

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

**IN RE: THE DISCIPLINARY ACTION OF)
)
) NO. DC-C-20-003
DANIEL TORRES,)
)
LEVEL 3 OCCUPATIONAL LICENSEE.)**

Via Regular & Certified U.S. Mail

Daniel Torres

License No. 19H157783

COMPLAINT FOR DISCIPLINARY ACTION

The ILLINOIS GAMING BOARD (the "Board" or "IGB") in its Complaint against **DANIEL TORRES** ("Torres"), the above-named occupational licensee, states as follows:

NATURE OF ACTION

1. This action is brought against Torres 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. Torres is an occupational licensee holding a Level 3 license that the Board issued to him on or around June 3, 2019. At all times relevant hereto, Torres was working as a restaurant manager at the Reserve Restaurant in Harrah's Joliet Casino ("Harrah's"), located in Joliet, Illinois.

FACTS

7. On November 13, 2019 a Harrah's Security Manager signed a complaint against Torres who Illinois State Police then arrested for misdemeanor theft and transferred to the Joliet Police Department for processing.
8. That arrest followed an investigation by Harrah's security and IGB agents which concluded Torres wrongfully directed subordinates and/or acted directly to void bills from both his personal food orders and those of others he was dining with at the Reserve Restaurant of Harrah's Joliet Casino, repeatedly eating/drinking there without paying the monies owed for same.
9. On November 21, 2019 Harrah's Casino terminated Torres from employment.

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 control system or any federal, state or local law or regulation. 86 Ill. Adm. Code § 3000.110(a).
12. Torres is subject to disciplinary measures under Section 3000.110(a) of the Rules because he violated company policies against misappropriating company property; conduct, which discredits or tends to discredit the Illinois gaming industry and the State of Illinois.

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

COUNT II

(86 Ill. Adm. Code § 3000.110(b))

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. Pursuant to Section 3000.110(b) of the Rules, an employee whose employment at a Casino Gambling Operation has been terminated is subject to license revocation for any act which occurred while employed at any Casino Gambling Operation. 86 Ill. Adm. Code § 3000.110(b).
15. Torres is subject to revocation of his occupational license under Rule 3000.110(b) because Harrah's terminated his employment at a Casino Gambling Operation for actions which violated its Code of Conduct; action(s) which occurred while he was so employed.

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

COUNT III
(230 ILCS 10/9(e)(1), 9(e)(2))

16. The Board re-alleges Paragraphs 1 through 13 of the Disciplinary Complaint as if fully alleged in this Count and incorporates them herein by reference.
17. 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).
18. Torres 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 Torres' occupational license under Section 9(e) of the Act.

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

COUNT IV
(230 ILCS 10/9(e)(5))

19. The Board re-alleges Paragraphs 1 through 18 of the Disciplinary Complaint as if fully alleged in this Count and incorporates them herein by reference.
20. 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).
21. Torres'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 her license.

WHEREFORE, based on the foregoing, Torres 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 DANIEL TORRES ("Torres") and to impose the following discipline:

The occupational license of Torres shall be revoked for violations of the Illinois Gambling Act and the Adopted Rules, as set forth in Disciplinary Complaint, No. DC-C-20-003, unless Torres 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

