

**STATE OF ILLINOIS  
IN THE ILLINOIS GAMING BOARD**

**IN RE: THE DISCIPLINARY ACTION OF** )  
 )  
 ) **NO. DC-C-20-001**  
**DAKOTA ERIC RICHARDSON,** )  
 )  
**LEVEL 2 OCCUPATIONAL LICENSEE.** )

*Via Regular & Certified U.S. Mail*

Dakota Eric Richardson  


**License No. 18F105342**

**COMPLAINT FOR DISCIPLINARY ACTION**

The ILLINOIS GAMING BOARD (the "Board" or "IGB") in its Complaint against **DAKOTA ERIC RICHARDSON** ("Richardson"), the above-named occupational licensee, states as follows:

**NATURE OF ACTION**

1. This action is brought against Richardson because he violated certain provisions of the Illinois Gambling Act ("the Act" or "IGA") that require occupational license holders to comply with the rules and regulations of the Board during their term of licensure to work for a Casino Gambling Operation. 230 ILCS 10/9(e).
2. This action is brought pursuant to Subsections 5(b)(2), 5(c)(2), 5(c)(5), 5(c)(11), 5(c)(15) and 9(e) of the Act and Section 3000.110 of the Adopted Rules of the Illinois Gaming Board ("the Rules"). 230 ILCS 10/5; 230 ILCS 10/9; 86 Ill. Adm. Code § 3000.110.
3. The Board has all the powers necessary to administer, regulate and enforce the system of gambling established under the Act; and its jurisdiction extends to every person, association, corporation, partnership, and trust involved in gambling operations in Illinois, pursuant to Section 5(a)(1) of the Act. 230 ILCS 10/5(a)(1).
4. All persons granted an occupational license under the Act are required to comply with it and all federal, state or local laws or regulations, pursuant to Section 3000.110(a)(1) of the Rules. 86 Ill. Adm. Code § 3000.110(a)(1).

**PARTIES**

5. The Board is the Illinois regulatory agency charged with the responsibility of administering, regulating, and enforcing the system of gambling established by the Act. 230 ILCS 10/5(a)(1).

6. Richardson is an occupational licensee holding a Level 2 license that the Board issued to him on or around August 2, 2018. At all times relevant hereto, Richardson was working as a security officer at the Harrah's Metropolis Casino ("Harrah's") located in Metropolis, Illinois.

### FACTS

7. On May 18, 2019, Richardson resigned from employment with Harrah's shortly after the casino's internal security officers started investigating him for allegedly having threatened a co-worker with physical harm.
8. A Harrah's security officer determined that Richardson and another Harrah's employee told Richardson's co-worker they were going to "beat [him] up," and made other comments intimating they were going to put a spark plug in the gas tank of his car so that it would explode when he started it.
9. A different Harrah's security officer overheard Richardson and his apparent co-conspirator saying they wanted to get the same co-worker in trouble by assisting a minor onto the casino floor while that co-worker was working the casino's entrance turnstiles and thereby make him appear derelict in performing his job duties.

### COUNT I

**(86 Ill. Admin. Code § 3000.110(a))**

10. The Board re-alleges Paragraphs 1 through 9 of the Disciplinary Complaint as if fully alleged in this Count and incorporates them herein by reference.
11. Pursuant to Section 3000.110(a) of the Rules, a holder of any license shall be subject to fines, suspension, or revocation of his license if either he engages in activity that would discredit or tend to discredit the Illinois gaming industry or the State of Illinois. Such activities include, but are not limited to, failing to comply with the Act, the Rules, an Owner Licensee's internal controls system, or any federal, state or local law or regulation. 86 Ill. Adm. Code § 3000.110(a).
12. Richardson is subject to disciplinary measures under Section 3000.110(a) of the Rules because he violated company policies, which does not tolerate violence against casino patrons, coworkers and/or others; conduct, which discredits or tends to discredit the Illinois gaming industry and the State of Illinois.

WHEREFORE, based on the foregoing, Richardson should be disciplined in a manner deemed appropriate by the Board.

### COUNT II

**(230 ILCS 10/9(e)(1), 9(e)(2))**

13. The Board re-alleges Paragraphs 1 through 12 of the Disciplinary Complaint as if fully alleged in this Count and incorporates them herein by reference.
14. Section 9(e) of the Act states the Board may suspend, revoke, or restrict any occupational licensee for violations of any provision of this Act or for violations of any of the rules and regulations of this Board. 230 ILCS 10/9(e)(1), 9(e)(2).

15. Richardson failed to abide by employer policies and state law and instead acted in ways injurious to the public health, safety, morals, good order and general welfare of the people of the State of Illinois, in violation of Sections 3000.110(a) and 3000.110(b) of the Rules. Accordingly, the Board has the authority to suspend, revoke, or restrict Richardson's occupational license under Section 9(e) of the Act.

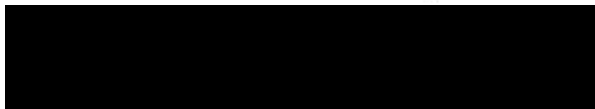
WHEREFORE, based on the foregoing, Richardson should be disciplined in a manner deemed appropriate by the Board.

**COUNT III**  
**(230 ILCS 10/9(e)(5))**

16. The Board re-alleges Paragraphs 1 through 15 of the Disciplinary Complaint as if fully alleged in this Count and incorporates them herein by reference.
17. Pursuant to Sections 9(e)(5) of the IGA, "[t]he Board may suspend, revoke or restrict" any licensee for any just cause. 230 ILCS 10/9(e)(5).
18. Richardson's conduct resulted in violations of Sections 3000.110(a) and 3000.110(b) of the Rules, and Sections 9(e)(1) and 9(e)(2) of the IGA. Accordingly his conduct provides just cause for Board action against his license.

WHEREFORE, based on the foregoing, Richardson should be disciplined in a manner deemed appropriate by the Board.

Illinois Gaming Board,



Marcus Fruchter  
Administrator

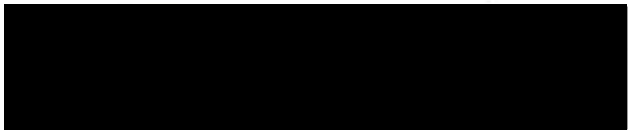
Dated this 31st day of January, 2020.

**NOTIFICATION OF DISCIPLINARY ACTION**

The Illinois Gaming Board, upon review of the Disciplinary Action and a summary of the evidence, finds facts sufficient to authorize the issuance of a Disciplinary Complaint against occupational licensee DAKOTA ERIC RICHARDSON (“Richardson”) and to impose the following discipline:

The occupational license of Richardson shall be revoked for violations of the Illinois Gambling Act and the Adopted Rules, as set forth in Disciplinary Complaint, No. DC-C-20-001, unless Richardson files an Answer to the Disciplinary Complaint within 21 days from the date of service of the Complaint pursuant to Rule 3000.1125, 86 Ill. Adm. Code § 3000.1125. If you choose to file an Answer, which complies with every requirement of Rule 3000.1125, a hearing officer will be appointed. The Answer shall be mailed to: Illinois Gaming Board c/o Legal Department, 160 N. LaSalle Street, Suite 300, Chicago, IL 60601.

Illinois Gaming Board



Marcus Fruchter  
Administrator

Dated this 31st day of January, 2020

