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8

9 **BEFORE THE**  
10 **CALIFORNIA GAMBLING CONTROL COMMISSION**  
11 **STATE OF CALIFORNIA**  
12

13  
14 **In the Matter of the Accusation Against:**

15 **ROBERT E. LYTLE**

16 **9360 Blue Oak Drive**  
17 **Orangevale, CA 95662**

18 **LICENSE NUMBERS:**

19 **GEKE-001373**  
20 **GEOW-003415**  
21 **GEOW-003416**

**BGC Case No. HQ2014-00005AL**

**OAH No.**

**ACCUSATION**

22 Complainant alleges as follows:

23 **PARTIES**

24 1. Wayne J. Quint, Jr. (Complainant) brings this Accusation solely in his official  
25 capacity as the Chief of the California Department of Justice, Bureau of Gambling Control  
26 (Bureau).  
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1           5. Respondent's acts and omissions, including without limitation those alleged in this  
2 Accusation, show that for personal gain and the gain of those whom he came to represent, he  
3 abandoned the basic principles of the state agency, and the general public, that he served. Many  
4 of those acts and omissions were in derogation of the State's conflict of interest and revolving  
5 door provisions. Respondent's acts and omissions, including without limitation those alleged in  
6 this Accusation, were inimical to public health, safety, and welfare and demonstrate that  
7 Respondent is not a person of good character, honesty, and integrity. His acts and omissions,  
8 including those alleged in this Accusation, pose a threat to the effective regulation and control  
9 of controlled gambling, and create or enhance the dangers of unsuitable, unfair, or illegal  
10 practices, methods, and activities in carrying on the business and financial arrangements  
11 incidental to the conduct of controlled gambling. Respondent is not suitable or qualified for  
12 continued licensure; therefore, each of his licenses should be disciplined.

13                                   **FACTS UNDERLYING CAUSES FOR DISCIPLINE**

14           6. Complainant is informed and believes and, therefore, alleges that, as a sworn law  
15 enforcement officer and Director of the Division, Respondent was familiar with the Act's  
16 provisions protecting information from disclosure and the need for licensing and investigatory  
17 agencies to maintain the confidentiality of information. Complainant further is informed and  
18 believes and, therefore, alleges that, as Director of the Division and a senior official in the  
19 California Department of Justice, Respondent knew that communications with attorneys were  
20 privileged from disclosure. Complainant also is informed and believes and, therefore, alleges  
21 that, as Director of the Division and a senior official in the California Department of Justice,  
22 Respondent was familiar with, and received education regarding, the State's revolving door and  
23 conflict of interest provisions.

24           7. In the fall of 2007, as the Division's Director, Respondent oversaw the regulation of  
25 gambling establishments and the Act's enforcement. As part of his duties and responsibilities,  
26 Respondent undertook to decide regulatory matters relating to, and directly participate in the  
27 regulation of, Garden City Casino (Garden City), which was located in San Jose, California.  
28 Among other things, he met with the Garden City's owners and others with respect to

1 outstanding notices of violation served on Garden City by the San Jose Police Department and  
2 the Division. He also decided, and directed the Division's employees and others, to cut back  
3 ongoing investigatory activities regarding Garden City.

4 8. During its investigation into Respondent's suitability for a state gambling license, the  
5 Bureau learned that prior to December 4, 2007, Respondent entered into negotiations with  
6 Garden City concerning prospective engagement as its compliance director. Those negotiations  
7 led to Garden City's attorney preparing a draft independent contractor agreement that was  
8 emailed to Respondent on or about December 4, 2007. Thereafter, Garden City's attorney  
9 revised the prospective agreement and emailed another draft to Respondent on or about  
10 December 24, 2007.

11 9. On December 30, 2007, Respondent retired from state service. On or about  
12 December 31, 2007, Respondent and Garden City entered into the agreement that had been in  
13 negotiation since before December 4, 2007.

14 10. Thereafter, Respondent acted as an agent for, or otherwise represented, Garden City.  
15 He made formal and informal appearances before, as well as written and oral communications  
16 to, the Bureau and its employees for the purpose of influencing administrative action. For  
17 example, in January 2008, Respondent complained to the Acting Bureau Chief that Bureau  
18 investigators were recommencing investigatory activities regarding, and conducted an  
19 unannounced visit of, Garden City.

20 11. After his retirement, Respondent acted as an agent for, or otherwise represented, other  
21 persons and entities regulated by the Bureau or under its jurisdiction. In many instances, he  
22 made formal and informal appearances before, as well as written and oral communications to,  
23 the Bureau, the Commission, and their employees for the purpose of influencing administrative  
24 action. Respondent offered his services as a designated agent, or consultant, to persons and  
25 entities in the gambling business. Not surprisingly, Respondent's past employment as the  
26 Division's Director, and in the California Department of Justice, is prominent in promoting his  
27 business.

28

1           12. During its investigation into Respondent's suitability for a state gambling license, the  
2 Bureau learned that between 2012 and 2013, Respondent solicited and received confidential  
3 information from the Bureau's Special Agent-in-Charge (SAC). Between December 27, 2012,  
4 and December 31, 2013, Respondent and the SAC contacted each other by telephone no less  
5 than 180 times.<sup>1</sup> They also communicated by text and email. The confidential information  
6 requested or provided included, among other things:

- 7           a) Respondent requested that the SAC determine whether a certain person had a  
8 criminal history. The SAC instructed Bureau employees to gather the information.  
9 The SAC then reported back to Respondent. That was a misdemeanor.
- 10           b) Respondent received copies of privileged, confidential communications between  
11 the Bureau and its attorneys with respect to entities for whom he served as  
12 designated agent. Sharing confidential information was a misdemeanor.
- 13           c) Respondent received confidential information gathered and documents prepared  
14 during the course of the Bureau's investigation with respect to persons and entities  
15 for which he served as designated agent and for Garden City. Sharing such  
16 confidential information was a misdemeanor.
- 17           d) Respondent's receipt of such information and documents potentially compromised  
18 the effectiveness, and undermined the integrity, of the Bureau's investigations.

19           13. In connection with licensing for, and investigations of, himself and others,  
20 Respondent submitted, or advised others to submit, inaccurate and misleading information to  
21 the Bureau and/or the Commission. This included, among other things:

- 22           a) In June 2011, Respondent advised the prospective food and beverage director for  
23 Garden City to submit a key employee application to the Commission. In that  
24 application, the applicant designated Respondent as his agent. Respondent signed  
25 the application. The applicant misrepresented to the Commission that his job title

26           <sup>1</sup> As part of its investigation into Respondent's suitability for a state gambling license,  
27 the Bureau requested that he provide all phone records, emails, or other written communications  
28 with the SAC from March 2012 to May 31, 2014. Respondent, however, did not provide any  
phone records for communications before December 27, 2012.

1 was "casino shift manager" and that his duties were: "assist in oversight of casino  
2 operation; monitor activities for compliance; other related duties." Respondent  
3 knew that the applicant intended to perform only food and beverage duties.

4 1) On July 1, 2011, after the Commission issued an interim key employee  
5 license to the applicant, Respondent requested that the San Jose Police  
6 Department "change the acknowledgement for a city key employee license  
7 – Casino Shift Manager, to Director of Food and Bev" at Garden City.  
8 Respondent, however, did not notify the Bureau or the Commission of this  
9 change. Instead, with Respondent as his designated agent, the applicant  
10 continued to represent that he was a casino shift manager.

11 2) On February 23, 2012, in an open meeting attended by the applicant and  
12 Respondent, the applicant represented to the Commission that he was a  
13 casino shift manager for Garden City, and not performing as food and  
14 beverage manager.

15 b) Beginning in approximately July 2012, in connection with state gambling license  
16 applications from LAX, LLC and its owner, as well as Garden City's license  
17 renewal application, and as part of the Bureau's investigation, Respondent  
18 provided the Bureau with inaccurate, incomplete, or misleading information as to,  
19 among other things, the owner's marital status, the ownership of related and  
20 affiliated entities including Garden City, payments and transactions between  
21 related and affiliated entities, the valuation of certain games and licenses,  
22 transactions with lenders, and contracts that Garden City had.

23 c) During the Bureau's investigation into Respondent's suitability for a state  
24 gambling license, Respondent provided inaccurate, incomplete, or misleading  
25 information. He also failed to provide all information and documents that the  
26 Bureau requested. During an interview by Bureau agents, Respondent failed to  
27 disclose any information regarding the receipt of confidential information and  
28 documents from the SAC.

1 14. Between May 1, 2010, and July 6, 2014, Team View Player Services, LLC (Team  
2 View) provided third-party proposition player services to Garden City. During that time,  
3 Respondent was a key employee of Garden City. Respondent received monthly payments from  
4 Team View. The Bureau first learned of these payments in connection with its investigation  
5 into Team View during 2013.

6 15. Since August 3, 2012, PT Gaming LLC (PT Gaming) has had a contract to provide  
7 third-party proposition player services to Lucky Derby, which is now The Saloon at Stones  
8 Gambling Hall. On May 23, 2013, Respondent became licensed as an owner of the Lucky  
9 Derby. Between May 23, 2013, and May 31, 2014, Respondent, through Lytle Consulting  
10 Services, Inc., received payments from PT Gaming.

#### 11 JURISDICTION

12 16. Business and Professions Code, section 19811 provides, in part:

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

16 17. Business and Professions Code, section 19823 provides:

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

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

22 (2) Assuring that there is no material involvement, directly  
23 or indirectly, with a licensed gambling operation, or the  
24 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.

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

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

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

5 \* \* \*

6 (b) For any cause deemed reasonable . . . limit, condition,  
7 or restrict any license, permit, or approval, or impose any fine  
8 upon any person licensed or approved. . . .

9 \* \* \*

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

13 19. Business and Professions Code, section 19826 provides, in part:

14 The department<sup>[2]</sup> . . . shall have all of the following responsibilities:

15 \* \* \*

16 (c) To investigate suspected violations of this chapter or  
17 laws of this state relating to gambling . . . .

18 \* \* \*

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

24 20. California Code of Regulations, title 4, section 12554 provides, in part:

25 (a) Upon the filing with the Commission of an accusation by the  
26 Bureau recommending revocation, suspension, or other discipline of a  
27 holder of a license, registration, permit, finding of suitability, or approval,

28 <sup>2</sup> "Department" refers to the Department of Justice. (Bus. & Prof. Code, § 19805, subd. (h).) Business and Professions Code section 19810 provides, in part, that "any power or authority of the department described in this chapter may be exercised by the Attorney General or any other person as the Attorney General may delegate." Effective January 1, 2008, amendments to the Act replaced all references to the Division with references to the Department. Following those amendments, the Bureau assumed the Division's powers to perform the Department's responsibilities and duties under the Act.



1 the Commission shall proceed under Chapter 5 (commencing with section  
2 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

3 \* \* \*

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

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

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

13 \* \* \*

14 (5) Impose any fine or monetary penalty consistent with  
15 Business and Professions Code sections 19930, subdivision (c),  
16 and 19943, subdivision (b)

#### 17 COST RECOVERY

18 21. Business and Professions Code, section 19930 provides, in part:

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

24 \* \* \*

25 (d) In any case in which the administrative law judge recommends  
26 that the commission revoke, suspend, or deny a license, the administrative  
27 law judge may, upon presentation of suitable proof, order the licensee or  
28 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.

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

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

9 \* \* \*

10 (f) For purposes of this section, "costs" include costs incurred for  
11 any of the following:

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

13 (2) The preparation and prosecution of the case by the  
14 Office of the Attorney General.

### 15 GAMBLING LICENSING AND PENALTY PROVISIONS

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

17 Every person . . . who receives, directly or indirectly, any  
18 compensation or reward, or any percentage or share of the money or  
19 property played, for keeping, running, or carrying on any controlled  
20 game in this state, shall apply for and obtain from the commission, and  
21 shall thereafter maintain, a valid state gambling license, key employee  
22 license, or work permit . . . . In any criminal prosecution for violation of  
23 this section, the punishment shall be as provided in Section 337j of the  
24 Penal Code.

25 23. Business and Professions Code section 19854, subdivision (b), provides:

26 No person may be issued a key employee license unless the person  
27 would qualify for a state gambling license.

28 24. Business and Professions Code section 19855 provides, in part:

[E]very person who, by statute or regulation, is required to hold a state  
license shall obtain the license prior to engaging in the activity or  
occupying the position with respect to which the license is required.

25. Business and Professions Code section 19856 provides, in part:

(a) . . . . The burden of proving his or her qualifications to receive  
any license is on the applicant.

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

4 26. Business and Professions Code, section 19857 provides:

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

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

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

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

18 27. Business and Professions Code, section 19859 provides, in part:

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

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

23 (b) Failure of the applicant to provide information,  
24 documentation, and assurances required by the Chief, or failure  
25 of the applicant to reveal any fact material to qualification, or  
26 the supplying of information that is untrue or misleading as to a  
27 material fact pertaining to the qualification criteria.

28 28. Business and Professions Code section 19866 provides:

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

29. Business and Professions Code section 19984, subdivision (a) provides:

Notwithstanding any other provision of 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:

1 (a) Any agreement, contract, or arrangement between a  
2 gambling enterprise and a third-party provider of proposition  
3 player services shall be approved in advance by the department,  
4 and in no event shall a gambling enterprise or the house have any  
5 interest, whether direct or indirect, in funds wagered, lost, or won.

6 30. Business and Professions Code section 19942, subdivision (b) provides:

7 Any person who willfully violates any of the provisions of this  
8 chapter for which a penalty is not expressly provided, is guilty of a  
9 misdemeanor.

10 **INFORMATION PROTECTION PROVISIONS**

11 31. Business and Professions Code section 19821 provides, in part:

12 (c) . . . Except as provided in this chapter, the records of the  
13 department and the commission are exempt from disclosure under  
14 Chapter 3.5 (commencing with Section 6250) of Division 7 of Title 1  
15 of the Government Code [the Public Records Act].

16 (d) Except as necessary for the administration of this chapter, . . .  
17 no official, employee, or agent of the commission or the department,  
18 having obtained access to confidential records or information in the  
19 performance of duties pursuant to this chapter, shall knowingly disclose  
20 or furnish the records or information, or any part thereof, to any person  
21 who is not authorized by law to receive it. A violation of this  
22 subdivision is a misdemeanor.

23 **REVOLVING DOOR AND CONFLICT OF INTEREST PROVISIONS**

24 32. Business and Professions Code section 19981, subdivision (a) presently provides, in  
25 part:

26 [T]he chief, and any employee of the . . . department designated by  
27 regulation, shall not, for a period of three years after leaving office or  
28 terminating employment, for compensation, act as agent . . . for, or  
otherwise represent, any other person by making any formal or informal  
appearance, or by making any oral or written communication, before the  
commission or the department, or any officer or employee thereof, if the  
appearance or communication is for the purpose of influencing  
administrative action, or influencing any action or proceeding involving  
the issuance, amendment, awarding, or revocation of a permit, license, or  
approval.

33. On December 31, 2007, Business and Professions Code section 19981, subdivision  
(a) provided, in part:

1 [T]he director, and any employee of the . . . division designated by  
2 regulation, shall not, for a period of three years after leaving office or  
3 terminating employment, for compensation, act as agent . . . for, or  
4 otherwise represent, any other person by making any formal or informal  
5 appearance, or by making any oral or written communication, before the  
6 commission or the department, or any officer or employee thereof, if the  
7 appearance or communication is for the purpose of influencing  
8 administrative action, or influencing any action or proceeding involving  
9 the issuance, amendment, awarding, or revocation of a permit, license, or  
10 approval.

11 34. Government Code section 87100 provides:

12 No public official at any level of state or local government shall  
13 make, participate in making or in any way attempt to use his official  
14 position to influence a government decision in which he knows or has  
15 reason to know he has a financial interest.

16 35. Government Code section 87406, subdivision (d)(1) provides, in part:

17 No designated employee of a state administrative agency, any  
18 officer, employee, or consultant of a state administrative agency who  
19 holds a position which entails the making, or participation in making,  
20 of decisions which may foreseeably have a material effect on any  
21 financial interest, . . . for a period of one year after leaving office or  
22 employment, shall, for compensation, act as agent . . . for, or  
23 otherwise represent, any other person by making any formal or  
24 informal appearance, or by making any oral or written communication,  
25 before any state administrative agency, or officer or employee thereof,  
26 for which he or she worked or represented in the 12 months before  
27 leaving office or employment, if the appearance or communication is  
28 made for the purpose of influencing administrative or legislative  
action, or influencing any action or proceeding involving the issuance,  
amendment, awarding, or revocation of a permit, license, grant, or  
contract . . . .

36. Government Code section 87407 provides:

No public official shall make, participate in making, or use his or  
her official position to influence, any governmental decision relating  
to any person with whom he or she is negotiating, or has any  
arrangement concerning, prospective employment.

37. Government Code section 91000, subdivision (a) provides:

Any person who knowingly or willfully violates any provision of  
this title is guilty of a misdemeanor.

1 **FIRST CAUSE FOR DISCIPLINE**  
2 **(Unqualified for Continued Licensure)**

3 38. Respondent's licenses are subject to discipline, pursuant to Business and Professions  
4 Code sections 19823 and 19857, subdivisions (a) and (b). Respondent's continued licensure is  
5 inimical to public health, safety, and welfare. Respondent is not a person of good character,  
6 honesty, and integrity. His prior activities pose a threat to the effective regulation and control of  
7 controlled gambling, and create or enhance the dangers of unsuitable, unfair, or illegal practices,  
8 methods, and activities in carrying on the business and financial arrangements incidental to the  
9 conduct of controlled gambling. Respondent's conduct in his affairs demonstrates that he is  
10 unqualified for licensure. That conduct includes the acts and omissions alleged above.

11 **SECOND CAUSE FOR DISCIPLINE**  
12 **(Providing Untrue or Misleading Information to the Bureau)**

13 39. Respondent's license is subject to discipline, pursuant to Business and Professions  
14 Code sections 19823, 19857, subdivisions (a) and (b), and 19859, subdivisions (a) and (b).  
15 Respondent's continued licensure is inimical to public health, safety, and welfare. Respondent  
16 is not a person of good character, honesty, and integrity. His prior activities pose a threat to the  
17 effective regulation and control of controlled gambling, and create or enhance the dangers of  
18 unsuitable, unfair, or illegal practices, methods, and activities in carrying on the business and  
19 financial arrangements incidental to the conduct of controlled gambling. Respondent supplied  
20 untrue or misleading information as to material facts pertaining to his qualification criteria.  
21 Additionally, he assisted others in supplying untrue or misleading information as to material  
22 facts pertaining to the qualification criteria of others.

23 **THIRD CAUSE FOR DISCIPLINE**  
24 **(Failure To Provide Information and Documentation Requested by the Chief)**

25 40. Respondent's license is subject to discipline, pursuant to Business and Professions  
26 Code sections 19823, 19857, subdivisions (a) and (b), and 19859, subdivisions (a) and (b).  
27 Respondent's continued licensure is inimical to public health, safety, and welfare. Respondent  
28 is not a person of good character, honesty, and integrity. His prior activities pose a threat to the

1 effective regulation and control of controlled gambling, and create or enhance the dangers of  
2 unsuitable, unfair, or illegal practices, methods, and activities in carrying on the business and  
3 financial arrangements incidental to the conduct of controlled gambling. Respondent failed to  
4 provide information and documents requested by the Bureau acting on the Complainant's  
5 behalf. Additionally, Respondent assisted others in failing to provide information and  
6 documents requested by the Bureau acting on the Complainant's behalf.

7 **FOURTH CAUSE FOR DISCIPLINE**

8 **(Prohibited Interests in the Funds Wagered, Lost, or Won by a Third-Party Provider)**

9 41. Respondent's licenses are subject to discipline, pursuant to Business and Professions  
10 Code sections 19823, 19857, subdivisions (a) and (b), and 19859, subdivisions (a) and (b).  
11 Respondent's continued licensure is inimical to public health, safety, and welfare. Respondent  
12 is not a person of good character, honesty, and integrity. His prior activities pose a threat to the  
13 effective regulation and control of controlled gambling, and create or enhance the dangers of  
14 unsuitable, unfair, or illegal practices, methods, and activities in carrying on the business and  
15 financial arrangements incidental to the conduct of controlled gambling. Through wholly  
16 owned entities, Respondent had an indirect interest in funds wagered, lost, or won by Team  
17 View. Respondent also had an indirect interest in funds wagered, lost, or won by PT Gaming.  
18 Business and Professions Code section 19984, subdivision (a) prohibits the receipt of such  
19 payments.

20 **PRAYER**


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

- 23 1. Revoking California State Gambling Establishment Key Employee License Number  
24 GEKE-001373, temporary state gambling license (GEOW-003415), and temporary state  
25 gambling license (GEOW-3416) issued to Robert E. Lytle;  
26 2. Fining Robert E. Lytle in an amount according to proof;
- 27  
28

1           3. Awarding Complainant the costs of investigation and costs of bringing this  
2 Accusation before the Commission, pursuant to Business and Professions Code section 19930,  
3 subdivisions (d) and (f), in a sum according to proof; and

4           4. Taking such other and further action as the Commission may deem appropriate.  
5

6 Dated: December 23, 2014

  
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WAYNE J. QUINT, JR., Chief  
Bureau of Gambling Control  
California Department of Justice

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