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Attorneys for Complainant

11 **BEFORE THE**
12 **CALIFORNIA GAMBLING CONTROL COMMISSION**
13 **STATE OF CALIFORNIA**

16 **In the Matter of the First Amended
Accusation Against:**

17 **Sacramento Casino Royale, LLC,**
license no. GEOW-003186,
18 dba: **Casino Royale,**
license no. GEGE-001295,
19 500 Leisure Lane
20 Sacramento, California 95815

21 and

22 **James Kouretas, Managing Member,**
license no. GEOW-003185

23 [REDACTED]

24 and

25 **William Blanas, Member,**
license no. GEOW-003187

26 [REDACTED]

28 and

BGC No.: BGC-HQ2014-00001AC

OAH No. 2014110146

**STIPULATED SETTLEMENT;
DECISION AND ORDER
(James Kouretas)**

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Faye E. Stearns Living Trust, Member,
License no. GEOW-003391
Faye E. Stearns, Trustor, Trustee, Beneficiary,
license no. GEOW-003392
[REDACTED]
Stanley Parrish, Trustee,
license no. GEOW-003393
[REDACTED]

Respondents.

STIPULATED SETTLEMENT

PURPOSE OF THIS STIPULATED SETTLEMENT

This Stipulated Settlement resolves the First Amended Accusation in the above-titled matter, as it pertains to respondent James Kouretas (Settling Respondent), is made on his behalf by his attorney-in-fact Joyce Kouretas (Ms. Kouretas). Settling Respondent is a member and owner of Sacramento Casino Royale, LLC (LLC). The LLC is a limited liability company that does business as Casino Royale, a licensed gambling establishment. This Stipulated Settlement does not resolve any of the allegations in the First Amended Accusation as they pertain to any other respondent. The First Amended Accusation seeks to discipline Settling Respondent's license for violations of, and lack of suitability for continued licensing under, the Gambling Control Act (Act) (Bus. & Prof. Code, § 19800 et seq.) and the regulations promulgated thereunder.

PARTIES

1. Wayne J. Quint, Jr. (Complainant) brought the original Accusation and the First Amended Accusation solely in his official capacity as the Chief of the California Department of Justice, Bureau of Gambling Control (Bureau).
2. On or about April 28, 2010, the California Gambling Control Commission (Commission) issued a state gambling license to the LLC. Settling Respondent is endorsed on

1 that license and was issued license number GEOW-003185. His license will expire on April 30,
2 2016.

3 JURISDICTION

4 3. On November 3, 2014, Settling Respondent was served with the original
5 Accusation,¹ as well as a Statement to Respondent (Gov. Code, § 11505, subd. (b)), Request for
6 Discovery (Gov. Code, § 11597.6), copies of Government Code sections 11507.5, 11507.6 and
7 11507.7, and two copies of the Notice of Defense form (Gov. Code, §§ 11505 & 11506).

8 4. Settling Respondent filed a timely Notice of Defense.

9 5. On November 26, 2014, Settling Respondent was served with the First Amended
10 Accusation.

11 ADVISEMENT AND WAIVERS

12 6. Settling Respondent has carefully reviewed, and has discussed with counsel, the
13 legal and factual allegations in the First Amended Accusation. Settling Respondent has also
14 carefully reviewed, and has discussed with counsel, this Stipulated Settlement. Settling
15 Respondent fully understands the terms and conditions contained within this Stipulated
16 Settlement and the effects thereof.

17 7. Settling Respondent is fully aware of his legal rights in this matter, including: the
18 right to a hearing on all the allegations in the First Amended Accusation; the right to be
19 represented by counsel of his choice at his own expense; the right to confront and cross-
20 examine the witnesses against him; the right to present evidence and testify on his own behalf;
21 the right to the issuance of subpoenas to compel the attendance of witnesses and the production
22 of documents; the right to apply for reconsideration and court review of an adverse decision;
23 and all other rights afforded by the California Administrative Procedure Act (Gov. Code, §
24 11370 et seq.), the Act, and all other applicable laws.

25
26 ¹ On November 3, 2014, Complainant issued an emergency order that, among other
27 things, ordered the LLC to suspend and cease any and all gambling related activities at, and
28 close, the gambling establishment. On December 22, 2014, Complainant issued a modified
emergency order, which remains in effect.

1 14. This Stipulated Settlement shall be subject to adoption by the Commission.
2 Settling Respondent understands and specifically agrees that counsel for the Complainant, and
3 the Bureau's staff, may communicate directly with the Commission regarding this Stipulated
4 Settlement, without notice to, or participation by, Settling Respondent or his counsel, and that
5 no such communication shall be deemed a prohibited ex parte communication. Settling
6 Respondent specifically acknowledges and agrees that such communications are permissible
7 pursuant Government Code section 11430.30, subdivision (b).

8 15. By signing this Stipulated Settlement, Settling Respondent understands and agrees
9 that he may not withdraw his agreement or seek to rescind the Stipulated Settlement prior to the
10 time the Commission considers and acts upon it. If the Commission fails to adopt this
11 Stipulated Settlement as its Decision and Order, this Stipulated Settlement shall be of no force
12 or effect, and, except for actions taken pursuant to this paragraph and paragraph 14 above, it
13 shall be inadmissible in any legal action between the parties. The Commission's consideration
14 of this Stipulated Settlement shall not disqualify it from any further action regarding Settling
15 Respondent's licensure, including, but not limited to, disposition of the First Amended
16 Accusation by a decision and order following a hearing on the merits.

17 16. The parties agree that a photocopy, facsimile or electronic copy of this Stipulated
18 Settlement, including copies with signatures thereon, shall have the same force and effect as an
19 original.

20 17. In consideration of the above admissions and stipulations, the parties agree that the
21 Commission may, without further notice or formal proceeding, issue and enter the Decision and
22 Order adopting this Stipulated Settlement.

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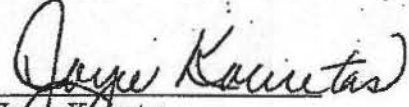
ACCEPTANCE

Ms. Kouretas, attorney-in-fact acting on behalf of Settling Respondent, has carefully read and considered the above Stipulated Settlement. Ms. Kouretas, attorney-in-fact acting on behalf of Settling Respondent, has discussed its terms and effects with legal counsel. Ms. Kouretas, attorney-in-fact acting on behalf of Settling Respondent, also understands the Stipulated Settlement and the effects it will have on Settling Respondent's state gambling license. Ms. Kouretas, attorney-in-fact acting on behalf of Settling Respondent, further understands that Settling Respondent's state gambling license will be revoked. Ms. Kouretas, attorney-in-fact acting on behalf of Settling Respondent, enters into this Stipulated Settlement voluntarily, knowingly and intelligently, and agrees to be bound by its terms.

Dated: February 17, 2016

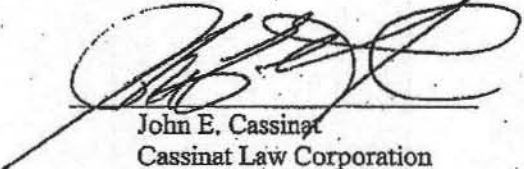
James Kouretas

By


Joyde Kouretas
Attorney-in-fact

Approved as to Form

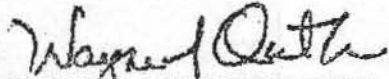
Dated: February 17, 2016


John E. Cassinat
Cassinat Law Corporation
Attorney for Settling Respondent

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COMPLAINANT'S ACCEPTANCE

Dated: February 19, 2016

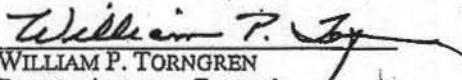


WAYNE J. QUINT, JR., Chief
Bureau of Gambling Control
California Department of Justice

The foregoing Stipulated Settlement is hereby respectfully submitted for consideration by the California Gambling Control Commission.

Dated: February 19, 2016

KAMALA D. HARRIS
Attorney General of California
SARA J. DRAKE
Senior Assistant Attorney General
RONALD L. DIEDRICH
Deputy Attorney General



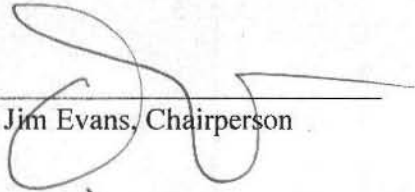
WILLIAM P. TORNGREN
Deputy Attorney General
Attorneys for the Complainant

1 **DECISION AND ORDER OF THE COMMISSION**

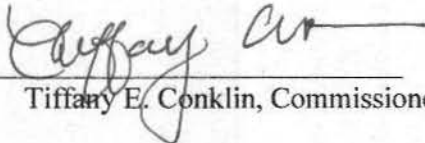
2 The California Gambling Control Commission hereby adopts the foregoing Stipulated
3 Settlement of the parties as it pertains to respondent James Kouretas for the case of *In the Matter*
4 *of the First Amended Accusation Against: Sacramento Casino Royale, LLC, et al.*, BGC Case
5 No. HQ2014-00001AC, as its final Decision and Order in this matter to be effective upon
6 execution below by its members.

7 **IT IS SO ORDERED**

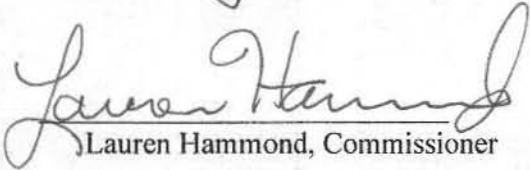
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9 Dated: 4/14/16


Jim Evans, Chairperson

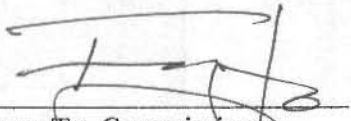
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11 Dated: 4/14/2016


Tiffany E. Conklin, Commissioner

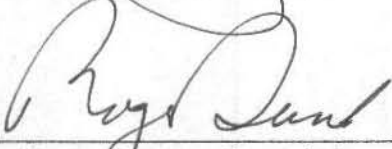
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13 Dated: 4/14/2016


Lauren Hammond, Commissioner

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15 Dated: 4/14/16


Trang To, Commissioner

16
17 Dated: 4/14/16


Roger Dunstan, Commissioner