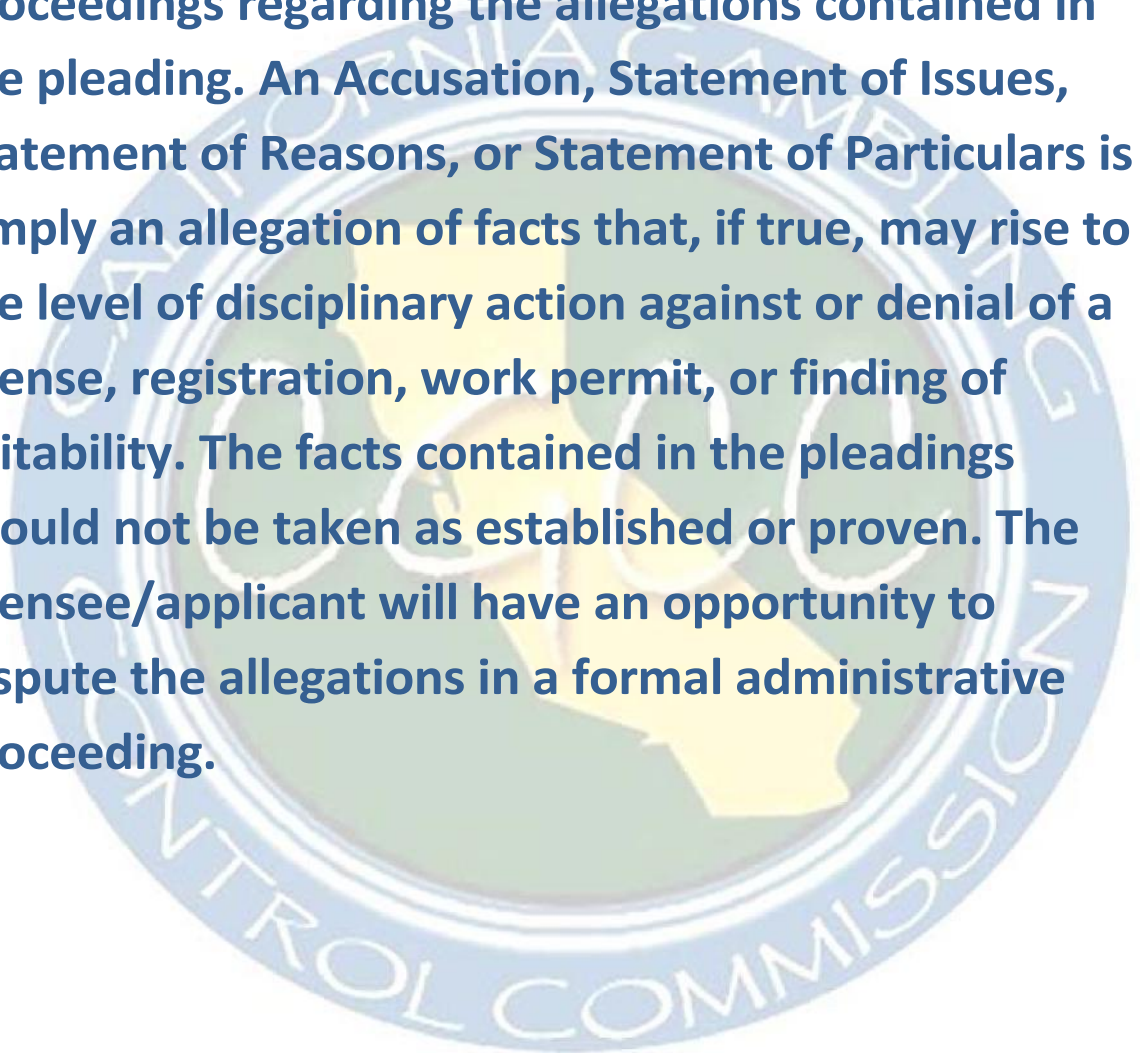


The Commission is providing a copy of this pleading (Accusation, or Statement of Reasons, Statement of Particulars, or Statement of Issues) so the public is as informed as possible of pending administrative proceedings regarding the allegations contained in the pleading. An Accusation, Statement of Issues,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



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

11 In the Matter of the Statement of Particulars
Against:

12 **OAKDALE, LLC DBA MIKE'S CARD**
13 **CASINO; ROY CHOI, MANAGING**
14 **MEMBER**
[REDACTED]

15 Respondent.

BGC Case No. BGC-HQ2025-00001AL

CGCC Case No. CGCC-2024-1219-4E

STATEMENT OF PARTICULARS

Hearing Date: May 19, 2026

Hearing Time: 10:00 a.m.

Hearing Place: 2399 Gateway Oaks, Ste. 220,
Sacramento, CA 95833

**This hearing will be conducted by means of
video conferencing on Zoom. The Zoom
meeting code is 285 757 8614.**

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20 **THE PARTIES AND THIS PROCEEDING**

21 1. Yolanda Morrow (Complainant) brings this Statement of Particulars solely in her
22 official capacity as Director of the California Department of Justice, Bureau of Gambling Control
23 (Bureau).

24 2. On June 11, 2020, the Commission issued a Cardroom Owner Person License to Roy
25 Choi (GEOW-003985). On October 20, 2022, the California Gambling Control Commission
26 (Commission) issued a Cardroom Business License to Mike's Card Casino (GEGE-001364). On
27 December 19, 2024, the Commission issued a Cardroom Owner Entity License to Oakdale, LLC
28 (GEOW-003984).

1 unqualified or disqualified persons and that no unqualified or disqualified person is materially
2 involved with a licensed gambling operation. (Bus. & Prof. Code, § 19823, subd. (a).) The
3 Commission has all powers necessary and proper to carry out the Act’s policies and purposes,
4 including the powers to take actions to ensure that no ineligible, unqualified, disqualified, or
5 unsuitable persons are associated with controlled gambling activities. (Bus. & Prof. Code, §
6 19824, subds. (b) & (d).)

7 9. Respondent has the burden of proving that they are qualified to receive a license.
8 (Bus. & Prof. Code, § 19856, subd. (a).)

9 **LICENSURE CONSIDERATIONS**

10 10. On March 12, 2024, Respondent declared on the Spousal Information form under
11 penalty of perjury that the owner category licensee is his sole and separate property.

12 11. On or about March 26, 2024, and April 4, 2024, the Bureau requested Respondent to
13 provide supporting documentation that demonstrates the acquisition of his interest in Oakdale,
14 LLC as his sole and separate property.

15 12. On or about April 30, 2024, in response to the Bureau’s request, Respondent
16 informed the Bureau: “This was marked in error. The property is common property.”

17 13. On or about May 9, 2024, the Bureau received another Spousal Information form
18 from Respondent. Respondent again declared under penalty of perjury that “the owner category
19 licensee is the sole and separate property of the applicant.”

20 14. On or about May 21, 2024, the Bureau again requested supporting documentation.
21 The Bureau also referred Respondent to section 4 of the Spousal Information form for acceptable
22 documents and the Industry Guidance for documenting a Sole and Separate Property Interest on
23 the Commission’s website.

24 15. On June 13, 2024, the Bureau sent its final notice requesting the supporting
25 documentation.

26 16. On or about December 13, 2024, the Bureau received a Postnuptial Agreement signed
27 by Respondent and his spouse, dated December 13, 2024.

28 ///

APPENDIX A

BUSINESS AND PROFESSIONS CODE

1. Business and Professions Code section 19805 provides, in part:

(b) "Applicant" means a person who has applied for a state gambling license, a key employee license, a registration, a finding of suitability, a work permit, a manufacturer's or distributor's license, or an approval of any act or transaction for which the approval or authorization of the commission or department is required or permitted under this chapter.

* * *

(o) "Gambling establishment," "establishment," or "licensed premises," except as otherwise defined in Section 19812, means one or more rooms where a controlled gambling or activity directly related to controlled gambling occurs.

(p) "Gambling license" or "state gambling license" means a license issued by the state that authorizes the person named therein to conduct a gambling operation.

* * *

(z) "License" means a gambling license, key employee license, or any other license issued by the commission pursuant to this chapter or regulations adopted pursuant to this chapter.

* * *

(ad) "Owner licensee" means an owner of a gambling enterprise who holds a state gambling license.

(ae) "Person," unless otherwise indicated, includes a natural person, corporation, partnership, limited partnership, trust, joint venture, association, or any other business organization.

* * *

(aj) "Renewal license" means the license issued to the holder of an initial license that authorizes the license to continue beyond the expiration date of the initial license.

2. Business and Professions Code section 19811, subdivision (b), provides:

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

3. Business and Professions Code section 19823 provides:

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

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

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

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

4. Business and Professions Code section 19824 provides, in part:

The commission shall have all powers necessary and proper to enable it fully and effectually to carry out the policies and purposes of this chapter,¹ 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 individual owner endorsed on the license certificate of the gambling enterprise whether or not the commission takes action against the license of the gambling enterprise.

* * *

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

5. Business and Professions Code section 19850 provides, in part:

Every person who, either as owner, lessee, or employee, whether for hire or not, either solely or in conjunction with others, deals, operates, carries on, conducts, maintains, or exposes for play any controlled game in this state, or who receives directly or indirectly, any compensation or reward, or any percentage or share of the money or property played, for keeping, running, or carrying on any controlled game in this state, shall apply for and obtain from the commission, and shall thereafter maintain, a valid state gambling license, key employee license, or work permit, as specified in this chapter.

¹ “Chapter” refers to Business and Professions Code, division 8, chapter 5, (commencing with section 19800), also known as the Gambling Control Act.

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

The commission, by regulation or order, may require that the following persons register with the commission, apply for a finding of suitability as defined in subdivision (i) of 19805, or apply for a gambling license:

* * *

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

7. Business and Professions Code, section 19854 provides, in part:

(a) Every key employee shall apply for and obtain a key employee license.

(b) No person may be issued a key employee license unless the person would qualify for a state gambling license.

8. Business and Professions Code section 19856 provides:

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

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

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

9. Business and Professions Code section 19857 provides:

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

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

(b) A person whose prior activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the public interest of this state, or to the effective regulation and control of controlled gambling, or create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in the conduct of

1 controlled gambling, or in the carrying on of the business and financial
2 arrangements incidental thereto.

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

5 10. Business and Professions Code section 19859 provides, in part:

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

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

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

15 11. Business and Professions Code section 19866 provides:

16 An applicant for licensing or for any approval or consent required
17 by this chapter, shall make full and true disclosure of all information
18 to the department and the commission as necessary to carry out the
19 policies of this state relating to licensing, registration, and control of
20 gambling.

21 12. Business and Professions Code section 19870 provides:

22 (a) The commission, after considering the recommendation of the
23 chief² and any other testimony and written comments as may be
24 presented at the meeting, or as may have been submitted in writing to
25 the commission prior to the meeting, may either deny the application
26 or grant a license to an applicant who it determines to be qualified to
27 hold the license.

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

(c) If, during a meeting, the commission denies an application,
denies approval, or approves with limits, restrictions, or conditions,
the action shall be stayed for a period of 30 days after the meeting,
during which the applicant may request an evidentiary hearing. If the
applicant does not file a request for an evidentiary hearing within 30
days, the action of the commission taken at the meeting is final. If the
applicant waives the right to hearing and assents to the action of the
commission in writing, upon receipt of the waiver by the commission,
the action shall no longer be stayed. If the applicant files a timely

² “Chief” refers to the Director of the Bureau. (Bus. & Prof. Code, § 19805, subd. (d).)

1 request for an evidentiary hearing, the action shall be vacated and the
application shall be reviewed de novo at the evidentiary hearing.

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

3 (e) All proceedings at a meeting of the commission relating to a
4 license application shall be recorded stenographically or by audio or
5 video recording.

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

10 13. Business and Professions Code section 19871 provides:

11 (a) An evidentiary hearing described in Section 19870 shall be
12 conducted in accordance with regulations of the commission and as
follows:

13 (1) Oral evidence shall be taken only upon oath or
14 affirmation.

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

16 (A) To call and examine witnesses.

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

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

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

22 (E) To offer rebuttal evidence.

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

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

1 improper the admission of that evidence over objection in a civil
2 action.

3 (b) This section does not confer upon an applicant a right to
4 discovery of the department's³ investigative reports or to require
5 disclosure of any document or information the disclosure of which is
6 otherwise prohibited by any other provision of this chapter.

7 CALIFORNIA CODE OF REGULATIONS

8 14. California Code of Regulations, title 4, section 12040, subdivision (a) provides, in
9 part:

10 An application for an initial or renewal license:

11 (1) Will be denied if the Commission finds that the applicant
12 has not satisfied the requirements of Business and Professions
13 Code section 19857; or,

14 (2) Will be denied if the Commission finds that any of the
15 provisions of Business and Professions Code section 19859 apply
16 to the applicant.

17 15. California Code of Regulations, title 4, section 12054 provides:

18 (a) At a Commission meeting, the Commission may take, but is not limited to
19 taking, one of the following actions:

20 (1) Issue a license, temporary license, interim license, registration, permit, finding
21 of suitability, renewal or other approval.

22 (2) Issue a license, work permit, finding of suitability, or other approval with
23 conditions, restrictions, or limitations, and for a renewal application, issue an interim
24 renewal license pursuant to Section 12035.

25 (3) Deny an application for a license, work permit, finding of suitability, or other
26 approval, and for a renewal application, issue an interim renewal license pursuant to
27 Section 12035.

28 (4) Elect to hold or retract an evidentiary hearing in accordance with
Section 12056 and, for a renewal application, issue an interim renewal license pursuant to
Section 12035. The Commission will identify those issues for which it requires additional
information or consideration related to the applicant's suitability.

(5) Table or continue an item for consideration at a subsequent meeting, for any
purpose, including obtaining new or additional information from the applicant, Bureau or
Commission staff, provided that in the case of renewal applications, the Commission must
act on the application before the license expires.

3 "Department" refers to the Department of Justice. (Bus. & Prof. Code, § 19805, subd.
(h).)

1 (6) Extend a cardroom category license, TPPPS category license, registration, or
2 finding of suitability for up to 180 calendar days, as necessary, if an applicant has
3 submitted their renewal application prior to the original expiration date of the current
4 license, Commission work permit, registration, or finding of suitability, and the
5 Commission is unable to act on the application prior to the expiration date.

6 (7) Approve or deny a request for withdrawal pursuant to Section 12015.

7 (8) Make a finding of abandonment pursuant to subsection (c) of Section 12017.

8 (9) If the Bureau has filed an accusation with the Commission pursuant to
9 Business and Professions Code section 19930 prior to Commission action on a renewal
10 application, the Commission will issue an interim renewal license pursuant to
11 Section 12035.

12 (10) Issue a default decision pursuant to Section 12057.

13 (11) Consider a request for reconsideration pursuant to Section 12064.

14 (b) An applicant does not have a right to an evidentiary hearing pursuant to
15 Section 12056 if the Commission approves or denies a request for withdrawal pursuant to
16 paragraph (5) of subsection (a) or makes a finding of abandonment pursuant to paragraph
17 (6) of subsection (a), and that decision is final when issued, unless the Commission
18 specifies otherwise.

19 16. California Code of Regulations, title 4, section 12056, subdivision (a) provides, in
20 part:

21 If the Commission elects to hold an evidentiary hearing, the
22 hearing will be conducted as a GCA hearing under Section 12060,
23 unless the Executive Director or the Commission determines the
24 hearing should be conducted as an APA hearing under Section
25 12058

26 17. California Code of Regulations, title 4, section 12060, provides:

27 (a) If the Executive Director determines it is appropriate, he or she may set an
28 application for consideration at a GCA hearing in advance of a meeting pursuant to
Section 12054. The Executive Director will give notice to the applicant, pursuant to
paragraph (2) subsection (c) of Section 12052, to the Office of the Attorney General,
and to the Bureau no later than 90 calendar days in advance of the GCA hearing. The
Executive Director's determination will be based on information contained in the
Bureau's report or other appropriate sources including, without limitation, a request
from the Bureau or applicant as well as the Commission's operational considerations.

(b) When a GCA hearing is elected pursuant to Section 12056, subsection (a),
the Executive Director will give notice to the applicant, pursuant to paragraph (2)
subsection (c) of Section 12052, to the Office of the Attorney General, and to the
Bureau no later than 60 calendar days in advance of the GCA hearing.

1 (c) An applicant may request that his, her, or its GCA hearing be held at a
2 Southern California location instead of the Commission's principal office in
3 Sacramento, by completing the appropriate section on the Notice of Defense, CGCC-
4 CH1-03 (Rev. 08/21). The request must be made on the initial Notice of Defense
5 form submitted to the Commission and Bureau within the timeframes specified on the
6 form.

7 (1) The Executive Director will approve a Southern California GCA hearing, if the
8 request is timely made on the initial Notice of Defense form and meets all of the
9 following criteria:

10 (A) The GCA hearing is estimated by Commission staff to last no longer than
11 four hours.

12 (B) The primary residence of the applicant is located in one of the following
13 counties: Imperial, Kern, Los Angeles, Orange, Riverside, San Diego, San Luis
14 Obispo, San Bernardino, Santa Barbara, or Ventura.

15 (C) A GCA hearing will be noticed for a Southern California location only
16 when it is in the best public interest, promotes judicial economy, and comports with
17 the Commission's availability.

18 (2) If at any time before the hearing, the Executive Director determines that the
19 criteria in subparagraphs (A) through (C) of paragraph (1) are no longer met,
20 Commission staff may cancel the Southern California GCA hearing and issue a new
21 notice for a hearing at the Commission's principal office in Sacramento.

22 (d) The presiding officer and her or his support staff will have no
23 communication with the Commission or Commission staff upon the merits of an
24 application prior to the evidentiary hearing. The Executive Director will designate a
25 presiding officer which will be:

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

27 (2) An Administrative Law Judge.

28 (e) 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. For a Southern California GCA hearing, if a
continuance is granted, the hearing may be scheduled in Sacramento or Southern
California based on the criteria specified in subparagraphs (A) through (C) of
paragraph (1) of subsection (c).

(f) The complainant will provide to the applicant, subject to subsection (b) of
Section 12056, at least 45 calendar days prior to the GCA hearing, and the applicant
must provide to the complainant, at least 30 calendar days prior to the GCA hearing,
the following items:

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

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

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

2 (4) All other written comments, writings, or other items containing relevant
evidence.

3 (g) The provisions of subsection (f) of this section provide the exclusive right to
4 and method of discovery between the applicant and complainant to a GCA hearing.
5 Discovery is not permitted upon a Commission member or an advisor of the
6 Commission unless a showing is made that they have direct personal factual
information pertaining to material issues related to the application at issue and the
information to be gained from the Commission member or advisor of the Commission
is not available through any other sources.

7 (h) A presiding officer will rule on the admissibility of evidence and on any
8 objections raised except for objections raised under subsection (h). A ruling by the
presiding officer is final.

9 (1) In advance of the GCA hearing, upon a motion of a party or by order of the
10 presiding officer, the presiding officer may conduct a pre-hearing conference, either
11 in person, via teleconference, or by email exchange, subject to the presiding officer's
availability and will issue a pre-hearing order if appropriate or requested by either
party. The pre-hearing conference and order may address the following:

12 (A) Evidentiary issues;

13 (B) Witness and exhibit lists;

14 (C) Alterations in the Bureau recommendation;

15 (D) Stipulations for undisputed facts and/or the admission of evidence
16 including without limitation the Bureau's report;

17 (E) Authorizing offsite livestreaming appearances for parties or witnesses if
18 good cause has been presented and only if the process for offsite livestreaming has
been approved by the Executive Director; and,

19 (F) Other issues that may be deemed appropriate to promote the orderly and
prompt conduct of the hearing.

20 (2) The GCA hearing need not be conducted according to technical rules of
21 evidence. Any relevant evidence may be considered, and is sufficient in itself to
22 support findings if it is the sort of evidence on which reasonable persons are
23 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.

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

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

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

28 (j) The complainant will present all facts and information in the Bureau report,
if any, and the results of the Bureau's background investigation, and the basis for any

1 recommendation, if the Bureau filed one with the Commission according to Business
2 and Professions Code section 19868, to enable the Commission to make an informed
3 decision on whether the applicant has met his, her, or its burden of proof. The
4 complainant may but is not required to recommend or seek any particular outcome
5 during the evidentiary hearing, unless it so chooses.

6 (k) The burden of proof is always on the applicant to prove his, her, or its
7 qualifications to receive any license or other approval under the Act.

8 (l) The applicant may choose to represent himself, herself, or itself, or may
9 retain an attorney or lay representative. Lay representatives may assist the applicant
10 but are not authorized to serve as an attorney as otherwise defined and regulated by
11 state law.

12 (m) Except as otherwise provided in subsection (i), the complainant and
13 applicant will have the right to call and examine witnesses under oath; to introduce
14 relevant exhibits and documentary evidence; to cross-examine opposing witnesses on
15 any relevant matter, even if the matter was not covered in direct examination; to
16 impeach any witness, regardless of which party first called the witness to testify; and
17 to offer rebuttal evidence. If the applicant does not testify on his, her or its behalf, the
18 applicant may be called and examined, under oath, as if under cross-examination.

19 (n) Oral evidence will be taken upon oath or affirmation, which may be
20 administered by the Executive Director, a member of the Commission, or the
21 presiding officer if an Administrative Law Judge.

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