



1 XAVIER BECERRA  
 Attorney General of California  
 2 SARA J. DRAKE  
 Senior Assistant Attorney General  
 3 JENNIFER T. HENDERSON  
 Deputy Attorney General, SBN 206231  
 4 1300 I Street, Suite 125  
 P.O. Box 944255  
 5 Sacramento, CA 94244-2550  
 Telephone: (916) 210-7784  
 6 Fax: (916) 327-2319  
 E-mail: Jennifer.Henderson@doj.ca.gov  
 7 *Attorneys for Complainant*

8 **BEFORE THE**  
 9 **CALIFORNIA GAMBLING CONTROL COMMISSION**  
 10 **STATE OF CALIFORNIA**

12 In the Matter of the Statement of Reasons for  
 13 Denial of Application for a Third-Party  
 Proposition Player Services License for:

**BGC Case No. BGC-HQ2018-00057SL**

**CGCC Case No: CGCC-2018-1101-10A**

14 **CINDY QUIROZ YANEZ**  
 15 [REDACTED]

**STATEMENT OF REASONS**

16  
 17 **Respondent.**

18  
 19 Complainant alleges as follows:

20 **PARTIES**

21 1. Stephanie K. Shimazu (Complainant) brings this Statement of Reasons solely in her  
 22 official capacity as Director of the California Department of Justice, Bureau of Gambling Control  
 23 (Bureau).

24 2. On October 21, 2014, the Bureau received an Application for Third-Party Proposition  
 25 Player Services License for Supervisor, Player or Other Employee, dated October 16, 2014, and a  
 26 Level I Supplemental Information, dated December 19, 2014 (collectively, Application), from  
 27 Cindy Quiroz Yanez (Respondent), to allow for her employment as a third-party proposition  
 28

1 player (prop-player) for Aces High Gaming, LLC (Aces), a registered third-party proposition  
2 player services provider, registration number TPPP-000092.<sup>1</sup>

3 3. Respondent has been employed as a prop-player by Aces since August 2014. On or  
4 about September 4, 2014, the California Gambling Control Commission (Commission) issued  
5 Respondent a registration, number TPPL-014270, as a prop-player for this employment.  
6 Respondent's registration currently expires on April 30, 2020.

7 4. Respondent has been employed as a prop-player since 2010 for various companies.  
8 Her employment history includes:

- 9 a. Employment at Modern Gaming Systems, LP, from February 2014 to May 2014,  
10 under registration number TPPL-013079, and
- 11 b. Employment at Gold Gaming Consultants, Inc., from November 2013 to February  
12 2014, under registration number TPPL-012853, and
- 13 c. Employment at Team View Player Services, LLC, from May 2010 to November  
14 2013, under registration number TPPL-008031.

15 5. On or about September 7, 2018, the Bureau submitted a Third-Party Player  
16 Background Investigation Report to the Commission, in which it recommended that Respondent's  
17 Application be denied.

18 6. At its November 9, 2018, meeting, the Commission referred consideration of  
19 Respondent's Application to an evidentiary hearing, which is to be held pursuant to California  
20 Code of Regulations, title 4, section 12060.<sup>2</sup>

21 7. On or about November 27, 2018, Respondent submitted a Notice of Defense, which is  
22 dated November 19, 2018.

23 **BURDEN OF PROOF**

24 8. Respondent has the burden of proving her qualifications to receive a license.

25 <sup>1</sup> Respondent is required to convert her registration to a license and submit an application  
26 for such licensure pursuant to California Code of Regulations, title 4, sections 12205.1 and  
27 12218, because Aces was summoned on March 7, 2012, to submit an application to convert its  
28 registration to a license.

<sup>2</sup> The statutes and regulations applicable to this Statement of Reasons are quoted in  
pertinent part in Appendix A.

1 (Bus. & Prof. Code, § 19856, subd. (a).)

2 **FIRST CAUSE FOR DENIAL**  
3 **((Disqualification – Conviction of Crime of Moral Turpitude))**

4 9. Respondent’s Application is subject to denial and her registration subject to  
5 revocation or cancellation in that on or about June 7, 2007, Respondent was convicted of  
6 violating Vehicle Code section 20002, subdivision (a), failure by a driver involved in an accident  
7 to immediately stop, a misdemeanor and crime involving moral turpitude, in the case of *People v.*  
8 *Cindy Quiroz Yanez* (Supt. Ct. Santa Cruz, 2007, Case No. M38706). Respondent admitted that  
9 she left the scene of an accident that resulted in property damage due to driving while inebriated.  
10 Respondent’s criminal conviction occurred less than ten years prior to the submission of her  
11 Application, and she has not been provided relief from that criminal conviction pursuant to Penal  
12 Code sections 1203.4, 1203.4a or 1203.45.

13 (Bus. & Prof. Code, §§ 19856, 19857, subds. (a) & (b), 19859, subds. (a) [mandatory denial] &  
14 (b) [mandatory denial] & 19866; Cal. Code. Regs., tit. 4, §§ 12200.18, subds. (a), (b) & (f), 12205  
15 & 12218.11, subds. (e) [mandatory denial], (f) [mandatory denial] & (j) [mandatory denial].)

16 **SECOND CAUSE FOR DENIAL**  
17 **(Providing Untrue or Misleading Information)**

18 10. Respondent’s Application is subject to denial and her registration subject to  
19 revocation or cancellation in that Respondent provided untrue or misleading information that was  
20 material to her qualifications for licensure. She provided to the Bureau a substantially and  
21 factually different explanation of the events that resulted in her 2007 conviction, alleged in  
22 paragraph 9 above and incorporated herein by reference, than that she provided to the California  
23 Highway Patrol (CHP) at the time of her arrest. Her explanations are as follows:

24 a. In response to the Bureau’s inquiry regarding the circumstances that resulted in her  
25 2007 conviction, Respondent provided a written statement dated April 19, 2017, in which she  
26 stated that “On March 25, 2007, I was out with friends and I was inebriated and opted to drive. I  
27 had a blackout and apparently hit a vehicle and drove away but do not remember doing so.”  
28



1 **APPENDIX A**

2 **JURISDICTION**

- 3 1. Business and Professions Code section 19811, subdivision (b), provides:

4 Jurisdiction, including jurisdiction over operation and  
5 concentration, and supervision over gambling establishments in this  
6 state and over all persons or things having to do with the operation of  
7 gambling establishments is vested in the commission.

- 8 2. Business and Professions Code, section 19823 provides:

9 (a) The responsibilities of the commission include, without  
10 limitation, all of the following:

11 (1) Assuring that licenses, approvals, and permits are not  
12 issued to, or held by, unqualified or disqualified persons, or by  
13 persons are conducted in a manner that is inimical to the public  
14 health, safety, or welfare.

15 (2) Assuring that there is no material involvement,  
16 directly or indirectly, with a licensed gambling operation, or  
17 the ownership or management thereof, by unqualified or  
18 disqualified persons, or by persons whose operations are  
19 conducted in a manner that is inimical to the public health,  
20 safety, or welfare.

21 (b) For the purposes of this section, “unqualified person” means a  
22 person who is found to be unqualified pursuant to the criteria set forth  
23 in Section 19857, and “disqualified person” means a person who is  
24 found to be disqualified pursuant to the criteria set forth in Section  
25 19859.

- 26 3. Business and Professions Code, section 19824 provides, in part:

27 The commission shall have all powers necessary and proper to  
28 enable it fully and effectually to carry out the policies and purposes of  
this chapter,<sup>3</sup> including, without limitation, the power to do all of the  
following:

\*\*\*

(b) For any cause deemed reasonable by the commission, deny  
any application for a license, permit, or approval provided for in this  
chapter or regulations adopted pursuant to this chapter, limit,  
condition, or restrict any license, permit, or approval, or impose any  
fine upon any person licensed or approved. The commission may  
condition, restrict, discipline, or take action against the license of an

---

<sup>3</sup> “Chapter” refers to Business and Professions Code, division 8, chapter 5 (commencing with section 19800), also known as the Gambling Control Act.

1 individual owner endorsed on the license certificate of the gambling  
2 enterprise whether or not the commission takes action against the  
license of the gambling enterprise.

3 \* \* \*

4 (d) Take actions deemed to be reasonable to ensure that no  
5 ineligible, unqualified, disqualified, or unsuitable persons are  
associated with controlled gambling activities.

6 4. Business and Professions Code, section 19853, subdivision (a), provides, in part:

7 The commission, by regulation or order, may require that the  
8 following persons register with the commission, apply for a finding of  
9 suitability as defined in subdivision (i) of [Business and Professions  
Code, section] 19805, or apply for a gambling license:

10 \* \* \*

11 (3) Any person who does business on the premises of a  
licensed gambling establishment.

12 5. Business and Professions Code, section 19870 provides:

13 (a) The commission, after considering the recommendation of the  
14 chief<sup>4</sup> and any other testimony and written comments as may be  
presented at the meeting, or as may have been submitted in writing to  
15 the commission prior to the meeting, may either deny the application  
or grant a license to an applicant who it determines to be qualified to  
16 hold the license.

17 (b) When the commission grants an application for a license or  
approval, the commission may limit or place restrictions thereon as it  
18 may deem necessary in the public interest, consistent with the policies  
described in this chapter.

19 (c) When an application is denied, the commission shall prepare  
and file a detailed statement of its reasons for the denial.

20 (d) All proceedings at a meeting of the commission relating to a  
21 license application shall be recorded stenographically or by audio or  
video recording.

22 (e) A decision of the commission denying a license or approval,  
23 or imposing any condition or restriction on the grant of a license or  
approval may be reviewed by petition pursuant to Section 1085 of the  
24 Code of Civil Procedure. Section 1094.5 of the Code of Civil  
Procedure shall not apply to any judicial proceeding described in the  
25 foregoing sentence, and the court may grant the petition only if the  
26 court finds that the action of the commission was arbitrary and  
capricious, or that the action exceeded the commission's jurisdiction.

27  
28 

---

<sup>4</sup> "Chief" refers to the Director of the Bureau. (Bus. & Prof. Code, § 19805, subd. (d).)

1           6. Business and Professions Code, section 19871 provides:

2                   (a) The commission meeting described in Section 19870 shall be  
3 conducted in accordance with regulations of the commission and as  
4 follows:

5                           (1) Oral evidence shall be taken only upon oath or  
6 affirmation.

7                           (2) Each party shall have all of the following rights:

8                                   (A) To call and examine witnesses.

9                                   (B) To introduce exhibits relevant to the issues  
10 of the case.

11                                  (C) To cross-examine opposing witnesses on  
12 any matters relevant to the issues, even though the  
13 matter was not covered on direct examination.

14                                  (D) To impeach any witness, regardless of  
15 which party first called the witness to testify.

16                                  (E) To offer rebuttal evidence.

17                           (3) If the applicant does not testify in her or his own behalf,  
18 he or he may be called and examined as if under cross-  
19 examination.

20                           (4) The meeting need not be conducted according to  
21 technical rules relating to evidence and witnesses. Any relevant  
22 evidence may be considered, and is sufficient in itself to support a  
23 finding, if it is the sort of evidence on which responsible persons  
24 are accustomed to rely in the conduct of serious affairs, regardless  
25 of the existence of any common law or statutory rule that might  
26 make improper the admission of that evidence over objection in a  
27 civil action.

28                   (b) Nothing in this section confers upon an applicant a right to  
discovery of the department's<sup>5</sup> investigative reports or to require  
disclosure of any document or information the disclosure of which is  
otherwise prohibited by any other provision of this chapter.

7. Business and Professions Code section 19984, subdivision (b), provides, in part:

The commission shall establish reasonable criteria for, and require  
the licensure and registration of, any person or entity that provides  
proposition player services to gambling establishments pursuant to this  
section, including owners, supervisors, and players . . . . The  
commission may impose licensing requirements, disclosures,

---

<sup>5</sup> "Department" refers to the Department of Justice. (Bus. & Prof. Code, § 19805, subd. (h).)

1 approvals, conditions, or limitations as it deems necessary to protect  
2 the integrity of controlled gambling in this state . . . .

3 8. California Code of Regulations, title 4, section 12056, subdivision (a) provides, in  
4 part:

5 If the Commission elects to hold an evidentiary hearing, the  
6 hearing will be conducted as a GCA hearing under Section 12060,  
7 unless the Executive Director or the Commission determines the  
8 hearing should be conducted as an APA hearing under Section  
9 12058 . . . .

10 9. California Code of Regulations, title 4, section 12060, provides:

11 (a) If the Executive Director determines it is appropriate, he or he  
12 may set an application for consideration at a GCA hearing in advance  
13 of a meeting pursuant to Section 12054. The Executive Director shall  
14 give notice to the applicant, pursuant to paragraph (2) subsection (c) of  
15 Section 12052, to the Office of the Attorney General, and to the  
16 Bureau no later than 90 calendar days in advance of the GCA hearing.  
17 The Executive Director's determination will be based on information  
18 contained in the Bureau's report or other appropriate sources  
19 including, without limitation, a request from the Bureau or applicant  
20 as well as the Commission's operational considerations. The  
21 Commission retains the authority to refer the matter to an APA  
22 hearing pursuant to subsection (a) of Section 12056 or hear the matter  
23 at a Section 12054 meeting if the Commission deems it appropriate.

24 (b) When the Commission has elected to hold a GCA hearing, the  
25 Executive Director shall give notice to the applicant, pursuant to  
26 paragraph (2) subsection (c) of Section 12052, to the Office of the  
27 Attorney General, and to the Bureau no later than 60 calendar days in  
28 advance of the GCA hearing.

(c) The presiding officer shall have no communication with the  
Commission or Commission staff upon the merits, or upon  
information or documents related to the application prior to the  
evidentiary hearing. The Executive Director shall designate a  
presiding officer which shall be:

(1) A member of the Commission's legal staff; or,

(2) An Administrative Law Judge.

(d) The applicant or the complainant, or the applicant and the  
complainant, may request a continuance in writing to the Executive  
Director stating the reason for the continuance and any proposed  
future hearing dates. The Executive Director or Commission may  
approve the request.

(e) The complainant shall provide to the applicant, at least 45  
calendar days prior to the GCA hearing, and the applicant shall



1 provide to the complainant, at least 30 calendar days prior to the GCA  
2 hearing, the following items.

3 (1) A list of potential witnesses with the general subject of  
4 the testimony of each witness;

5 (2) Copies of all documentary evidence intended to be  
6 introduced at the hearing and not previously provided;

7 (3) Reports or statements of parties and witnesses, if  
8 available; and

9 (4) All other written comments or writings containing  
10 relevant evidence.

11 (f) A presiding officer shall rule on the admissibility of evidence  
12 and on any objections raised except for objections raised under  
13 subsection (g). A ruling by the presiding officer shall be final.

14 (1) In advance of the GCA hearing, upon a motion of a party  
15 or by order of the presiding officer, the presiding officer may  
16 conduct a pre-hearing conference, either in person, via  
17 teleconference, or by email exchange, subject to the presiding  
18 officer's availability and shall issue a pre-hearing order if  
19 appropriate or requested by either party. The pre-hearing  
20 conference and order may address the following:

21 (A) Evidentiary issues;

22 (B) Witness and exhibit lists;

23 (C) Alterations in the Bureau recommendation;

24 (D) Stipulation for undisputed facts including the  
25 admission of the Bureau's report; and

26 (E) Other issues that may be deemed appropriate to  
27 promote the orderly and prompt conduct of the hearing.

28 (2) The GCA hearing need not be conducted according to  
technical rules of evidence. Any relevant evidence may be  
considered, and is sufficient in itself to support findings if it is the  
sort of evidence on which reasonable persons are accustomed to  
rely in the conduct of serious affairs, regardless of the existence of  
any common law or statutory rule that might make improper the  
admission of that evidence over objection in a civil action.

(g) The Commission may, at any time upon a showing of  
prejudice by the objecting party:

(1) Prohibit the testimony of any witness or the introduction  
of any documentary evidence that has not been disclosed pursuant  
to subsection (e); or

1 (2) Continue any meeting or hearing as necessary to mitigate  
2 any prejudice.

3 (h) The complainant shall present all facts and information in the  
4 Bureau report, if any, and the results of the Bureau's background  
5 investigation, and the basis for any recommendation, if the Bureau  
6 filed one with the Commission according to Business and Professions  
7 Code section 19868, to enable the Commission to make an informed  
8 decision on whether the applicant has met her, his, or its burden of  
9 proof. The complainant may but is not required to recommend or seek  
10 any particular outcome during the evidentiary hearing, unless it so  
11 chooses.

12 (i) The burden of proof is on the applicant at all times to prove  
13 her, his, or its qualifications to receive any license or other approval  
14 under the Act.

15 (j) The applicant may choose to represent himself, herself, or  
16 itself, or may retain an attorney or lay representative.

17 (k) Except as otherwise provided in subsection (g), the  
18 complainant and applicant shall have the right to call and examine  
19 witnesses under oath; to introduce relevant exhibits and documentary  
20 evidence; to cross-examine opposing witnesses on any relevant matter,  
21 even if the matter was not covered in direct examination; to impeach  
22 any witness, regardless of which party first called the witness to  
23 testify; and to offer rebuttal evidence. If the applicant does not testify  
24 on her, his or its own behalf, the applicant may be called and  
25 examined, under oath, as if under cross-examination.

26 (l) Oral evidence shall be taken upon oath or affirmation, which  
27 may be administered by the Executive Director, a member of the  
28 Commission, or the presiding officer, if an Administrative Law Judge.

(m) At the conclusion of the evidentiary hearing, the members of  
the Commission shall take the matter under submission, may discuss  
the matter in a closed session meeting, and may schedule future closed  
session meetings for deliberation.

10. California Code of Regulations, title 4, section 12200.3, subdivision (g), provides:

Registrations, licenses, and badges are specific to the primary  
owner. Third party proposition player services cannot be provided  
without first applying for and obtaining a registration, license, or  
badge.

11. California Code of Regulations, title 4, section 12205 provides:

(a) Any regular registration issued in accordance with this  
chapter<sup>6</sup> shall be subject to cancellation pursuant to this section. A

---

<sup>6</sup> "Chapter" refers to California Code of Regulations, title 4, division 18, chapter 2.1, section 12200 et seq.

1 registration shall be cancelled if the Commission determines after a  
2 noticed hearing that the registrant is ineligible for registration, has  
3 failed in the application for registration to reveal any fact material to  
4 the holder's qualification for registration, or has supplied information  
5 in the registration application that is untrue or misleading as to a  
6 material fact pertaining to the criteria for issuance of registration.

7 (b) If the Commission finds that any of the circumstances set  
8 forth in subsection (a) apply, then the Executive Director shall  
9 immediately do all of the following:

10 (1) Provide written notice to the registrant and the Bureau of  
11 the cancellation of the registration and the grounds thereof, and  
12 provide written notice of the cancellation to the owner, if the  
13 registrant is a supervisor, player, or other employee and to any  
14 gambling establishment in which the registrant provides  
15 proposition player services.

16 (2) Notify the registrant, if an individual, that he or he is  
17 required to surrender the registrant's badge to the Commission not  
18 more than ten days following the date that the notice of the  
19 cancellation was mailed or such greater time as is authorized by  
20 the Executive Director.

21 12. California Code of Regulations, title 4, section 12205.1, provides:

22 (a) As expeditiously as possible in light of available program  
23 resources, the Bureau shall summon persons registered as primary  
24 owners, owners, supervisors, players, and other employees for the  
25 purpose of applying for licenses under this chapter. The registration of  
26 any registrant that fails or refuses to submit the applicable Application  
27 for Third Party Proposition Player Services License for Business Entities  
28 and Owners (BGC-433 (Rev. 10/17)) or Application for Third-Party  
Proposition Player Services License for Supervisors, Players or Other  
Employees (BGC-434 (Rev. 10/17)), which are hereby incorporated by  
reference, including any fees to the Bureau within 30 days of receiving a  
summons shall expire by operation of law on the following day. Prior to  
and during review of a request to convert a registration to a license, a  
registration shall remain valid and may be renewed by the registrant as  
necessary, upon application and approval of renewal of registration as  
provided in Section 12203A.

(b) Any person who became affiliated with a primary owner  
following receipt of a summons from the Bureau shall apply for  
registration pursuant to this chapter and shall be called forward by the  
Bureau expeditiously.

(c) If the registration expires by operation of law, the former  
registrant shall submit a new Application for Third Party Proposition  
Player Services License for Business Entities and Owners (BGC-433) or  
Application for Third-Party Proposition Player Services License for  
Supervisors, Players or Other Employees (BGC-434), which are  
referenced in subsection (a), and a new nonrefundable application fee as  
specified in paragraph (1), and the applicable additional fee specified in  
paragraph (3), (4), or (5) of subsection (d) of Section 12008.

1 13. California Code of Regulations, title 4, section 12218 provides:

2 (a) A request to convert a registration to a license shall be submitted  
3 to the Bureau only in response to a written summons to a primary owner  
4 pursuant to Section 12205.1. Each primary owner's request shall be  
accompanied by the requests of all affiliated owners, supervisors, players,  
and other employees.

5 (b) The request to convert a registration to a license shall designate  
6 whether the license is requested as a primary owner, owner, supervisor,  
7 player, or other employee. The request shall be signed by the individual  
requester or, if the requester is a business entity, by the chief executive  
officer or other designated officer of the business entity.

8 (c) The request to convert a registration to a license shall include all  
9 of the following:

10 (1) A completed Application for Third Party Proposition  
11 Player Services License for Business Entities and Owners (BGC-  
433) or Application for Third-Party Proposition Player Services  
12 License for Supervisors, Players or Other Employees (BGC-434),  
referenced in Section 12205.1.

13 (2) If applicable, the Trust Supplemental Background  
14 Investigation Information, BGC-APP-143 (Rev. 05/08), referenced  
in Section 12342 of this division.

15 (3) The applicable nonrefundable application fee in the  
amount specified in subsection (d) of Section 12008.

16 (4) Two 2x2 inch color passport-style photographs of a  
17 requester that is an individual taken no more than one year before  
submission of the request to the Bureau.

18 (5) The supplemental information package as defined in  
19 Section 12200(b).

20 (6) A sum of money that, in the judgment of the Chief of the  
Bureau, will be adequate to pay the anticipated investigation and  
21 processing costs, in accordance with Business and Professions  
Code sections 19867 and 19984(c).

22 (7) A copy of the summons issued by the Bureau.

23 (d) Nothing in this chapter shall require the Commission or Bureau  
24 to divulge to the requester any confidential information received from  
any law enforcement agency or any information received from any  
25 person with assurances that the information would be maintained as  
confidential. Nothing in this chapter shall require the Commission or  
26 Bureau to divulge any information that might reveal the identity of any  
source of information or jeopardize the safety of any person.

27  
28

1 **SPECIFIC STATUTORY PROVISIONS**

2 14. Business and Professions Code section 19856 provides:

3 (a) Any person who the commission determines is qualified to  
4 receive a state license, having due consideration for the proper  
5 protection of the health, safety, and general welfare of the residents of  
6 the State of California and the declared policy of this state, may be  
7 issued a license. The burden of proving her or his qualifications to  
8 receive any license is on the applicant.

9 (b) An application to receive a license constitutes a request for a  
10 determination of the applicant's general character, integrity, and ability to  
11 participate in, engage in, or be associated with, controlled gambling.

12 (c) In reviewing an application for any license, the commission shall  
13 consider whether issuance of the license is inimical to public health,  
14 safety, or welfare, and whether issuance of the license will undermine  
15 public trust that the gambling operations with respect to which the license  
16 would be issued are free from criminal and dishonest elements and would  
17 be conducted honestly.

18 15. Business and Professions Code, section 19857 provides:

19 No gambling license shall be issued unless, based on all of the  
20 information and documents submitted, the commission is satisfied that  
21 the applicant is all of the following:

22 (a) A person of good character, honesty, and integrity.

23 (b) A person whose prior activities, criminal record, if any,  
24 reputation, habits, and associations do not pose a threat to the public  
25 interest of this state, or to the effective regulation and control of  
26 controlled gambling, or create or enhance the dangers of unsuitable,  
27 unfair, or illegal practices, methods, and activities in the conduct of  
28 controlled gambling, or in the carrying on of the business and financial  
arrangements incidental thereto.

(c) A person that is in all other respects qualified to be licensed as  
provided in this chapter.

22 16. Business and Professions Code section 19859 provides, in part:

23 The commission shall deny a license to any applicant who is  
24 disqualified for any of the following reasons:

25 (a) Failure of the applicant to clearly establish eligibility and  
26 qualification in accordance with this chapter.

27 (b) Failure of the applicant to provide information,  
28 documentation, and assurances required by this chapter or requested  
by the chief, or failure of the applicant to reveal any fact material to  
qualification, or the supplying of information that is untrue or  
misleading as to a material fact pertaining to the qualification criteria.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

17. Business and Professions Code section 19866 provides:

An applicant for licensing or for any approval or consent required 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 of this state relating to licensing, registration, and control of gambling.

18. California Code of Regulations, title 4, section 12200.18, provides, in part:

The Commission may revoke a registration or license, upon any of the following grounds, after a hearing conducted pursuant to the same procedures applicable to the revocation of a gambling establishment license:

(a) The registrant or licensee committed, attempted to commit, or conspired to commit any acts prohibited by the Act<sup>[7]</sup> or this chapter.

(b) Any act or omission by the registrant that would disqualify the registrant from obtaining registration under this chapter. Any act or omission by the licensee that would disqualify the licensee from obtaining licensing under this chapter.

\* \* \*

(f) The registrant or licensee concealed or refused to disclose any material fact in any inquiry by the Bureau or the Commission.

19. California Code of Regulations, title 4, section 12218.11, provides, in part:

A requester shall be ineligible for licensing for any of the following causes:

\* \* \*

(e) The requester has failed to meet the requirements of Business and Professions Code sections 19856 or 19857.

(f) The requester would be ineligible for a state gambling license under any of the criteria set forth in Business and Professions Code section 19859, subdivisions (b), (e), or (f).

\* \* \*

(j) The applicant is ineligible based on any other provision of law.

---

<sup>7</sup> “Act” refers to the “Gambling Control Act.” (Bus. & Prof. Code, § 19800 et seq.)