

**STATE OF ILLINOIS
ILLINOIS GAMING BOARD**

IN RE THE DISCIPLINARY ACTION OF:

**Ruben's Bar & Grill, LLC d/b/a
Ruben's Bar & Grill
Licensed Establishment 180701208**

DC-V-22-02

COMPLAINT FOR PROPOSED DISCIPLINARY ACTION

The Illinois Gaming Board, for its Complaint against Ruben's Bar & Grill, LLC, states as follows:

NATURE OF ACTION

1. The Illinois Gaming Board (the "Board" or "IGB") brings this action against licensed establishment Ruben's Bar & Grill, LLC ("Ruben's") for failing to maintain a valid local liquor license.
2. Ruben's conduct violates provisions of the Video Gaming Act ("VGA") and the Rules prohibiting Board licensees from engaging in any conduct that would discredit, or tend to discredit, or reflect adversely on the integrity of the Illinois gaming industry, including but not limited to failing to comply with all laws and the Rules.
3. The Board brings this action pursuant to Sections 55, 78(a)(2), 78(a)(3) and 80 of the VGA; Section 17 of the Illinois Gambling Act; and Sections 5(b)(2), and 5(c)(5) of the IGA; and Sections 1800.210, 1800.270 and 1800.310 of the Rules.

FACTS

4. The Board is the Illinois regulatory agency charged with the responsibility of administering, regulating and enforcing the system of gambling in Illinois, including all video gaming. The Board's jurisdiction extends to every person, association, corporation, partnership, and trust involved in Illinois video gaming operations.

5. Ruben's is a licensed location operating in Prospect Heights. As a licensee, Ruben's, its employees, and its agents are required to comply with the VGA and the Rules.

6. As a precondition for licensure, all licensed establishments must have a valid liquor license at the time of application and at all times thereafter.

7. Licensed establishments have an ongoing duty to commit no violations of the laws concerning the sale, dispensing or consumption on premises of alcoholic beverages that results in suspension or revocation of any liquor license.

8. A licensed establishment is defined, in part as, a location "where alcoholic liquor is drawn, poured, mixed, or otherwise served for consumption on the premises."

9. On December 21, 2021, Ruben's 100% owner was arrested and charged with felony offenses related to improper contact with a minor.

10. On April 29, 2022, the City of Prospect Heights informed Ruben's that its local liquor license would not be renewed.

11. Ruben's local liquor license expires on April 30, 2022 at 11:59 P.M.

11. On information and belief, the City of Prospect Heights refused to renew Ruben's local liquor license because of the December 21, 2021 charges against Ruben's owner.

12. Board Rule 310 subjects any licensee to discipline for failing to comply with any state or local law or regulation.

COUNT I
FAILING TO MAINTAIN A LIQUOR LICENSE
IN VIOLATION OF RULE 310(a)(22)

13. The Board re-alleges and incorporates Paragraphs 1 through 12 above as if fully alleged herein.

14. Rule 310 subjects a licensee to discipline for failing to maintain the minimum qualifications for licensure.

15. By losing its local liquor license, Ruben's can no longer draw, pour, mix, or otherwise serve alcohol for consumption on the premises after April 30, 2022 at 11:59 P.M.

16. Effective May 1, 2022, Ruben's no longer meets the statutory definition of a licensed establishment because it alcohol cannot be drawn, poured, mixed, or otherwise served for consumption on the premises.

WHEREFORE, based on the foregoing, RUBEN'S's licensed establishment license should be REVOKED. Per Section 17 of the Illinois Gambling Act, RUBEN'S's license is summarily suspended pending the outcome of this Complaint.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Daniel Gerber.

Dated: April 30, 2022

Daniel Gerber
General Counsel

ISSUED UNDER THE AUTHORITY OF THE ADMINISTRATOR PER RULE 715

NOTIFICATION OF PROPOSED DISCIPLINARY ACTION

Pursuant to Rule 715 [11 Ill. Adm. Code 1800.715] the Administrator finds facts sufficient to authorize the issuance of a Disciplinary Complaint against Ruben's Bar & Grill, LLC d/b/a Ruben's Bar & Grill, LLC and to propose its license be REVOKED. RUBEN'S's license is SUMMARILY SUSPENDED effective May 1, 2022 until there is a final order addressing this discipline.

If you choose to file an Answer, it will not be accepted unless it complies with every requirement listed in Section 720 of the Rules [11 Ill. Adm. Code 1800.720]. If you file an Answer that complies with all requirements under Rule 720, a hearing officer will be appointed to conduct a hearing. Failure to file an Answer within 21 days of receiving this Complaint will result in the proposed disciplinary action becoming effective and final. The Answer shall be mailed to:

Illinois Gaming Board
Attn: Legal Department
160 N. LaSalle St., Suite 300
Chicago, IL 60601

OR IGB.Legal@Illinois.Gov

Dated: April 30, 2022



Daniel Gerber
General Counsel

ISSUED UNDER THE AUTHORITY OF THE ADMINISTRATOR PER RULE 715