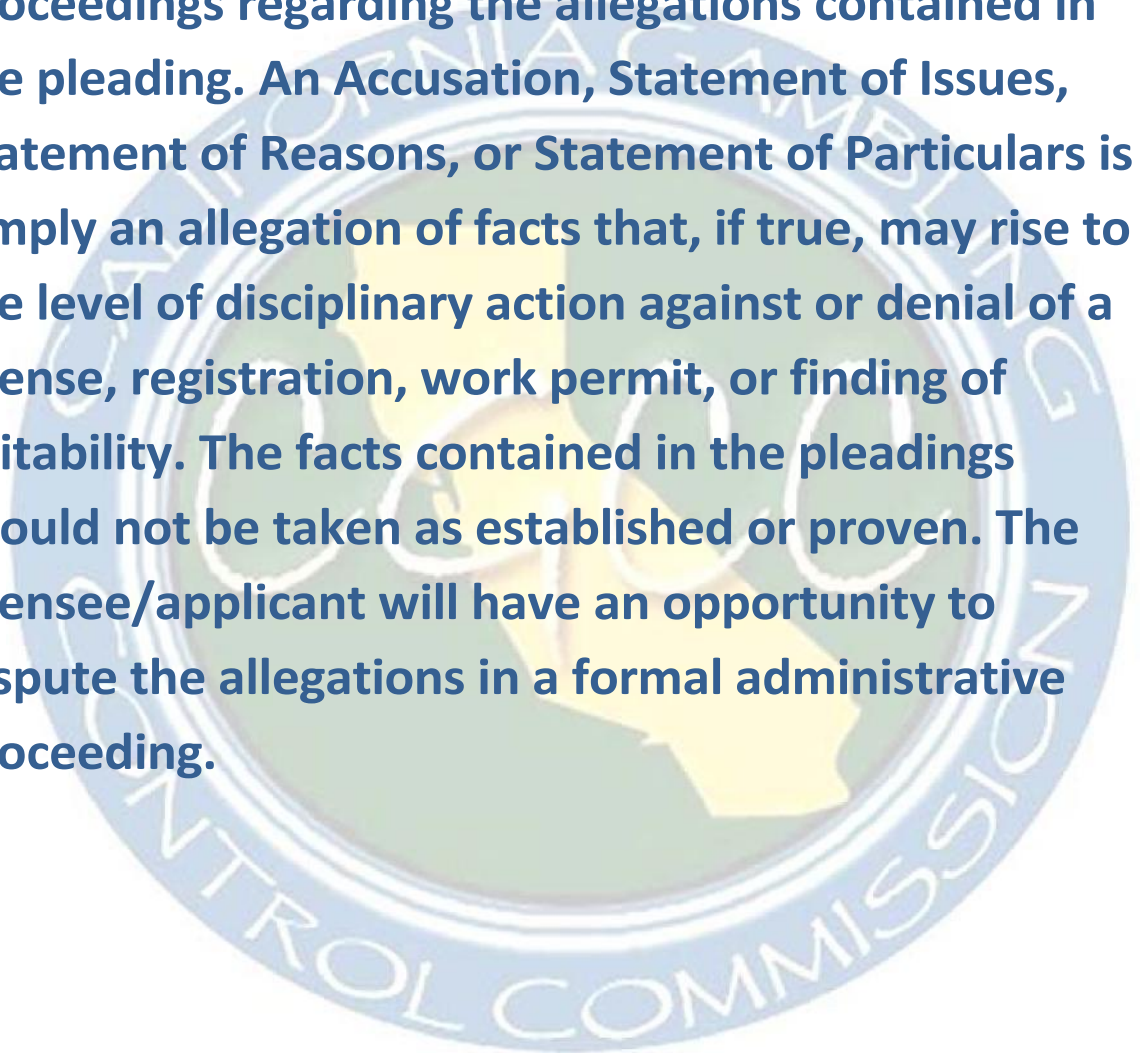


The Commission is providing a copy of this pleading (Accusation, or Statement of Reasons, Statement of Particulars, or Statement of Issues) so the public is as informed as possible of pending administrative proceedings regarding the allegations contained in the pleading. An Accusation, Statement of Issues, 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
 9 **BEFORE THE**
CALIFORNIA GAMBLING CONTROL COMMISSION
 10 **STATE OF CALIFORNIA**

11
 12 In the Matter of the Accusation Against:

BGC Case No. BGC-HQ2026-00001AC

13 **MARK ANTHONY CASTRO**

ACCUSATION

14 
 15 **Third Party Worker Regular License**
No. TPWK-004226,

16 Respondent.
 17

18
 19 **PARTIES**

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

22 2. On September 22, 2022, the California Gambling Control Commission (Commission)
 23 issued Third Party Worker Regular License Number TPWK-004226 to Mark Anthony Castro
 24 (Respondent). The Third Party Worker Regular License has been active at all times relevant to
 25 the allegations in this Accusation and is scheduled to expire on September 30, 2026, unless
 26 renewed.

27 ///

28 ///

1 **RESPONDENT’S DESIGNATED AGENT**

2 3. On or about October 1, 2025, Respondent designated Fabiana Arellano as his
3 Designated Agent on file with the Bureau. Fabiana Arellano’s address is 8141 E. Kaiser Blvd.,
4 Ste. 213, Anaheim, CA 92808.

5 **JURISDICTION**

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

9 5. The Commission has jurisdiction over the operation and concentration of gambling
10 establishments and all persons and things having to do with operation of gambling
11 establishments. (Code, § 19811, subd. (b); § 19984.)¹ The Commission has all powers necessary
12 and proper to fully and effectually carry out the policies and procedures of the Gambling Control
13 Act (Code, § 19800, et seq.). (Code, § 19824.) The Commission’s responsibilities include
14 assuring that no unqualified person, or any person “whose operations are conducted in a manner
15 that is inimical to the public health, safety, and welfare” has any direct or indirect material
16 involvement with a licensed gambling operation. (Code, § 19823, subd. (a)(2).)

17 6. The Gambling Control Act (Act) is an exercise of the police power of the state
18 intended to protect the public’s health, safety and general welfare. The Act is to be liberally
19 interpreted to effectuate that purpose. (Code, § 19971.)

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

25 8. Upon the Bureau filing an accusation, the Commission proceeds under Government
26 Code section 11500 et seq. (Code, § 19930, subd. (b); see Cal. Code Regs., tit. 4, § 12554(a).)

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

1 The Commission's disciplinary powers include, among other things, license revocation, license
2 suspension, imposing a condition on a license, and requiring payment of a fine or monetary
3 penalty. (Code, § 19930, subd. (c); Cal. Code Regs., tit. 4, § 12554(d).)

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

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

8 **FACTS**

9 11. In April 2025, Respondent was working as a third-party proposition player for
10 Global Player Services, Inc., at Bankers Casino in Salinas, California. Respondent's job duties
11 consisted of overseeing poker games and upholding the integrity of the games. J. P., an employee
12 of Global Player Services, reviewed surveillance footage on April 4, 2025, which showed
13 Respondent stealing poker chips from his assigned poker table. The total value of the chips was
14 \$7,300.00. Surveillance footage on April 11, 2025, showed Respondent removing chips from his
15 assigned poker table several times and placing them into his pockets. The total value of the chips
16 was \$5,400.00.

17 12. J. P. met with Respondent, who related that E. S., an employee of Bankers Casino,
18 facilitated the embezzlement. Respondent agreed to participate because he was going through
19 financial difficulty. Respondent wrote an apology letter and admitted to stealing the chips in
20 exchange for money. J. P. reported the embezzlement to the Salinas Police Department on April
21 14, 2025. Further investigation by Global Player Services determined that Respondent and E. S.
22 embezzled a total of \$75,200.00. The Salinas Police Department unsuccessfully attempted to
23 contact Respondent at this residence.

24 13. Global Players Services submitted a Notification of Employee Separation (CGCC-
25 CH2-03) on or about April 15, 2025, notifying the Bureau that Respondent was terminated from
26 his employment on April 14, 2025.

27 ///

28 ///

1 prohibited by the Gambling Control Act when he stole approximately \$75,200.00 worth of poker
2 chips while working for Global Player Services at Bankers Casino. Complainant refers to and by
3 this reference incorporates the allegations in paragraphs 11 through 13.

4 **FOURTH CAUSE FOR DISCIPLINE**

5 **(No Longer Meets Criterion for Eligibility)**


6 19. Respondent is subject to disciplinary action pursuant to sections 19824,
7 subdivision (b), and 19930, in connection with California Code of Regulations, title 4, section
8 12560(e)(2). Respondent no longer meets the criterion for eligibility, pursuant to section 12040
9 after he stole approximately \$75,200.00 worth of poker chips while working for Global Player
10 Services at Bankers Casino. Complainant refers to and by this reference incorporates the
11 allegations in paragraphs 11 through 13.

12 **PRAYER**

13 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
14 Accusation, and that following the hearing, the Commission issue a decision:

- 15 1. Disciplining Third Party Worker Regular License Number TPWK-004226 issued to
16 Mark Anthony Castro;
- 17 2. Ordering Mark Anthony Castro to pay the California Department of Justice, Bureau
18 of Gambling Control, the reasonable costs of the investigation and enforcement of this case,
19 pursuant to Business and Professions Code section 19930, subdivision (d)(1);
- 20 3. Imposing fines or monetary penalties against Mark Anthony Castro, according to
21 proof and to the maximum extent allowed by law; and
- 22 4. Taking such other and further action as deemed necessary and proper.

23
24
25 DATED: 04/28/2026



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

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68300820

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APPENDIX A
STATUTORY AND REGULATORY PROVISIONS
BUSINESS AND PROFESSIONS CODE

1. Business and Professions Code section 19801 provides, in pertinent part:

....

(k) In order to effectuate state policy as declared herein, it is necessary that gambling establishments, activities, and equipment be licensed, that persons participating in those activities be licensed or registered, that certain transactions, events, and processes involving gambling establishments and owners of gambling establishments be subject to prior approval or permission, that unsuitable persons not be permitted to associate with gambling activities or gambling establishments, and that gambling activities take place only in suitable locations. Any license or permit issued, or other approval granted pursuant to this chapter, is declared to be a revocable privilege, and no holder acquires any vested right therein or thereunder.

....

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 operations 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.

(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.

///

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

2 The commission shall have all powers necessary and proper to enable it fully
3 and effectually to carry out the policies and purposes of this chapter,² including,
4 without limitation, the power to do all of the following:

5

6 (b) For any cause deemed reasonable by the commission, deny any application
7 for a license, permit, or approval provided for in this chapter or regulations adopted
8 pursuant to this chapter, limit, condition, or restrict any license, permit, or approval,
9 or impose any fine upon any person licensed or approved. The commission may
10 condition, restrict, discipline, or take action against the license of an individual owner
11 endorsed on the license certificate of the gambling enterprise whether or not the
12 commission takes action against the license of the gambling enterprise.

13

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

17

18 5. Business and Professions Code section 19825 provides:

19 The commission may require that any matter of an adjudicative nature
20 regarding a license, permit, or finding of suitability, that the commission is authorized
21 or required to consider in an evidentiary hearing, including a hearing held pursuant to
22 Section 19870, be heard and determined in accordance with Chapter 5 (commencing
23 with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

24 6. Business and Professions Code section 19826 provides, in part:

25 The department³ shall perform all investigatory functions required by this
26 chapter, as well as auditing functions under tribal gaming compacts, and shall have all
27 of the following responsibilities:

28

29 (b) To monitor the conduct of all licensees and other persons having a material
30 involvement, directly or indirectly, with a gambling operation or its holding company,
31 for the purpose of ensuring that licenses are not issued or held by, and that there is no
32 direct or indirect material involvement with, a gambling operation or holding
33 company by ineligible, unqualified, disqualified, or unsuitable persons, or persons
34 whose operations are conducted in a manner that is inimical to the public health,
35 safety, or welfare.

36 (c) To investigate suspected violations of this chapter or laws of this state
37 relating to gambling, including any activity prohibited by Chapter 9 (commencing
38 with Section 319) or Chapter 10 (commencing with Section 330) of Title 9 of Part 1

² “Chapter” refers to Business and Professions Code, division 8, chapter 5, (commencing with section 19800), also known as the Gambling Control Act.

³ “Department” refers to the Department of Justice. (Code, § 19805, subd. (h).)

1 of the Penal Code.

2

3 (e) To initiate, where appropriate, disciplinary actions as provided in this
4 chapter. In connection with any disciplinary action, the department may seek
5 restriction, limitation, suspension, or revocation of any license or approval, or the
6 imposition of any fine upon any person licensed or approved.

7 (f) To adopt regulations reasonably related to its functions and duties as
8 specified in this chapter.

9

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

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

19 8. Business and Professions Code section 19857 provides:

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

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

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

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

9. Business and Professions Code section 19984 provides, in part:

Notwithstanding any other law, a licensed gambling enterprise may contract
with a third party for the purpose of providing proposition player services at a
gambling establishment, subject to the following conditions:

. . . .

(b) (1) The commission shall establish reasonable criteria for, and require the
licensure and registration of, any person or entity that provides proposition player
services at gambling establishments pursuant to this section, including owners,

1 supervisors, and players. The commission may impose licensing requirements,
2 disclosures, approvals, conditions, or limitations as it deems necessary to protect the
3 integrity of controlled gambling in this state, and may assess, and the department may
4 collect, reasonable fees and deposits as necessary to defray the costs of providing this
5 regulation and oversight.

6

7 10. Business and Professions Code section 19910 provides:

8 The Legislature finds that to protect and promote the health, safety, good order,
9 and general welfare of the inhabitants of this state, and to carry out the policy
10 declared by this chapter, it is necessary that the department ascertain and keep itself
11 informed of the identity, prior activities, and present location of all gambling
12 enterprise employees and independent agents in the State of California, and when
13 appropriate to do so, recommend to the commission for approval persons for
14 employment in gambling establishments as provided in this article.

15 11. Business and Professions Code section 19930 provides, in pertinent part:

16

17 (b) If, after any investigation, the department is satisfied that a license, permit,
18 finding of suitability, or approval should be suspended or revoked, it shall file an
19 accusation with the commission in accordance with Chapter 5 (commencing with
20 Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

21 (c) In addition to any action that the commission may take against a license,
22 permit, finding of suitability, or approval, the commission may also require the
23 payment of fines or penalties. However, no fine imposed shall exceed twenty
24 thousand dollars (\$20,000) for each separate violation of any provision of this chapter
25 or any regulation adopted thereunder.

26 (d) In any case in which the administrative law judge recommends that the
27 commission revoke, suspend, or deny a license, the administrative law judge may,
28 upon presentation of suitable proof, order the licensee or applicant for a license to pay
the department the reasonable costs of the investigation and prosecution of the case.

(1) The costs assessed pursuant to this subdivision shall be fixed by the
administrative law judge and may not be increased by the commission. When
the commission does not adopt a proposed decision and remands the case to the
administrative law judge, the administrative law judge may not increase the
amount of any costs assessed in the proposed decision.

(2) The department may enforce the order for payment in the superior
court in the county in which the administrative hearing was held. The right of
enforcement shall be in addition to any other rights that the department may
have as to any licensee directed to pay costs.

(3) In any judicial action for the recovery of costs, proof of the
commission's decision shall be conclusive proof of the validity of the order of
payment and the terms for payment.

. . . .

1 (f) For purposes of this section, “costs” include costs incurred for any of the
2 following:

3 (1) The investigation of the case by the department.

4 (2) The preparation and prosecution of the case by the Office of the
5 Attorney General.

6 12. Business and Professions Code section 19943 provides, in pertinent part:

7

8 (b) Any person or business described in subdivision (a), with actual knowledge
9 of the requirements of regulations adopted by the commission pursuant to subdivision
10 (d) of Section 19841, that knowingly and willfully fails to comply with the
11 requirements of those regulations shall be liable for a monetary penalty. The
12 commission may impose a monetary penalty for each violation. However, in the first
13 proceeding that is initiated pursuant to this subdivision, the penalties for all violations
14 shall not exceed a total sum of ten thousand dollars (\$10,000). If a penalty was
15 imposed in a prior proceeding before the commission, the penalties for all violations
16 shall not exceed a total sum of twenty-five thousand dollars (\$25,000). If a penalty
17 was imposed in two or more prior proceedings before the commission, the penalties
18 for all violations shall not exceed a total sum of one hundred thousand dollars
19 (\$100,000).

20

21 13. Business and Professions Code section 19971 provides, in pertinent part:

22 This act is an exercise of the police power of the state for the protection of the
23 health, safety, and welfare of the people of the State of California, and shall be
24 liberally construed to effectuate those purposes.

25 **CALIFORNIA CODE OF REGULATIONS**

26 14. California Code of Regulations, title 4, section 12002 provides, in part:

27 Unless otherwise specified, the definitions in Business and Professions Code
28 section 19805, supplemented by the definitions found in Chapter 10 of Title 9 of Part
1 of the Penal Code (commencing with section 330), govern the construction of this
2 division. As used in this division:

3

4 (d) “Authorized player” means any natural person associated with a particular
5 TPPPS business license, including a subcontractor or independent contractor, whose
6 duties include the play in a controlled game on behalf of the TPPPS business license.
7 All TPPPS supervisor licensees must be authorized players. A TPPPS worker licensee
8 may be an authorized player. A TPPPS owner type licensee, if a natural person, may
9 be an authorized player.

10

1 (al) "Registrant" means a person having a valid registration issued by the
2 Commission.

3

4 (ao) "Temporary license" means a preliminary license or Commission work
5 permit issued to an applicant prior to action on an initial license application, with
6 appropriate conditions, limitations or restrictions determined on a case-by-case basis
7 and, for the purposes of this division also includes:

8 (1) The following licenses:

9

10 (H) Temporary TPPPS worker license.

11

12 (ay) "TPPPS worker license" means a license issued to any natural person
13 employed or hired by a TPPPS business licensee, including a subcontractor or
14 independent contractor, whose duties include being at a gambling establishment, but
15 who does not have any supervisory responsibilities identified in a job duty statement
16 or otherwise empowered to make discretionary decisions that regulate TPPPS
17 operations, including, without limitation, the authority to, on behalf of the TPPPS
18 business licensee, to authorize or approve the distribution of currency, chips, or other
19 wagering instruments to players engaged in the provision of third-party proposition
20 player services in a gambling establishment.

21 15. California Code of Regulations, title 4, section 12550 provides, in part:

22 (a) The purpose of this chapter is to set forth disciplinary procedures and
23 guidelines applicable to the holder of any license, registration, permit, finding of
24 suitability, or approval issued by the Commission. This chapter does not apply to any
25 denial proceedings under the Act.

26 (b) The disciplinary guidelines in this chapter are designed to promote fairness
27 and flexibility in dealing with a wide range of disciplinary scenarios. Variation in
28 penalties based on circumstances and factors in aggravation or mitigation are part of
this disciplinary scheme to promote compliance with applicable laws and regulations.

29

30 16. California Code of Regulations, title 4, section 12554 provides, in part:

31 (a) Upon the filing with the Commission of an accusation by the Bureau
32 recommending revocation, suspension, or other discipline of a holder of a license,
33 registration, permit, finding of suitability, or approval, the Commission will proceed
34 under Chapter 5 (commencing with section 11500) of Part 1 of Division 3 of Title 2
35 of the Government Code.

36

37 (c) The Administrative Law Judge and Commission will base their decisions on
38 written findings of fact, including findings concerning any relevant aggravating or
mitigating factors. Findings of fact will be based upon a preponderance of the

1 evidence standard. The “preponderance of the evidence standard” is such evidence as
2 when considered and compared with that opposed to it, has more convincing force,
3 and produces a belief in the mind of the fact-finder that what is sought to be proved is
4 more likely true than not true.

5 (d) Upon a finding of a violation of the Act, any regulations adopted pursuant
6 thereto, any law related to gambling or gambling establishments, violation of a
7 previously imposed disciplinary or license condition, or laws whose violation is
8 materially related to suitability for a license, registration, permit, or approval, the
9 Commission may do any one or more of the following:

10 (1) Revoke the license, registration, permit, finding of suitability, or
11 approval;

12 (2) Suspend the license, registration, or permit;

13 (3) Order the licensing authority of a city, county, or city and county, to
14 revoke a local work permit, pursuant to Business and Professions Code section
15 19914, subdivision (a),

16 (4) Impose any condition, limitation, order, or directive (including but not
17 limited to a directive to divest an interest in a business entity pursuant to
18 Business and Professions Code, section 19879);

19 (5) Impose any fine or monetary penalty consistent with Business and
20 Professions Code sections 19930, subdivision (c), and 19943, subdivision (b);

21 (6) Stay, in whole or in part, the imposition of a revocation or suspension
22 against the holder of a license, registration, work permit, finding of suitability,
23 or approval, or

24 (7) Order the holder to pay a monetary penalty in lieu of all or a portion
25 of a suspension. Within the guidelines of Business and Professions Code
26 sections 19930, subdivision (c), and 19943, subdivision (b):

27

28 (E) If the respondent is a holder of a work permit or TPPPS worker
license, or a person not otherwise described above, the monetary penalty
will be \$50 per day for the number of calendar-days for which the
suspension is stayed.

. . . .

(i) Any order to pay the costs of investigation or prosecution of the case shall be
fixed pursuant to Business and Professions Code section 19930, subdivision (d).

(j) For multiple violations, or for suspensions imposed by other jurisdictions
based on the same violations, the decision must state whether any Commission-
imposed suspensions must run consecutively or concurrently.

(k) Where a violation arises from a practice that is repeated many times an hour
or day in the conduct of controlled games, each instance of the practice will not be

1 charged as a separate violation; however, the frequency and duration of the practice
2 will be treated as aggravating or mitigating factors.

3 17. California Code of Regulations, title 4, section 12560 provides, in pertinent part:

4

5 (c) A TPPPS employee type licensee will be subject to a minimum monetary
6 penalty of \$100 and/or a suspension of three calendar-days and a maximum penalty
7 of revocation if the Commission finds that:

8 (1) The TPPPS employee type licensee has violated or is out of
9 compliance with conditions, limitations, orders, or directives imposed
10 by the Commission, either as part of an initial license, renewal
11 licensee, or pursuant to disciplinary action;

12 (2) The TPPPS employee type licensee has engaged in any
13 dishonest, fraudulent, or deceptive activities in connection with
14 controlled gambling or the provision of proposition player services;

15 (3) The TPPPS employee type licensee has committed any act
16 punishable as a crime, not otherwise listed in these disciplinary
17 guidelines, which substantially relates to the duties and qualifications
18 of the licensee, or which occurred in a gambling establishment or the
19 associated adjacent property;

20 (4) The TPPPS employee type licensee has engaged in any
21 conduct on the premises of the gambling establishment or in
22 connection with controlled gambling or the provision of proposition
23 player services which is inimical to the health, welfare, or safety of the
24 general public;

25 (5) The TPPPS employee type licensee has either failed to wear
26 a badge, worn a badge which was covered, worn a false or altered
27 badge, worn another person's badge, or worn an expired badge;

28 (6) The TPPPS employee type licensee has engaged in fighting
or has intentionally provoked a patron or employee of a cardroom
business licensee;

(7) The TPPPS employee type licensee has maliciously or
willfully destroyed or damaged the property of a cardroom business
licensee, cardroom employee type licensee, or patron;

(8) The TPPPS employee type licensee has accepted tips,
gratuities, complimentaries, or gifts from a cardroom category licensee
or cardroom businesses licensee's patrons;

(9) The TPPPS employee committed, attempted to commit, or
conspired to commit any act prohibited by the Act or this chapter; or,

(10) The TPPPS employee type licensee has failed to comply
with California Code of Regulations, Title 4, Section 12290.

1 (d) A TPPPS employee type licensee will be subject to a minimum monetary
2 penalty of \$300 and/or a suspension of five calendar-days and a maximum penalty of
3 revocation if the Commission finds that:

4 (1) The TPPPS employee type licensee has intentionally misrepresented a
5 material fact on an application, or supplemental application for licensure or
6 approval;

7 (2) The TPPPS employee type licensee has been cheating, pursuant to
8 Penal Code, section 337x;

9 (3) The TPPPS employee type licensee has committed extortion (as that
10 term is defined in Chapter 7 of Title 13 of Part 1 of the Penal Code,
11 commencing with section 518);

12 (4) The TPPPS employee type licensee has committed loan-sharking (as
13 that term is used in Civil Code section 1916-3, subdivision (b));

14 (5) The TPPPS employee type licensee has conducted or negotiated
15 illegal sales of controlled substances (as that term is used in Chapter 1
16 (commencing with section 11000) of Division 10 of the Health and Safety
17 Code) or dangerous drugs (as that term is used in Business and Professions
18 Code, section 4022);

19 (6) The TPPPS employee type licensee has committed bribery (as that
20 term is used in Penal Code section 67 or 67.5);

21 (7) The TPPPS employee type licensee has committed money laundering
22 (as that term is used in Chapter 10 of Title 7 of Part 1 of the Penal Code,
23 commencing with section 186.9);

24 (8) The TPPPS employee type licensee has granted rebates to patrons
25 without full disclosure, in violation of California Code of Regulations, Title 4,
26 Section 12270, subsection (b)(18);

27 (9) The TPPPS employee type licensee intentionally misrepresented a
28 material fact on an application or supplemental application for licensure

(10) The TPPPS employee type licensee engaged in any dishonest,
fraudulent, or unfairly deceptive activity in connection with controlled
gambling, including any violation of laws related to cheating;

(11) The TPPPS employee type licensee concealed or refused to disclose
any material fact in any inquiry by the Bureau or the Commission;

(12) The TPPPS employee type licensee committed, attempted to commit,
or conspired to commit an act of embezzlement or larceny;

(13) The TPPPS employee type licensee has been lawfully excluded from
being present upon the premises of any licensed gambling establishment for any
reason relating to cheating or any violation of the Act;

(14) The TPPPS employee type licensee bought or sold chips other than
to or from the house, except for exchanging with a patron, chips of one
denomination for chips of another denomination;

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(15) The TPPPS employee type licensee lent money or chips to a gambling enterprise patron; or,

(16) The TPPPS employee type licensee made a wager that was not specifically authorized by the game rules as approved by the Bureau.

(e) A TPPPS category licensee will be subject to revocation if the Commission finds that:

....

(2) The TPPPS employee type licensee no longer meets any criterion for eligibility, pursuant to Section 12040.