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

13  
14 In the Matter of the Accusation Against:

15 LUCKY CHANCES, INC., a California  
Corporation dba LUCKY CHANCES  
16 CASINO

17 LICENSE NUMBER GEOW-002757

18 ROMMEL MEDINA, Chief Executive Officer  
and Shareholder

20 LICENSE NUMBER GEOW-001327

21 RUELL MEDINA, Chief Financial Officer and  
22 Shareholder

23 LICENSE NUMBER GEOW-001326

24 1700 Hillside Boulevard  
25 Colma, California 94014

26 Respondents.

BGC Case No. HQ2015-00002AC

OAH No.: \_\_\_\_\_

**ACCUSATION**

1 Complainant alleges as follows:

2 **PARTIES**

3 1. Wayne J. Quint, Jr. (Complainant) brings this Accusation solely in his official  
4 capacity as the Chief of the California Department of Justice, Bureau of Gambling Control  
5 (Bureau).

6 2. On October 1, 2013, the California Gambling Control Commission (Commission)  
7 issued an Owner's Gambling License, license number GEOW-002757, to Lucky Chances, Inc.,  
8 dba Lucky Chances Casino, gambling establishment license number GEGE-001108. Also on  
9 October 1, 2013, the Commission issued Owner's Gambling Licenses to Rommel Medina, Chief  
10 Executive Officer and Shareholder, license number GEOW-001327, and to Ruell Medina, Chief  
11 Operating Officer and Shareholder, license number GEOW-001326. These parties are  
12 collectively referred to herein as "Lucky Chances." The licenses identified in this paragraph will  
13 expire on September 30, 2015, unless renewed.

14 **FIRST CAUSE OF ACTION FOR DISCIPLINE**

15 **(Violation of License Condition Five)**

16 3. When the Commission issued the licenses described in paragraph 2, above, the  
17 licenses were issued upon five conditions intended to disassociate Rene Medina from the Lucky  
18 Chances Casino. Condition number five requires "any communication between Rene Medina and  
19 any shareholder or employee of Lucky Chances concerning the operation of the Lucky Chances  
20 card room business" to be disclosed to the Executive Director (of the Commission) and the  
21 Bureau Chief (Complainant) within one business day of any such communication, and this  
22 applies to both oral and written communications. Such disclosures are to be made in writing, and  
23 the General Manager (of Lucky Chances) is required to maintain records documenting each  
24 disclosure for four years following the disclosure. On multiple occasions in 2013 and 2014,  
25 Lucky Chances provided construction, landscaping, housekeeping, and other valuable services  
26 incident to the construction of Rene and his wife, Mila, Medina's home, which is variously  
27 referred to as located at 50 Valley Road, Atherton, California, or 50 Valley Court, Woodside,  
28 California, both of which identify the same location. The wages, salaries, and other costs

1 incurred by Lucky Chances in connection with this work were paid from the operating funds of  
2 Lucky Chances, Inc., which, in turn, derived from the proceeds of controlled gambling activities.  
3 In order to schedule and coordinate the diversion of Lucky Chances' employees from their  
4 ordinary duties at the Lucky Chances Casino to work on his home in Woodside, California, Rene  
5 Medina communicated on numerous occasions with the employees and/or their supervisors.  
6 None of these communications between Rene Medina and Lucky Chances' employees were  
7 disclosed to the Executive Director or the Bureau Chief, and each such undisclosed  
8 communication constituted a violation of condition five of Lucky Chances' license.

9 (Bus. & Prof. Code, §§ 19857, subs. (a) & (b); 19920, 19922; Cal. Code Regs., tit. 4, §§  
10 12566, subd. (c)(1), 12568, subd. (a)(1).)

## 11 **SECOND CAUSE OF ACTION FOR DISCIPLINE**

### 12 **(Violation of License Condition Three)**

13 4. When the Commission issued the licenses described in paragraph 2, above, the  
14 licenses were issued upon five conditions intended to disassociate Rene Medina from the Lucky  
15 Chances Casino. Condition number three provides that Ruell Medina and Rommel Medina, as  
16 licensed shareholders in Lucky Chances, Inc., are individually responsible for ensuring that all  
17 conditions placed on the Lucky Chances license are fully complied with, including but not limited  
18 to the duties placed upon the General Manager. Neither Ruell Medina, nor Rommel Medina took  
19 any actions to ensure compliance with condition five of the Lucky Chances license, and thus  
20 violated condition three of the Lucky Chances license.

21 (Bus. & Prof. Code, §§ 19857, subs. (a) & (b); 19920, 19922; Cal. Code Regs., tit. 4, §  
22 12566, subd. (c)(1), 12568, subd. (a)(1).)

## 23 **JURISDICTION**

24 5. Business and Professions Code, section 19823 provides:

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

27 (1) Assuring that licenses, approvals, and permits are not issued  
28 to, or held by, unqualified or disqualified persons, or by persons whose