEN assessment.

TOLERATION AND USE OF UNSUITABLE METHODS OF OPERATION

15. Respondents did not implement an effective anti-money laundering program. In the non-prosecution agreement, the Limited Partnership admits that the BSA required CTRs to record accurately the identity of the person or entity on whose behalf the currency transaction was conducted. An effective anti-money laundering program includes, among other things, the use of all available information to identify suspicious transactions. The Casino's program did not result in communications between floor managers, dealers, surveillance personnel, and cage employees,

THE CASINO'S DEFICIENT INCIDENT REPORTING

- 16. The Act requires full and true disclosure. (Bus. & Prof. Code, § 19866.)
 Regulations adopted by both the Commission and the Bureau require that owner licensees and key employees submit written reports to the Bureau within specified times. (Cal. Code Regs., tit. 4, § 12395, subd. (a)(3); Cal. Code Regs., tit. 11, § 2052, subd. (c).) The Casino's incident reporting was deficient and not compliant with the Commission's or the Bureau's regulations in the following ways, among others:
 - a. None of the Casino's owner licensees or key employees reported to the Bureau
 that the Casino failed to report currency transactions in accordance with the Penal
 Code or failed to fulfill its duty to record patron information with respect to Person
 A or others.
 - b. Incident reports were not timely submitted, and the Casino did not gather all information required for the reports. In one instance, the Casino did not fully investigate or gather information with respect to a complaint alleging money laundering.

CAUSE FOR DISCIPLINE

(Failure To Protect Public Health, Safety, and Welfare)

17. Respondents' licenses are subject to discipline, including revocation, because they failed to protect the public health, safety, and welfare. Their acts and omissions pose a threat to the public interest of this state and to the effective regulation and control of controlled gambling. Their acts and omissions create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in the conduct of controlled gambling or in the carrying on of the business and financial arrangements incidental thereto.

1	18. As alleged in paragraphs 10 through 16 above and incorporated herein by
2	reference, Respondents failed to employ and maintain suitable methods of operations.
3	Respondents persistently used or tolerated unsuitable, unlawful methods for the Casino's
4	operations.
5	(Bus. & Prof. Code, §§ 19801, 19823, 19824, subd. (d), 19857, subds. (a) & (b), 19866, 19920,
6	19922, 19924; Cal. Code Regs., tit. 4, §§ 12315, subd. (a), 12386, subd. (a)(2)(G), 12395, subd.
7	(a)(3) & (4); Cal. Code Regs., tit. 11, § 2052, subd. (c).)
8	<u>PRAYER</u>
9	WHEREFORE, Complainant requests that a hearing be held on the matter herein alleged,
10	and that following the hearing, the Commission issue a decision:
11	 Disciplining California State Gambling License Number GEOW-002429, issued to
12	respondent The Bicycle Casino, L.P.;
13	 Disciplining California State Gambling License Number GEOW-003389, issued to
14	respondent Leo Chu;
15	 Disciplining California State Gambling License Number GEOW-003574, issued to
16	respondent Thousand Palms Enterprises, Inc.;
17	4. Imposing fines or monetary penalties against Respondents, jointly and severally,
18	according to proof and to the maximum extent allowed by law;
19	5. Awarding Complainant the costs of investigation and the costs of bringing this
20	accusation before the Commission, pursuant to Business and Professions Code section 19930,
21	subdivisions (d) and (f), in a sum according to proof; and
22	6. Taking such other and further action as the Commission may deem appropriate.
23	Dated: November 4, 2021 With Civilia
24	Dated: November 4, 2021 NATHAN DAVALLE., Acting Director
25	Bureau of Gambling Control California Department of Justice
26	The state of the s
27	SA2005101609

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<u>APPENDIX A – STATUTORY AND REGULATORY PROVISIONS</u>

Business and Professions Code Provisions

- Business and Professions Code section 19801 provides, in part: 1.
 - (g) Public trust that permissible gambling will not endanger public health, safety, or welfare requires that comprehensive measures be enacted to ensure that gambling is free from criminal and corruptive elements, that is conducted honestly and competitively
 - (h) Public trust and confidence can only be maintained by strict comprehensive regulation of all persons, locations, practices, associations, and activities related to the operation of lawful gambling establishments and the manufacture and distribution of permissible gambling equipment.
 - (i) All gambling operations, all persons having a significant involvement in gambling operations, all establishments where gambling is conducted, and all manufacturers, sellers, and distributors of gambling equipment must be licensed and regulated to protect the public health, safety, and general welfare of the residents of this state as an exercise of the police powers of the state.

- (k) In order to effectuate state policy as declared herein, it is necessary that gambling establishments, activities, and equipment be licensed, that persons participating in those activities be licensed or registered, that certain transactions, events, and processes involving gambling establishments and owners of gambling establishments be subject to prior approval or permission, that unsuitable persons not be permitted to associate with gambling activities or gambling establishments Any license or permit issued, or other approval granted pursuant to this chapter, is declared to be a revocable privilege, and no holder acquires any vested right therein or thereunder.
- 2. Business and Professions Code section 19811 provides, in part:
 - (b) Jurisdiction, including jurisdiction over operation and concentration, and supervision over gambling establishments in this state and over all persons or things having to do with the operations of gambling establishments is vested in the commission.
- 3. Business and Professions Code section 19823 provides:
 - (a) The responsibilities of the commission include, without limitation, all of the following:

1		(1) Assuring that licenses, approvals, and permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose
2		operations are conducted in a manner that is inimical to the public health, safety, or welfare.
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4		(2) Assuring that there is no material involvement, directly or
5		indirectly, with a licensed gambling operation, or the ownership or management thereof, by unqualified or disqualified persons, or by
6 7		persons whose operations are conducted in a manner that is inimical to the public health, safety, or welfare.
8		
9		(b) For the purposes of this section, "unqualified person" means a
10		person who is found to be unqualified pursuant to the criteria set forth in Section 19857, and "disqualified person" means a person who is found to be
11		disqualified pursuant to the criteria set forth in Section 19859.
12	4.	Business and Professions Code section 19824 provides, in part:
13		The commission shall have all powers necessary and proper to enable it
14		fully and effectually to carry out the policies and purposes of this chapter, including, without limitation, the power to do all of the following:
15		* * *
16 17		(d) Take actions deemed to be reasonable to ensure that no ineligible, unqualified, disqualified, or unsuitable persons are associated with controlled gambling activities.
18	5.	Business and Professions Code section 19826 provides, in part:
19		The department[³] shall have all of the following responsibilities:
20		
21		* * *
22		(c) To investigate suspected violations of this chapter or laws of this state relating to gambling
23		
24		* * *
2526		(e) To initiate, where appropriate, disciplinary actions as provided in this chapter. In connection with any disciplinary action, the department may seek restriction, limitation, suspension, or revocation of any license or
27	3	"Department" refers to the Department of Justice. (Bus. & Prof. Code, § 19805, subd.
28	(h).) The	e Bureau is an entity within the Department of Justice. (Bus. & Prof. Code, § 19805, subd.

1		approval, or the imposition of any fine upon any person licensed or
2		approved.
3	6.	Business and Professions Code section 19856 provides, in part:
4		* * *
5		(b) Other persons who also obtain a state gambling license, as required by this chapter, shall not receive a separate license certificate, but the license
6		of every such person shall be endorsed on the license certificate that is issued
7		to the owner of the gambling enterprise.
8	7.	Business and Professions Code section 19857 provides:
9 10		No gambling license shall be issued unless, based on all the information and documents submitted, the commission is satisfied that the applicant is all of the following:
11		(a) A person of good character, honesty and integrity.
12		(b) A person whose prior activities, criminal record, if any,
13		reputation, habits, and associations do not pose a threat to the public interest of this state, or to the effective regulation and control of controlled
14		gambling, or create or enhance the dangers of unsuitable, unfair, or illegal
15		practices, methods, and activities in the conduct of controlled gambling or in the carrying on of the business and financial arrangements incidental
16		thereto.
17		(c) A person that is in all other respects qualified to be licensed as provided in this chapter.
18		
19	8.	Business and Professions Code section 19866 provides:
20		An applicant for licensing or for any approval or consent required
21		by this chapter, shall make full and true disclosure of all information to the department and the commission as necessary to carry out the policies
22		of this state relating to licensing, registration, and control of gambling.
23	9.	Business and Professions Code section 19920 provides:
24		It is the policy of the State of California to require that all
25		establishments wherein controlled gambling is conducted in this state be operated in a manner suitable to protect the public health, safety, and
26		general welfare of the residents of the state. The responsibility for the employment and maintenance of suitable methods of operation rests
27		with the owner licensee, and willful or persistent use or toleration of methods of operation deemed unsuitable by the commission or by local
28		medicus of operation decined unsultable by the commission of by local

1 2	government shall constitute grounds for license revocation or other disciplinary action.
3	10. Business and Professions Code section 19922 provides:
4	No owner licensee shall operate a gambling enterprise in violation
5	of any provision of this chapter or any regulation adopted pursuant to this chapter.
6	•
7	11. Business and Professions Code section 19924 provides:
8	Each owner licensee shall maintain security controls over the
9	gambling premises and all operations therein related to gambling, and those security controls are subject to the approval of the commission.
10	
11	12. Business and Professions Code section 19930 provides, in part:
12	(b) If, after any investigation, the department is satisfied that a license,
13	permit, finding of suitability, or approval should be suspended or revoked, it shall file an accusation with the commission in accordance with Chapter 5
14	(commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.
15	* * *
16	(d) In any case in which the administrative law judge recommends that
	the commission revoke, suspend, or deny a license, the administrative law
17	judge may, upon presentation of suitable proof, order the licensee or applicant
18	± • • • • • • • • • • • • • • • • • • •
	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation
18	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by
18 19	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision
18 19 20	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision and remands the case to the administrative law judge, the administrative
18 19 20 21	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision
18 19 20 21 22	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision and remands the case to the administrative law judge, the administrative law judge may not increase the amount of any costs assessed in the proposed decision. (2) The department may enforce the order for payment in the
18 19 20 21 22 23	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision and remands the case to the administrative law judge, the administrative law judge may not increase the amount of any costs assessed in the proposed decision. (2) The department may enforce the order for payment in the superior court in the county in which the administrative hearing was held. The right of enforcement shall be in addition to any other rights that the
18 19 20 21 22 23 24	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision and remands the case to the administrative law judge, the administrative law judge may not increase the amount of any costs assessed in the proposed decision. (2) The department may enforce the order for payment in the superior court in the county in which the administrative hearing was held.
18 19 20 21 22 23 24 25	judge may, upon presentation of suitable proof, order the licensee or applicant for a license to pay the department the reasonable costs of the investigation and prosecution of the case. (1) The costs assessed pursuant to this subdivision shall be fixed by the administrative law judge and may not be increased by the commission. When the commission does not adopt a proposed decision and remands the case to the administrative law judge, the administrative law judge may not increase the amount of any costs assessed in the proposed decision. (2) The department may enforce the order for payment in the superior court in the county in which the administrative hearing was held. The right of enforcement shall be in addition to any other rights that the

1 2		(3) In any judicial action for the recovery of costs, proof of the commission's decision shall be conclusive proof of the validity of the
3		order of payment and the terms for payment. * * *
5		(f) For purposes of this section, "costs" include costs incurred for any of the following:
6		(1) The investigation of the case by the department.
7		(2) The preparation and prosecution of the case by the Office of the Attorney General.
8	13.	Business and Professions Code section 19971 provides:
9		This act is an exercise of the police power of the state for the
10		protection of the health, safety, and welfare of the people of the State of California, and shall be liberally construed to effectuate those purposes.
11		, F
12		California Code of Regulations, Title 4
13	14.	California Code of Regulations, title 4, section 12315 provides:
14 15		(a) A gambling enterprise is required to file a report of each transaction involving currency in excess of \$10,000, in accordance with section 14162(b) of the Penal Code.
16		(b) A gambling enterprise, regardless of gross revenue, shall
17		make and keep on file at the gambling establishment a report of each transaction in currency, in accordance with sections 5313 and 5314 of
18 19		Title 31 of the United States Code and with Chapter X of Title 31 of the Code of Federal Regulations, and any successor provisions. These reports shall be available for inspection at any time as requested by the Bureau.
20		(c) Nothing in this section shall be deemed to waive or to suspend
21		the requirement that a gambling enterprise make and keep a record and file a report of any transaction otherwise required by the Bureau or the
22		Commission.
23	15.	California Code of Regulations, title 4, section 12386, subdivision (a)(2)(G)
24	provides:	
25		(a) The policies and procedures for all tiers must meet or exceed the
26		following standards for cages:
27		* * *
28		

1	(4) An incident report shall include, when available and applicable, the
2	following information:
3	(A) The date and time of the incident or event.
4	(B) The identity of each perpetrator or suspect, including the following:
5	
6	1. Full name.
7	2. Address.
8	3. Date of birth.
9	4. Driver license or identification card number.
10	
11	17. California Code of Regulations, title 4, section 12554 provides, in part:
12	(a) Upon the filing with the Commission of an accusation by the
13	Bureau recommending revocation, suspension, or other discipline of a holder of a license, registration, permit, finding of suitability, or approval, the
14	Commission shall proceed under Chapter 5 (commencing with section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.
15	* * *
16	(c) The Administrative Law Judge and Commission shall base their
17	decisions on written findings of fact, including findings concerning any relevant aggravating or mitigating factors. Findings of fact shall be based
18	upon a preponderance of the evidence standard. The "preponderance of the evidence standard" is such evidence as when considered and compared with
19	that opposed to it, has more convincing force, and produces a belief in the mind of the fact-finder that what is sought to be proved is more likely true
20	than not true.
21	(d) Upon a finding of a violation of the Act, any regulations adopted
22	pursuant thereto, any law related to gambling or gambling establishments, violation of a previously imposed disciplinary or license condition, or laws
23	whose violation is materially related to suitability for a license, registration, permit, or approval, the Commission may do any one or more of the
24	following:
25	(1) Revoke the license, registration, permit, finding of suitability, or approval;
26	(2) Suspend the license, registration, or permit;
27	* * *
28	

1	(4) Impose any condition, limitation, order, or directive ;
2	(5) Impose any fine or monetary penalty consistent with Business
3	and Professions Code sections 19930, subdivision (c), and 19943, subdivision (b)
4	
5	California Code of Regulations, Title 11
6	18. California Code of Regulations, title 11, section 2052, subdivision (c), provides:
7	Within five days of any owner licensee or key employee obtaining
8	knowledge or notice of any possible violation of the Act or these regulations, a written report shall be submitted to the Bureau, which details
9	the nature of the violation, the identities of those persons involved in the violation, and describes what actions have been taken to address the
10	violation.
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