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**BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION**

In the Matter of the Accusation Against:

HANH THI HUYNH

Respondent.

BGC Case No. BGC-HQ2023-00001AC
OAH Case No. [unassigned]
DEFAULT DECISION AND ORDER
(Gov. Code, § 11520)

FINDINGS OF FACT

1. On or about February 15, 2024, Yolanda Morrow (Complainant), solely in her official capacity as the Chief of the California Department of Justice, Bureau of Gambling Control (Bureau), caused an accusation to be served and filed in Case No. BGC-HQ2023-00001AC (Accusation)¹ against Hanh Thi Huynh (Respondent) before the California Gambling Control Commission (Commission). The Accusation set forth the bases for disciplining and revoking Respondent’s Third Party Worker Regular License Number TPWK-000127 (Respondent’s License).

2. On April 23, 2024, the Accusation was sent by certified mail to Respondent’s address on file with the Bureau and Respondent’s Designated Agent, Jordan Aman. The Bureau filed a copy of the April 23, 2024, Certificate of Service with the Commission.²

3. To date, Respondent has failed to file a Notice of Defense to the Accusation or make any type of oral or written request for a hearing to appeal or challenge the proposed discipline of Respondent’s License.

4. On August 8, 2024, on behalf of the Bureau, Deputy Attorney General Stephen D.

¹ Also served and filed with the Accusation were a Statement to Respondent (Gov. Code, § 11505, subd. (b)), a Request for Discovery (Gov. Code, § 11507.6), copies of Government Code sections 11507.5, 11507.6 and 11507.7, and two copies of the Notice of Defense form (Gov. Code, §§ 11505 & 11506) for Respondent’s use. Hereinafter, “Accusation” includes and refers to the Accusation pleading and the documents served and filed with it. A copy of the Accusation is attached as Attachment A and incorporated herein by reference.

² A copy of the Certificate of Service is attached as Attachment B and incorporated herein by reference.

1 Svetich (DAG Svetich) submitted to the Commission a letter and a Declaration with Exhibits A
2 through C attached for the Commission’s consideration of a Default Decision and Order revoking
3 Respondent’s License.

4 5. On August 16, 2024, DAG Svetich sent a new Declaration in Support of Default
5 Decision and Order with Exhibits A through F attached for the Commission’s consideration of a
6 Default Decision and Order revoking Respondent’s License.

7 **JURISDICTION**

8 6. Government Code section 11503 provides in pertinent part:

9
10 A hearing to determine whether a right, authority, license, or privilege
should be revoked...shall be initiated by filing an accusation.

11 7. Government Code section 11506, subdivision (c), provides in pertinent part:

12
13 The respondent shall be entitled to a hearing on the merits *if the*
14 *respondent files a notice of defense* or notice of participation, and the
15 notice shall be deemed a specific denial of all parts of the accusation. . .
16 not expressly admitted. *Failure to file a notice of defense or notice of*
participation shall constitute a waiver of respondent’s right to a hearing,
but the agency in its discretion may nevertheless grant a hearing.

17 (Italics added).

18 8. Government Code section 11520, subdivision (a) provides:

19
20 If the respondent either fails to file a notice of defense or to appear at the
21 hearing, the agency may take action based upon respondent’s express
22 admissions or upon other evidence and affidavits may be used as evidence
without any notice to respondent; and where the burden of proof is on the
respondent to establish that respondent is entitled to the agency action
sought, the agency may take action without taking evidence.

23 **DETERMINATION OF ISSUES**

24 9. Based on the foregoing findings of fact, Respondent’s License is subject to
25 revocation.

26 10. Service of the Accusation was proper and in accordance with the law.

27 11. As a result of Respondent’s failure to file a Notice of Defense to the Accusation,
28

1 or make any type of oral or written request for a hearing, the Commission has jurisdiction to
2 adjudicate this case by default and to order the revocation of Respondent's License.

3 12. The Commission is authorized to revoke Respondent's License based upon the
4 legal and factual allegations set forth in the Accusation and supported by evidence submitted by
5 the Bureau.

6 13. Respondent's License is subject to revocation based on evidence establishing that
7 Respondent engaged in violations of Title 4, California Code of Regulations (CCR) section
8 12560(c)(2) in that Respondent engaged in dishonest, fraudulent, or deceptive activities in
9 connection with controlled gambling or the provision of player services by stealing approximately
10 \$5,000 in gambling chips while working as a third party worker for Knighted Ventures, LLC
11 (Knighted), a third party provider of proposition player services, at Bay 101 Casino (Bay 101).

12 14. Respondent's License is subject to revocation based on evidence establishing that
13 Respondent engaged in violations of CCR section 12560(c)(3) in that Respondent committed an
14 act punishable as a crime which substantially relates to the duties and qualifications of the
15 licensee or which occurred in a gambling establishment by stealing approximately \$5,000 in
16 gambling chips while working as a third party worker for Knighted at Bay 101.

17 15. Respondent's License is subject to revocation based on evidence establishing that
18 Respondent engaged in violations of CCR section 12560(c)(4) in that Respondent engaged in
19 conduct on the premises of a gambling establishment or in connection with controlled gambling
20 or the provision of proposition player services which is inimical to the health, welfare, or safety
21 of the general public by stealing approximately \$5,000 in gambling chips while working as a third
22 party worker for Knighted at Bay 101.

23 16. Respondent's License is subject to revocation based on evidence establishing that
24 Respondent engaged in violations of CCR section 12560(d)(10) in that Respondent engaged in
25 dishonest, fraudulent, or unfairly deceptive activities in connection with controlled gambling by
26 stealing approximately \$5,000 in gambling chips while working as a third party worker for
27 Knighted at Bay 101.
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3. Each side to pay its own attorneys' fees.

This Order is effective on November 21, 2024.

Dated: 10/22/2024 Signature: 
Paula LaBrie, Chair

Dated: 10/22/2024 Signature: 
Stacey Luna Baxter, Commissioner

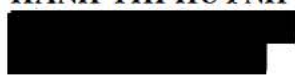
Dated: 10/22/2024 Signature: 
Eric Heins, Commissioner

Dated: 10/22/2024 Signature: 
William Liu, Commissioner

ATTACHMENT A

1 ROB BONTA
 Attorney General of California
 2 NANCY A. KAISER
 Supervising Deputy Attorney General
 3 STEPHEN D. SVETICH
 Deputy Attorney General
 4 State Bar No. 272370
 300 So. Spring Street, Suite 1702
 5 Los Angeles, CA 90013
 Telephone: (213) 269-6734
 6 Facsimile: (916) 731-2126
 E-mail: Stephen.Svetich@doj.ca.gov
 7 *Attorneys for Complainant*

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

<p>12 In the Matter of the Accusation Against:</p> <p>13 HANH THI HUYNH </p> <p>15 Third Party Player License No. TPPL- 024855, Third Party Worker Regular License No. TPWK-000127,</p> <p>17 Respondent.</p>	<p>BGC Case No. BGC-HQ2023-00001AC</p> <p>ACCUSATION</p>
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18
 19 **PARTIES**

20 1. Yolanda Morrow (“Complainant”) brings this Accusation solely in her official
 21 capacity as the Director of the California Department of Justice, Bureau of Gambling Control
 22 (“Bureau”).

23 2. On or about April 8, 2019, the California Gambling Control Commission
 24 (“Commission”) issued Third Party Registrant—Player License Number TPPL-024855 to Hanh
 25 Thi Huynh (“Respondent”). The Third Party Registrant—Player License was cancelled on
 26 August 4, 2020 upon the issuance of a Third Party Player License to Respondent under the same
 27 license number, and the Third Party Registrant—Player License is now null and void.
 28

1 3. On or about August 4, 2020, the Commission issued Third Party Player License
2 Number TPPL-024855 to Respondent. The Third Party Player License expired on August 31,
3 2021, and has not been renewed. It is currently inactive.

4 4. On or about February 25, 2021, the Commission issued Third Party Worker
5 Temporary License Number TPWK-000127 to Respondent. The Third Party Worker Temporary
6 License was cancelled on August 11, 2022 upon the issuance of a Third Party Worker Regular
7 License to Respondent under the same license number, and the Third Party Worker Temporary
8 License is now null and void.

9 5. On or about August 11, 2022, the Commission issued Third Party Worker Regular
10 License Number TPWK-000127 to Respondent. The Third Party Worker Regular License has
11 been active at all times relevant to the allegations herein and is scheduled to expire on August 31,
12 2024, unless renewed.

13 **RESPONDENT'S DESIGNATED AGENT**

14 6. On or about January 26, 2021, Respondent designated Jordan Aman, as her
15 Designated Agent on file with the Bureau. His address is 645 W. 9th Street, Unit 110-425, Los
16 Angeles, CA 90015.

17 **JURISDICTION, STANDARD OF PROOF, AND COST RECOVERY**

18 7. This Accusation is brought before the Commission under the authority of the
19 following laws. All section references are to the Business and Professions Code ("Code") unless
20 otherwise indicated.

21 8. The Commission has jurisdiction over the operation and concentration of gambling
22 establishments and all persons and things having to do with operation of gambling
23 establishments. (Code, § 19811, subd. (b); § 19984.)¹ The Commission has all powers necessary
24 and proper to fully and effectually carry out the policies and procedures of the Gambling Control
25 Act (Code, § 19800, et seq.). (Code, § 19824.) The Commission's responsibilities include
26 assuring that no unqualified person, or any person "whose operations are conducted in a manner

27 _____
28 ¹ The statues and regulations applicable to this Accusation are quoted in pertinent part in
Appendix A.

1 that is inimical to the public health, safety, and welfare” has any direct or indirect material
2 involvement with a licensed gambling operation. (Code, § 19823, subd. (a)(2).)

3 9. The Act is an exercise of the police power of the state intended to protect the public’s
4 health, safety and general welfare. The Act is to be liberally interpreted to effectuate that purpose.
5 (Code, § 19971.)

6 10. The Legislature has declared that a license is a “revocable privilege, and no holder
7 acquires any vested right therein or thereunder.” (Code, § 19801, subd. (k).) The Act tasks the
8 Bureau with, among other responsibilities, monitoring the conduct of licensees, investigating
9 suspected violations of the Act, and initiating disciplinary actions. (Code, §§ 19826, subds. (b),
10 (c), (e), 19930, subd. (b).)

11 11. Upon the Bureau filing an accusation, the Commission proceeds under Government
12 Code section 11500 et seq. (Code, § 19930, subd. (b); see Cal. Code Regs., tit. 4, § 12554(a).)
13 The Commission’s disciplinary powers include, among other things, license revocation, license
14 suspension, imposing a condition on a license, and requiring payment of a fine or monetary
15 penalty. (Code, § 19930, subd. (c); Cal. Code Regs., tit. 4, § 12554(d).)

16 12. In an accusation brought under the Act, the standard of proof is the preponderance of
17 the evidence. (Cal. Code Regs., tit. 4, § 12554 (c).)

18 13. In a matter involving discipline of a license, the Bureau may recover its costs of
19 investigation and prosecuting the proceeding. (Code, § 19930, subd. (d).)

20 **FACTS**

21 14. On October 20, 2022, Respondent was working as a third-party player for Knighted
22 Ventures, LLC, at Bay 101 Casino (“Bay 101”) in San Jose, California. During the incident
23 described below, Respondent was working at her assigned table when a Bay 101 employee
24 observed Respondent acting suspiciously. The employee thought Respondent might be stealing
25 because of the way she was concealing chips while she moved them, and he reported the incident
26 to Bay 101’s general manager.

27 15. Knighted Ventures’ general manager confronted Respondent regarding the
28 allegations. Respondent admitted to him that she took chips and concealed them inside of her

1 clothing. She also disclosed to him that she took the chips to another casino to gamble and
2 exchange them with people for money. Respondent stated she would hide one of her hands with
3 her other hand while grabbing a handful of \$100 chips, and then she would place the chips in her
4 shirt near her shoulder area, where they would slide down into her bra. Respondent admitted to
5 the general manager that she had been doing this for approximately two to three weeks, and that
6 she had stolen a total of \$5,000 to \$6,000 worth of chips.

7 16. Knighted Ventures' general manager reported the incident to police. On October 20,
8 2022, at approximately 2306 hours, San Jose Police Department officers responded to Bay 101.
9 The general manager told officers that Respondent stole approximately \$1,200 of chips that night.
10 After taking witness statements and collecting surveillance footage showing Respondent's theft,
11 the officers arrested Respondent for grand theft (Penal Code section 487, subd. (a)). Respondent
12 waived her Miranda rights and provided a statement to the responding officers. Respondent
13 admitted to the officers that on October 20, 2022, between approximately 3:00 p.m. and 5:00
14 p.m., she stole approximately \$1,100 in chips from Knighted Ventures. Respondent also admitted
15 to officers that she had stolen chips from Knighted Ventures several times before, but she could
16 not recall how many times. Respondent stated she started stealing chips approximately one
17 month prior to the incident because she was stressed out with a family situation and owed a lot of
18 money to people. Respondent admitted that over the course of the month, she stole
19 approximately \$5,000 to \$6,000 in chips from Knighted Ventures.

20 17. Knighted Ventures and Bay 101 staff subsequently reviewed video surveillance
21 footage of Respondent's shift and determined the total amount of her theft to be \$5,000.

22 18. Respondent previously held a Gaming Work Permit issued by the San Jose Police
23 Department. As a result of the incident alleged herein, on November 29, 2022, the San Jose
24 Police Department issued a Statement of Decision revoking Respondent's Gaming Work Permit.
25 The Statement of Decision indicates that the San Jose Police Department issued a Notice of Intent
26 to Revoke Respondent's Gaming Work Permit on November 4, 2022, and that Respondent failed
27 to respond timely to the Notice.

28

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Dishonest, Fraudulent, or Deceptive Activities)**

3 19. Respondent is subject to disciplinary action pursuant to Business and Professions
4 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
5 Regulations, title 4, section 12560(c)(2), in that Respondent engaged in dishonest, fraudulent, or
6 deceptive activities in connection with controlled gambling or the provision of player services.
7 Specifically, in September and October 2022, Respondent stole approximately \$5,000 in chips
8 while working for Knighted Ventures at Bay 101 Casino. Complainant refers to and by this
9 reference incorporates the allegations set forth above in paragraphs 14 through 18, inclusive, as
10 though set forth fully herein.

11 **SECOND CAUSE FOR DISCIPLINE**

12 **(Committing Act Punishable as a Crime)**

13 20. Respondent is subject to disciplinary action pursuant to Business and Professions
14 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
15 Regulations, title 4, section 12560(c)(3), in that Respondent committed an act punishable as a
16 crime which substantially relates to the duties and qualifications of the licensee or which occurred
17 in a gambling establishment. Specifically, in September and October 2022, Respondent stole
18 approximately \$5,000 in chips while working for Knighted Ventures at Bay 101 Casino.
19 Complainant refers to and by this reference incorporates the allegations set forth above in
20 paragraphs 14 through 18, inclusive, as though set forth fully herein.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Conduct Inimical to Health, Welfare, or Safety of the General Public)**

23 21. Respondent is subject to disciplinary action pursuant to Business and Professions
24 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
25 Regulations, title 4, section 12560(c)(4), in that Respondent engaged in conduct on the premises
26 of a gambling establishment or in connection with controlled gambling or the provision of
27 proposition player services which is inimical to the health, welfare, or safety of the general
28 public. Specifically, in September and October 2022, Respondent stole approximately \$5,000 in

1 chips while working for Knighted Ventures at Bay 101 Casino. Complainant refers to and by this
2 reference incorporates the allegations set forth above in paragraphs 14 through 18, inclusive, as
3 though set forth fully herein.

4 **FOURTH CAUSE FOR DISCIPLINE**

5 **(Dishonest, Fraudulent, or Unfairly Deceptive Activities)**

6 22. Respondent is subject to disciplinary action pursuant to Business and Professions
7 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
8 Regulations, title 4, section 12560(d)(10), in that Respondent engaged in dishonest, fraudulent, or
9 unfairly deceptive activities in connection with controlled gambling. Specifically, in September
10 and October 2022, Respondent stole approximately \$5,000 in chips while working for Knighted
11 Ventures at Bay 101 Casino. Complainant refers to and by this reference incorporates the
12 allegations set forth above in paragraphs 14 through 18, inclusive, as though set forth fully herein.

13 **FIFTH CAUSE FOR DISCIPLINE**

14 **(Larceny)**

15 23. Respondent is subject to disciplinary action pursuant to Business and Professions
16 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
17 Regulations, title 4, section 12560(d)(12), in that Respondent committed, attempted, or conspired
18 to commit larceny against a gambling licensee or upon the premises of a gambling establishment.
19 Specifically, in September and October 2022, Respondent stole approximately \$5,000 in chips
20 while working for Knighted Ventures at Bay 101 Casino. Complainant refers to and by this
21 reference incorporates the allegations set forth above in paragraphs 14 through 18, inclusive, as
22 though set forth fully herein.

23 **SIXTH CAUSE FOR DISCIPLINE**

24 **(No Longer Meets Criterion for Eligibility for Licensure)**

25 24. Respondent is subject to disciplinary action pursuant to Business and Professions
26 Code sections 19824, subdivision (b), and 19930, in connection with California Code of
27 Regulations, title 4, section 12560(e)(2), in that Respondent no longer meets any criterion for
28 eligibility, pursuant to California Code of Regulations, title 4, section 12040. Specifically, as a

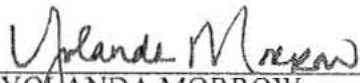
1 result of Respondent's theft of approximately \$5,000 in chips while working for Knighted
2 Ventures at Bay 101 Casino, Respondent is no longer eligible for licensure pursuant to Business
3 and Professions Code sections 19857 and 19859 and California Code of Regulations, title 4,
4 section 12040(a). Complainant refers to and by this reference incorporates the allegations set
5 forth above in paragraphs 14 through 18, inclusive, as though set forth fully herein.

6 **PRAYER**

7 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
8 and that following the hearing, the Commission issue a decision:

- 9 1. Disciplining Third Party Worker Regular License Number TPWK-000127, issued to
- 10 Hanh Thi Huynh;
- 11 2. Ordering Hanh Thi Huynh to pay the California Department of Justice, Bureau of
- 12 Gambling Control, the reasonable costs of the investigation and enforcement of this case,
- 13 pursuant to Business and Professions Code section 19930, subdivision (d)(1); and,
- 14 3. Imposing fines or monetary penalties against Hanh Thi Huynh, according to proof
- 15 and to the maximum extent allowed by law; and
- 16 4. Taking such other and further action as deemed necessary and proper.

17
18
19 DATED: April 19, 2024



YOLANDA MORROW
Director
Bureau of Gambling Control
Department of Justice
State of California
Complainant

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ATTACHMENT B

1 ROB BONTA
 Attorney General of California
 2 NANCY A. KAISER
 Supervising Deputy Attorney General
 3 STEPHEN D. SVETICH
 Deputy Attorney General
 4 State Bar No. 272370
 300 So. Spring Street, Suite 1702
 5 Los Angeles, CA 90013
 Telephone: (213) 269-6734
 6 Facsimile: (916) 731-2126
Attorneys for Complainant


7
 8 **BEFORE THE**
 9 **CALIFORNIA GAMBLING CONTROL COMMISSION**
 10 **STATE OF CALIFORNIA**

11
 12 **In the Matter of the Accusation Against:**

BGC Case No.: BGC-HQ2023-00001AC

13 **HANH THI HUYNH**

**CERTIFICATE OF SERVICE BY
 CERTIFIED MAIL, RETURN RECEIPT
 REQUESTED**

14 
 15 **Third Party Player License No. TPPL-**
 16 **024855,**
 17 **Third Party Worker Regular License No.**
TPWK-000127,

18 **Respondents.**

19
 20 I, Maria Camacho, declare:

21 I am employed in the County of Los Angeles, California. I am 18 years of age or older and
 22 not a party to the within entitled cause; my business address is 300 South Spring Street, Suite
 23 1702 Los Angeles, CA 90013.

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On April 23, 2024, I served the attached:

ACCUSATION; STATEMENT TO RESPONDENT [Gov. Code, § 11505, subd. (b)]; REQUEST FOR DISCOVERY [Gov. Code, § 11507.6]; GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7; and two copies of the NOTICE OF DEFENSE [Gov. Code, §§ 11505 and 11506].

XX (BY CERTIFIED MAIL) I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Sacramento, California. I am readily familiar with the practice of the Office of the Attorney General for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

Jordan Aman, Designated Agent
645 W. 9th St. Unit 110-425
Los Angeles, CA 90015

Hanh Thi Huynh
[Redacted]

Certified Article Number

9414 7266 9904 2226 4644 49

SENDER'S RECORD


Certified Article Number

9414 7266 9904 2226 4644 56

SENDER'S RECORD

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on April 23, 2024, at Los Angeles, California.

MARIA CAMACHO
Declarant


Signature