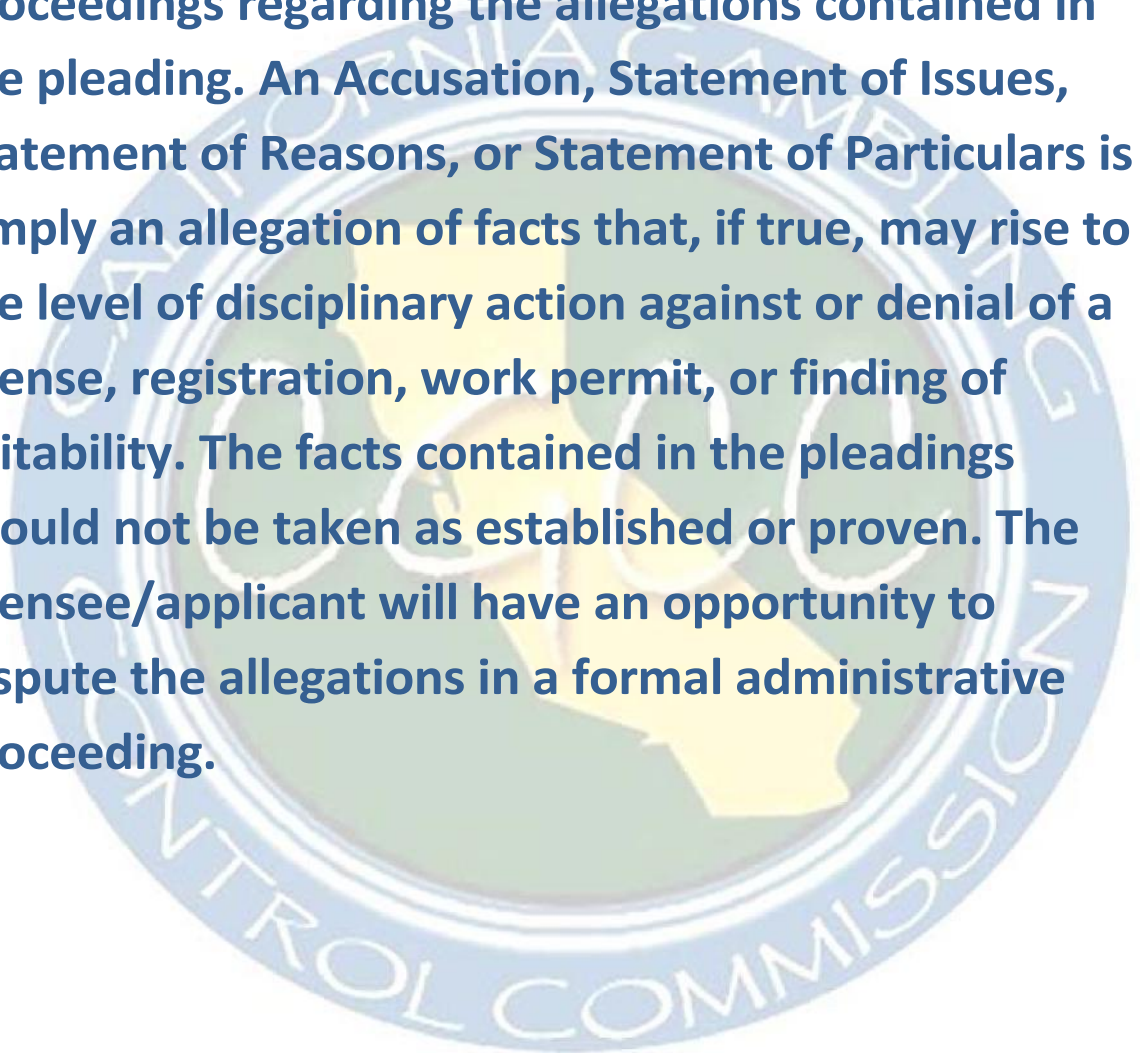


The Commission is providing a copy of this pleading (Accusation, or Statement of Reasons, Statement of Particulars, or Statement of Issues) so the public is as informed as possible of pending administrative proceedings regarding the allegations contained in the pleading. An Accusation, Statement of Issues,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

In the Matter of the Application for a Finding of Suitability for:
GEORGE MIGUEL LINTAG
TRKE-025468
Respondent.

Case Nos.: CGCC-2025-0522-8A
BGC-HQ2025-00013AL
STATEMENT OF REASONS
Hearing Date: May 15, 2026
Hearing Time: 10:00 a.m.
Hearing Place: 2399 Gateway Oaks, Ste. 100
Sacramento, CA 95833
This hearing will be conducted by means of video conferencing on Zoom. The Zoom meeting code is 285 757 8614.

Complainant alleges as follows:

PARTIES

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

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APPENDIX A

BUSINESS AND PROFESSIONS CODE

1. 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.

2. 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 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.

3. 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,^[3] 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

³ “Chapter” refers to Business and Professions Code, division 8, chapter 5, (commencing with section 19800), also known as the Gambling Control Act.

1 condition, restrict, discipline, or take action against the license of an
2 individual owner endorsed on the license certificate of the gambling
3 enterprise whether or not the commission takes action against the
4 license of the gambling enterprise.

5 * * *

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

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

10 (a) A person shall not be employed as a key employee unless that
11 person applies for and obtains a key employee license.

12 (b) A person shall not be issued a key employee license unless the
13 person would qualify for a state gambling license.

14 5. Business and Professions Code section 19856 provides:

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

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

25 (c) In reviewing an application for any license, the commission
26 shall consider whether issuance of the license is inimical to public
27 health, safety, or welfare, and whether issuance of the license will
28 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.

6. 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 7. 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 as to a material fact pertaining to the qualification criteria.

15 * * *

16 (d) Conviction of the applicant for any misdemeanor involving
17 moral turpitude within the 10-year period immediately preceding the
18 submission of the application, unless the applicant has been granted
19 relief pursuant to Section 1203.4 of the Penal Code, provided,
20 however, that the granting of relief pursuant to Section 1204.4 of
21 the Penal Code shall not constitute a limitation on the discretion of the
22 commission under Section 19856 or effect the applicant's burden
23 under Section 19857.

24 8. Business and Professions Code section 19866 provides:

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

9. Business and Professions Code section 19870 provides:

(a) The commission, after considering the recommendation of the
chief^{4]} and any other testimony and written comments as may be
presented at the meeting, or as may have been submitted in writing to
the commission prior to the meeting, may either deny the application
or grant a license to an applicant who it determines to be qualified to
hold the license, or refer the application to an evidentiary hearing.

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

⁴ "Chief" refers to the Director of the Bureau. (Bus. & Prof. Code, § 19805, subd. (d).)

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

12 (d) When an application is denied after an evidentiary hearing,
13 the commission shall prepare and file a detailed statement of its
14 reasons for the denial.

15 (e) All proceedings relating to an application at a meeting of the
16 commission or at an evidentiary hearing shall be recorded
17 stenographically or by audio or video recording.

18 (f) A decision of the commission after an evidentiary hearing,
19 denying a license or approval, or imposing any condition or restriction
20 on the grant of a license or approval may be reviewed by petition
21 pursuant to Section 1085 of the Code of Civil Procedure. Section
22 1094.5 of the Code of Civil Procedure does not apply to any judicial
23 proceeding held to consider that petition, and the court may grant the
24 petition only if the court finds that the action of the commission was
25 arbitrary and capricious, or that the action exceeded the commission's
26 jurisdiction.

27 10. Business and Professions Code section 19871 provides:

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

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

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

(A) To call and examine witnesses.

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

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

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

(E) To offer rebuttal evidence.

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

3 (4) The meeting need not be conducted according to
4 technical rules relating to evidence and witnesses. Any relevant
5 evidence may be considered, and is sufficient in itself to support a
6 finding, if it is the sort of evidence on which responsible persons
7 are 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.

8 (b) Nothing in this section confers upon an applicant a right to
9 discovery of the department's^[5] investigative reports or to require
disclosure of any document or information the disclosure of which is
otherwise prohibited by any other provision of this chapter.

10 **TRIBAL-STATE COMPACT BETWEEN THE STATE OF CALIFORNIA**
11 **AND THE YOCHA DEHE WINTUN NATION**

12
13 11. The Tribal-State Compact Between the State of California and the Yocha Dehe
14 Wintun Nation section 6.4.3 subdivision (a) (Gaming Employees) and section 6.5.6 subdivisions
15 (c), (e), (f), and (g) (State Determination of Suitability Process) provide, in part:

16 Every Gaming Employee shall obtain, and thereafter maintain
17 current, a valid tribal gaming license, and except as provided in
18 subdivision (b), shall obtain, and thereafter maintain current, a State
Gaming Agency determination of suitability, which license and
determination shall be subject to biennial renewal[.]

19

20 Investigation and disposition of applications for a determination
21 of suitability shall be governed entirely by State law, and the State
22 Gaming Agency shall determine whether the Applicant would be
23 found suitable for licensure in a gambling establishment subject to the
State Gaming Agency's jurisdiction. Additional information may be
required by the State Gaming Agency to assist it in its background
investigation, to the extent permitted under State law for licensure in a
gambling establishment subject to the State Gaming Agency's
jurisdiction.

24

25 . . . If further investigation is required to supplement the
26 investigation conducted by the Tribal Gaming Agency, the Applicant
27 will be required to pay the application fee charged by the State
Gaming Agency pursuant to California Business and Professions Code
section 19951, subdivision (a) Failure to provide information
reasonably required by the State Gaming Agency to complete its

28 ⁵ "Department" refers to the Department of Justice. (Bus. & Prof. Code, § 19805, subd.
(h).)

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investigation under State law or failure to pay the application fee or deposit can constitute grounds for denial of the application by the State Gaming Agency. . . .

Upon completion of the necessary background investigation or other verification of suitability, the State Gaming Agency shall issue a notice to the Tribal Gaming Agency certifying that the State has determined that the Applicant is suitable, or that the Applicant is unsuitable, for licensure in a Gaming Operation and, if unsuitable, stating the reasons therefore. . . .

Prior to denying an application for a determination of suitability, or to issuing notice to the Tribal Gaming Agency that a person or entity previously determine to be suitable had been determined unsuitable for licensure, the State Gaming Agency shall notify the Tribal Gaming Agency and afford the Tribe an opportunity to be heard. If the State Gaming Agency denies an application for a determination of suitability, or issues notice that a person or entity previously determined suitable has been determined unsuitable for licensure, the State Gaming Agency shall provide that person or entity with written notice of all appeal rights available under state law.

(Tribal-State Compact Between the State of California and the Yocha Dehe Wintun Nation, executed August 4, 2016, pp. 31, 47-49.)