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

14 In the Matter of the Accusation Against:	BGC Case No. HQ2014-00005AL
15 ROBERT E. LYTLE	OAH No.
16 9360 Blue Oak Drive	<u>ACCUSATION</u>
17 Orangevale, CA 95662	
18 LICENSE NUMBERS:	
19 GEKE-001373	
20 GEOW-003415	
21 GEOW-003416	

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 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.

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