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BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Approval
of Employee Category License: Third-Party
Proposition Player Service Worker License
Regarding:

AUDREY STEVENS

Respondent.

CGCC Case No. CGCC-2023-1102-4Aii
BGC Case No. BGC-HQ2023-00013AL

DECISION AND ORDER

Hearing Date: November 22, 2024
Time: 10:00 a.m.

This matter was heard by the California Gambling Control Commission (Commission) pursuant to Business and Professions Code sections 19870 and 19871, and title 4, California Code of Regulations (CCR) section 12060, via Zoom video conference, on November 22, 2024.

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

Audrey Stevens (Stevens) appeared on her own behalf during the evidentiary hearing.

During the evidentiary hearing, Presiding Officer Kate Patterson (PO Patterson), Attorney IV of the Commission, took official notice and admitted into the administrative record the following documents: the Commission’s Notice and Agenda of Commission Hearing; the Commission’s Conclusion of Prehearing Conference letter; the Commission’s Notice of Hearing and Prehearing Conference with attachments (A) Stevens’ Application for Employee Category License with a Commission Work Permit or Third-Party Proposition Player Services Worker: Supplemental Information form (Supplemental) (collectively, Application), and (B) the Bureau’s Background Investigation Report; the Bureau’s Statement of Reasons; and Stevens’ signed Notice of Defense form.

During the evidentiary hearing, pursuant to a stipulation between the parties, PO Patterson accepted into evidence: (1) Exhibits 1-16 Bates Nos. BGC 001- BGC 103, offered by the Bureau and identified on the Bureau’s Evidentiary Exhibit Index; and (2) Exhibit A, offered by Stevens.

FINDINGS OF FACT

Procedural History

1. Stevens has been employed by third-party proposition player services provider Global Player Services, Inc. (Global) since November 18, 2022.

2. The Commission issued temporary third-party proposition player worker license number TPWK-005549 to Stevens for her employment as a third-party proposition player for Global.

3. On or about November 28, 2022, the Bureau received the Application from Stevens to continue work as a third-party proposition player for Global.

4. On or about September 8, 2023, the Commission received a Third-Party Worker Initial Background Investigation Report, Level III, (Background Report) on Stevens from the Bureau. In its Background Report, the Bureau alleges that Stevens failed to establish eligibility and qualification for licensure because she was convicted of three misdemeanor offenses, failed to disclose one of the convictions, and is the subject of a protection order. Based on the foregoing, the Bureau recommends that the Commission deny Stevens' Application.

5. At its meeting on November 2, 2023, the Commission voted to consider Stevens' Application at a Gambling Control Act (GCA) evidentiary hearing pursuant to CCR section 12060. On November 2, 2023, the Commission notified Stevens of its action to refer her Application to a GCA hearing and provided her with a Notice of Defense form.

6. On or about December 1, 2023, Stevens submitted a completed Notice of Defense form to the Commission and the Bureau requesting an evidentiary hearing.

7. On July 1, 2024, the Commission notified Stevens that an evidentiary hearing would be held via Zoom video conference before the Commission starting at 10:00 a.m., on November 22, 2024. Stevens was also notified that a prehearing conference would be held on October 11, 2024.

8. In July 2024, the Bureau sent a Statement of Reasons to Stevens and to the Commission. In the Statement of Reasons, the Bureau alleges two causes for denial of Stevens' Application: (1) she failed to disclose material information (one misdemeanor conviction) on her

1 Application; and (2) she failed to establish that she is a person of good character, honesty, and
2 integrity because she failed to make full and true disclosures on her Application as required by
3 the GCA, and supplied information that is untrue or misleading. The Bureau also alleges that
4 Stevens failed to establish that her prior activities, criminal record, and habits do not pose a threat
5 to the public interest of this state, or to the effective regulation and control of controlled
6 gambling. Based on the foregoing, the Bureau requests that the Commission deny Stevens'
7 Application.

8 9. On October 11, 2023, the noticed prehearing conference was held before PO
9 Patterson. Stevens and her designated agent, Lisa Rodrigues (Rodrigues) attended the prehearing
10 conference. DAG Svetich attended on behalf of the Bureau.

11 10. On October 11, 2023, PO Patterson sent a Conclusion of Prehearing Conference letter,
12 via email, to Stevens and DAG Svetich.

13 11. The Commission heard this matter via Zoom video conference on November 22, 2024.
14 PO Patterson closed the administrative record, and the matter was submitted for decision on
15 November 22, 2024.

16 **Bureau's Findings**

17 12. The Bureau conducted an initial background investigation with respect to
18 Stevens' Application. The Bureau's Background Report and Statement of Reasons state that
19 Stevens:

- 20 a. Sustained one misdemeanor criminal conviction for violating Vehicle Code section
21 23152, subdivision (b) (driving with a BAC greater than 0.08%) in 2006;
- 22 b. Sustained one misdemeanor criminal conviction for violating Vehicle Code section
23 23152, subdivision (b) (driving with a BAC greater than 0.08%) in 2008; and
- 24 c. Sustained one misdemeanor criminal conviction for violating Penal Code section
25 242 (battery) in 2008;
- 26 d. Failed to disclose the 2008 battery conviction in her Application; and
- 27 e. On August 1, 2022, the Salinas Police Department issued a protective order
28 prohibiting Stevens from having contact with the subject of the order.

1 **Stevens' Disclosures of Prior Convictions and Pending Action on the Application**

2 13. Stevens' Application consists of two parts. The first part is three pages and contains
3 five sections, including applicant information. The instructions provide that "all responses must
4 be truthful and complete" and that any "misrepresentation or failure to disclose required
5 information or documentation may constitute cause for denial of the application or discipline of
6 the licensee." (Emphasis in original). In section 3 of the first part of the Application, even though
7 it was not applicable to her because she was filing an initial application and not a renewal
8 application, Stevens marked "Yes" to the question: Have you been convicted of any crime
9 (misdemeanor or felony) since last filing a license or Commission work permit application.
10 Stevens signed the Application on November 18, 2022.

11 14. The second part of the Application is the Supplemental, which is eight pages and
12 contains nine sections. The instructions on the Supplemental also provide that all "responses must
13 be truthful and complete" and that any "misrepresentation or failure to disclose required
14 information or documentation may constitute cause for denial of the application or discipline of
15 the licensee." (Emphasis in original). The Supplemental requires that the applicant disclose,
16 among other things, all criminal conviction(s).

17 15. Section (3) of the Supplemental makes inquiries about an applicant's military
18 experience. Among other questions it asks: "Have you ever been convicted in a court-martial?"
19 Even though Stevens had not served in the military, she marked "Yes" to the question above and
20 revealed that there was an "open" "DV" matter pending in Salinas, California for an incident that
21 occurred on July 31, 2022. The Bureau asked Stevens to explain the discrepancy between the fact
22 that she answered "no" to having any military experience but answered "yes" to the related
23 question: "Have you ever been convicted in a court-martial?" Stevens responded: "I have not
24 been convicted in a court-martial. Accidental typo meant NO."

25 16. Section (4) of the Supplemental requires an applicant to disclose any and all criminal
26 convictions other than "infractions, i.e. speeding or parking tickets," and any conviction sealed
27 pursuant to a court order. It also requires an applicant to reveal the "approximate date of
28 conviction" if an applicant has suffered any conviction(s).

1 17. On the Supplemental, Stevens checked the box marked “Yes” to the question have
2 “you **ever** been convicted or pled guilty or nolo contendere (no contest) to a misdemeanor or
3 felony?” (Emphasis in original). On the Supplemental, she disclosed the two driving under the
4 influence of alcohol convictions, one she dated to be “10/2/2006” the other “10/3/2007.” In fact,
5 the correct date for these convictions was October 3, 2006, and February 19, 2008, respectively.
6 She also disclosed a “DV” conviction that occurred on the approximate date of “06/2010” in
7 Carmel, California. The Bureau’s investigation revealed that Stevens suffered a domestic violence
8 related conviction (for battery) on October 17, 2008.

9 18. Section (9) of the Supplemental is a Declaration, signed by Stevens on
10 November 18, 2022, in which Stevens declared under penalty of perjury that the information
11 provided in the Supplemental was “true, accurate, and complete.”

12 **Stevens’ Communications with the Bureau About the Conviction for Battery**

13 19. During its background investigation of the Application, the Bureau found that
14 on January 8, 2014, the court set aside and dismissed the 2008 conviction for battery pursuant to
15 Penal Code section 1203.4. The Bureau asked Stevens to provide a statement regarding the
16 circumstances that led to her conviction for battery. Stevens provided the requested statement.
17 The Bureau obtained a copy of the Monterey County Sheriffs’ report for the incident that led to
18 Stevens’ conviction for battery. According to the Bureau, this report substantiated Stevens’
19 statements to the Bureau about the conviction for battery.

20 20. The Bureau also asked Stevens to provide information explaining why she failed to
21 disclose the criminal conviction for violating Penal Code section 242 (battery) in 2008 on the
22 Application. Stevens informed the Bureau that: “I inadvertently failed to disclose this conviction
23 on the supplemental information form because I thought I was only to provide information for the
24 last 10 years.”

25 **Stevens’ Communications with the Bureau About the Protective Order**

26 21. On August 1, 2022, Stevens became the subject of a protection order. The order
27 prohibited Stevens from having contact with the victim. On March 9, 2023, the Bureau contacted
28 the Salinas Police Department and was informed that the order has not been violated and that the

1 order was terminated by the court on February 2, 2023. Stevens provided a statement regarding
2 the circumstances that led to the issuance of the order. The Bureau obtained a copy the Salinas
3 Police Department's report and Stevens' statement to the Salinas Police Department was
4 consistent with the statement to the Bureau.

5 **Stevens' Testimony During the Evidentiary Hearing**

6 22. During the evidentiary hearing, Stevens testified that she is a person of honesty,
7 integrity and good character. Stevens works for Global and as a care provider under the state's In-
8 Home Support Services Program. Stevens insists that she disclosed all convictions she has
9 suffered. Stevens testified that she disclosed her 2008 conviction for battery when she disclosed
10 on the Supplemental that she suffered a "DV" conviction that occurred on the approximate date of
11 "06/2010" in Carmel, California. When asked why she stated to the Bureau that she failed to
12 disclose the 2008 conviction for battery on the supplemental information form because she
13 thought only convictions within the last ten years were required, Stevens testified that she
14 assumed the Bureau's application was similar to other applications she had filled out for other
15 employers where only the last ten years were relevant.

16 23. Even though she determined that convictions within the last ten years were relevant,
17 Stevens testified that she went to the court's website to look for the correct dates of all of her
18 prior convictions before filing the Application. Stevens did not see any type of report with a
19 record of her convictions on the court's website, so her disclosures were based on memory rather
20 than any court-issued documentation. Even though the records of the DV (domestic violence)
21 charge were sealed Stevens listed it on the Application. Stevens also testified that she did not
22 remember the exact date of her convictions and that she should have been clearer about that
23 before responding to the Bureau. Stevens took responsibility for not making it clear that when she
24 disclosed the "06/2010" conviction for a "DV" she was referring to the conviction for battery in
25 2008.

26 24. Stevens stated she was not trying to hide any of her convictions. Stevens testified that
27 she filled out the Application on her own. During the hearing, Stevens also voluntarily revealed a
28 recent conviction for driving under the influence of alcohol. Stevens testified that she has no

1 derogatory work history in the gambling industry.

2 **Letters and Testimony Supporting Stevens' Application**

3 25. Stevens submitted one letter from Rodrigues, a shareholder of Global, in support of
4 the Application. The letter from Rodrigues states that: "During her tenure with GPS, Stevens has
5 been an excellent member of our team. Audrey takes her job seriously and has demonstrated
6 excellent game knowledge and ensures game integrity. She's dependable, honest, hard-working
7 and has good judgement at work."

8 26. Rodrigues also testified during the evidentiary hearing. Rodrigues, who oversees two
9 locations for Global testified that she has heard from her on-site managers that Stevens is
10 dependable and has been a good employee. Stevens ensures game integrity and hopes the
11 Commission approves her license. Stevens is a hard worker and an asset to Global. Rodrigues is
12 responsible for handling human resources-related issues that are elevated to her. Rodrigues is not
13 concerned about Stevens' three convictions or the recent driving under the influence conviction.
14 Her testimony was supportive of Stevens' Application and expressed a desire for its approval.
15 Rodrigues' letter and testimony demonstrate that Stevens is a valuable employee and reveal that
16 she is well regarded by her employer and coworkers.

17 **Bureau's Testimony**

18 27. Jerrico Crisologo, one of the managers overseeing the investigation of Stevens'
19 Application, testified that Stevens did not disclose the 2008 conviction for battery on the
20 Application. Initially, the Bureau surmised that Stevens may have made an error and meant to
21 actually list the 2008 conviction for battery when she listed the 2010 "DV" conviction, but since
22 Stevens responded that she "inadvertently failed to disclose this conviction on the supplemental
23 information form "because I thought I was only to provide information for the last 10 years," the
24 Bureau never inquired about the 2010 "DV" conviction that Stevens listed on the Application.

25 28. So as not to lead an applicant into providing self-serving answers, the Bureau does not
26 seek clarification about disclosures of convictions on an application that are inconsistent with
27 what the Bureau discovers during its background investigation. According to the Bureau, in this
28 instance, "DV" of 2010 could mean a lot of different things, so the Bureau did not assume the

1 2010 “DV” conviction listed by Stevens on the Application was actually a reference to the 2008
2 conviction for battery that it found was willfully omitted by Stevens from the Application.

3 APPLICABLE STATUTORY AND REGULATORY PROVISIONS

4 29. Division 1.5 of the Business and Professions Code, the provisions of which govern the
5 denial of licenses on various grounds, does not apply to licensure decisions made by the
6 Commission under the Gambling Control Act. (Bus. & Prof. Code, § 476, subd. (a).)

7 30. The Act is an exercise of the police power of the state for the protection of the health,
8 safety, and welfare of the people of the State of California, and shall be liberally construed to
9 effectuate those purposes. (Bus. & Prof. Code, § 19971.)

10 31. Public trust that permissible gambling will not endanger public health, safety, or
11 welfare requires that comprehensive measures be enacted to ensure that gambling is free from
12 criminal and corruptive elements, that it is conducted honestly and competitively, and that it is
13 conducted in suitable locations. (Bus. & Prof. Code, § 19801, subd. (g).)

14 32. Public trust and confidence can only be maintained by strict and comprehensive
15 regulation of all persons, locations, practices, associations, and activities related to the operation
16 of lawful gambling establishments. (Bus. & Prof. Code, § 19801, subd. (h).)

17 33. The Commission has the responsibility of assuring that licenses, approvals, and
18 permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose
19 operations are conducted in a manner that is inimical to the public health, safety, or welfare. (Bus.
20 & Prof. Code, § 19823, subd. (a)(1).)

21 34. An “unqualified person” means a person who is found to be unqualified pursuant to
22 the criteria set forth in Section 19857, and “disqualified person” means a person who is found to
23 be disqualified pursuant to the criteria set forth in Section 19859. (Bus. & Prof. Code, §
24 19823, subd. (b).)

25 35. The Commission shall have all powers necessary and proper to enable it fully and
26 effectually to carry out the policies and purposes of this chapter. (Bus. & Prof. Code, § 19824.)

27 36. The Commission has the power to deny any application for a license, permit, or
28 approval for any cause deemed reasonable by the Commission. (Bus. & Prof. Code, § 19824,

1 subd. (b).)

2 37. The Commission has the power to take actions deemed to be reasonable to ensure that
3 no ineligible, unqualified, disqualified, or unsuitable persons are associated with controlled
4 gambling activities. (Bus. & Prof. Code, § 19824, subd. (d).)

5 38. The burden of proving her or his qualifications to receive any license from the
6 Commission is on the applicant. (Bus. & Prof. Code, § 19856, subd. (a); CCR, § 12060, subd.
7 (j).)

8 39. An application to receive a license constitutes a request for a determination of the
9 applicant's general character, integrity, and ability to participate in, engage in, or be associated
10 with, controlled gambling. (Bus. & Prof. Code, § 19856, subd. (b).)

11 40. In reviewing an application for any license, the Commission shall consider whether
12 issuance of the license is inimical to public health, safety, or welfare, and whether issuance of the
13 license will undermine public trust that the gambling operations with respect to which the license
14 would be issued are free from criminal and dishonest elements and would be conducted honestly.
15 (Bus. & Prof. Code, § 19856, subd. (c).)

16 41. No gambling license shall be issued unless, based on all of the information and
17 documents submitted, the Commission is satisfied that the applicant is a person of good character,
18 honesty, and integrity. (Bus. & Prof. Code, § 19857, subd. (a).)

19 42. No gambling license shall be issued unless, based on all of the information and
20 documents submitted, the Commission is satisfied that the applicant is a person whose prior
21 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the
22 public interest of this state, or to the effective regulation and control of controlled gambling, or
23 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in
24 the conduct of controlled gambling or in the carrying on of the business and financial
25 arrangements incidental thereto. (Bus. & Prof. Code, § 19857, subd. (b).)

26 43. No gambling license shall be issued unless, based on all of the information and
27 documents submitted, the Commission is satisfied that the applicant is a person that is in all other
28 respects qualified to be licensed as provided in this chapter. (Bus. & Prof. Code, § 19857, subd.

1 (c.)

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

7 45. An application will be denied if the Commission finds that the applicant has not
8 satisfied the requirements of Business and Professions Code section 19857. (CCR, § 12040, subd.
9 (a)(1).)

10 46. An application will be denied if the Commission finds that any of the provisions of
11 Business and Professions Code section 19859 apply to the applicant. (CCR, § 12040, subd.
12 (a)(2).)

13 47. This evidentiary hearing need not be conducted according to technical rules relating to
14 evidence and witnesses. Any relevant evidence may be considered, and is sufficient in itself to
15 support a finding, if it is the sort of evidence upon which reasonable persons are accustomed to
16 rely upon in the conduct of serious affairs, regardless of the existence of any common law or
17 statutory rule that might make improper the admission of the evidence over objection in a civil
18 action. (Bus. & Prof. Code, § 19871, subd. (a)(4); CCR, § 12060, subd. (g)(2).)

19 48. An applicant for licensing or for any approval or consent required by this chapter,
20 shall make full and true disclosure of all information to the Bureau and the Commission as
21 necessary to carry out the policies of this state relating to licensing, registration, and control of
22 gambling. (Bus. & Prof. Code, § 19866.)

23 49. The Bureau relies, in large part, on the applicant's disclosures while conducting a
24 background investigation. The failure to honestly, accurately, and completely disclose
25 information on an application subverts the Bureau's efforts to conduct a thorough and complete
26 investigation. (Bus. & Prof. Code, §§ 19826, subd. (a), 19866.)

27 50. Both the substance of an applicant's disclosures, and the truthfulness and
28 thoroughness of an applicant's disclosures, are considered by the Bureau in making a

1 recommendation as to the applicant’s suitability for licensure, and by the Commission in making
2 a determination whether to approve or deny a license application. (Bus. & Prof. Code, §§ 19824,
3 subs. (a), (d), 19826, subd. (a), and 19866.)

4 ASSESSMENT OF STEVENS’ SUITABILITY FOR LICENSURE

5 51. For the reasons stated below, cause does not exist to deny Stevens’ Application. The
6 Commission finds that Stevens is not disqualified or unqualified for licensure under the GCA.

7 **Stevens is Not Disqualified Under the GCA**

8 52. The Commission finds that although Stevens did not disclose the exact dates of her
9 criminal convictions, she in fact disclosed all three of her known convictions, voluntarily
10 disclosed a fourth conviction for driving under the influence that she suffered in 2024, and
11 disclosed an “open” case that led to issuance of a protective order against her. By making all
12 derogatory disclosures on the Application, Stevens: (1) provided information required by the
13 GCA and its implementing regulations; (2) revealed facts material to qualification to the Bureau
14 and the Commission; and/or (3) did not supply untrue or misleading information as to a material
15 fact pertaining to the qualification criteria. (Bus. & Prof. Code, § 19859, subd. (b).)

16 53. The Commission finds credible Stevens’ testimony that when she disclosed a “DV”
17 conviction that occurred on the approximate date of “06/2010” in Carmel, California, she was
18 actually referring to the 2008 conviction for battery that the Bureau determined was omitted from
19 the Application, because: (1) the incident that led to her 2008 conviction for battery occurred in
20 Carmel, California; (2) none of her other convictions were connected to any incidents in Carmel,
21 California; and (3) there was no objective reason for Stevens to omit the 2008 conviction for
22 battery yet list a nonexistent 2010 “DV” conviction on the Application.

23 54. Overall, the Commission further finds that the omission that is one of the bases for the
24 Bureau’s recommendation for denying the Application was not intentional. Admittedly, Stevens
25 did not help her cause when she responded to the Bureau in a manner that indicated she failed to
26 disclose the 2008 conviction rather than indicating that the 2008 conviction was disclosed with
27 the incorrect 2010 date. Stevens’ acknowledgement to the Bureau that she failed to disclose the
28 2008 conviction for battery combined with the fact that the Bureau found Stevens had not

1 suffered any conviction in 2010 led the Bureau to ignore its initial surmise that Stevens
2 mistakenly listed the 2010 “DV” conviction when she should have listed it as a 2008 conviction.
3 However, the evidentiary hearing revealed that this should not have been the end of the inquiry.
4 Further examination revealed that Stevens’ notation of a conviction in 2010 for “DV” was in fact
5 a reference to the conviction that the Bureau found was omitted from the Application. Had
6 Stevens suffered two convictions in Carmel, California—one in 2008 and another in 2010, the
7 Bureau’s position that she intentionally omitted the 2008 conviction for battery would have more
8 force. But on this record we cannot say that she is disqualified for licensure under the GCA for
9 omitting the battery conviction she suffered in 2008.

10 55. Overall, Stevens made the required disclosures on the Application and to the Bureau.
11 She disclosed three misdemeanors, the “approximate” date of the convictions, the arresting
12 agencies, and a description of the factual circumstances that led to the convictions. Importantly,
13 after the Bureau asked Stevens to provide a statement regarding the circumstances that led to her
14 conviction for battery in 2008, Stevens provided the requested statement which matched the
15 description of the incident from the related police report obtained by the Bureau. Similarly, in
16 connection with the protective order issued against Stevens on August 1, 2022 (which was
17 terminated by the court on February 2, 2023), Stevens provided a truthful statement regarding the
18 circumstances that led to the issuance of the order that was consistent with the related police
19 report obtained by the Bureau.

20 56. Accordingly, Stevens did not fail to reveal facts material to qualification to the
21 Bureau or the Commission. Accordingly, Stevens’ Application is not subject to denial pursuant to
22 Business and Professions Code section 19859, subdivision (b), or CCR section 12040,
23 subdivision (a)(2).

24 **Stevens is Not Unqualified Under the GCA**

25 57. An applicant may demonstrate good character, honesty, and integrity by providing
26 truthful, accurate, and complete responses on their application and supplemental, in response to
27 Bureau inquiries during the Bureau’s background investigation, and/or while testifying during the
28 evidentiary hearing before the Commission.

1 58. Conversely, an applicant may demonstrate a lack of good character, honesty, and
2 integrity by omitting pertinent information, and providing untrue, misleading, and/or
3 contradictory information on their application and supplemental, in response to Bureau inquiries,
4 and/or while testifying during the evidentiary hearing before Commission.

5 59. On her Application, correspondence with the Bureau, and during her testimony
6 before the Commission, Stevens did not fail to meet her burden of proving that she is a person of
7 good character, honesty, and integrity. In fact, Stevens made a compelling case that she possesses
8 the ability to participate in controlled gambling, and that the issuance of a license to her would
9 not be inimical to public health, safety, or welfare, or undermine public trust that the gambling
10 operations with respect to which the license would be issued are free from criminal and dishonest
11 elements, and would be conducted honestly. Specifically, Stevens: (1) provided all derogatory
12 information that led to legal actions against her; (2) provided honest responses about her criminal
13 convictions; (3) did not omit any convictions from her Application; (4) provided a truthful
14 statement to the Bureau regarding the circumstances that led to her conviction for battery in 2008;
15 (5) similarly, in connection with the protective order issued against Stevens on August 1, 2022
16 (which was terminated by the court on February 2, 2023), Stevens provided a truthful statement to
17 the Bureau regarding the circumstances that led to the issuance of the order; (6) admitted she was
18 wrong in failing to disclose the exact date of her convictions on the Application; and (7) provided
19 a persuasive letter and testimony by Rodrigues in support of her Application. Therefore, the
20 Application is not subject to denial pursuant to Business and Professions Code section 19857,
21 subdivision (a), and CCR section 12040, subdivision (a)(1).

22 **Stevens is Not Unqualified Under the GCA**

23 60. The Commission finds that Stevens' prior activities, criminal record, and habits do not
24 pose a threat to the public interest of this state, or to the effective regulation and control of
25 controlled gambling. Stevens is qualified to receive the applied for license.

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

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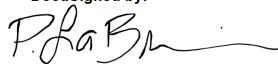
ORDER

- 1. Audrey Stevens' Application for Employee Category License: Third-Party Proposition Player Service Worker License is APPROVED.
- 2. No costs are awarded.
- 3. Each side to pay its own attorneys' fees.

This Order is effective on February 10, 2025.

Dated: 1/9/2025


Signature: _____

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Paula LaBrie, Chair

Dated: 1/9/2025


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Stacey Luna Baxter, Commissioner

Dated: 1/9/2025


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Eric Heins, Commissioner

Dated: 1/9/2025


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William Liu, Commissioner

Dated: 1/9/2025

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Edward Yee, Commissioner