

**STATE OF ILLINOIS
ILLINOIS GAMING BOARD**

IN RE THE DISCIPLINARY ACTION OF:

**Winner\$, LLC
d/b/a Winners LLC**

**Licensed Establishment
(License No. 150700522)**

DC-V-22-05

COMPLAINT FOR PROPOSED DISCIPLINARY ACTION

The Illinois Gaming Board, for its Complaint against Winner\$, LLC d/b/a Winners LLC states as follows:

NATURE OF ACTION

1. The Illinois Gaming Board (the “Board” or “IGB”) brings this action against licensed establishment Winner\$, LLC d/b/a Winners LLC (“Winners”) (License No. 150700522) for engaging in owner recreational use of the video game terminals located in owner’s establishment in violation of the Illinois Gambling Act (the “IGA”), Video Gaming Act (the “VGA”) and the Board’s Adopted Rules (the “Rules”).

2. Winners’ conduct violates provisions of the VGA, the IGA and the Rules that prohibit 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 the failure to comply with the Rules by engaging in owner recreational use of the video game terminals in owner’s establishment.

3. The Board brings this action pursuant to VGA Sections 78(a)(2), 78(a)(3) and 80; IGA Sections 5(b)(2), 5(b)(13), 5(c)(5), 5(c)(11), and 5(c)(15); and Rules 210, 270 and 310. 230

ILCS 40/78; 230 ILCS 40/80; 230 ILCS 10/5; 11 Ill. Adm. Code 1800.210, 1800.270 and 1800.310.

4. Through this action, the Board seeks to revoke Winners' establishment license.

PARTIES AND RELEVANT ENTITIES

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

6. Respondent Winners is a licensed establishment (License No. 150700522) and has been licensed since July 23, 2015. As a licensed establishment, Winners is required to comply with the IGA, VGA, Administrative Code and the Rules at all times.

RELEVANT FACTUAL BACKGROUND

7. On or around August 18, 2020, IGB agents received a hotline complaint that Winners's Owner engaged in recreational use of the video gaming terminals located in the establishment on several occasions.

8. On or around August 18, 2020, IGB agent interviewed the Winners's Owner.

9. During the interview, the Owner confirmed recreational use of the video gaming terminals as reported by the hotline complaint.

COUNT I

Owner Recreational Use in Violation of Section 210

10. The Board re-alleges and incorporates Paragraphs 1 through 9 above as if fully alleged herein.

11. Rule 210 imposes a duty on all licensees to conduct their video gaming operations in a manner that does not discredit or tend to discredit the Illinois gaming industry or the State of Illinois.

12. Rule 310 subjects a holder of any license issued under the Act to discipline for failing to comply with the Rules.

13. Engaging in recreational use of the video gaming terminals by the owner located in owner's establishment adversely reflects on the security and integrity of the Illinois video gaming industry and discredits the State of Illinois gaming industry.

14. Because the Owner of Winners engaged in recreational use of the establishment's video gaming terminals, Winners has adversely reflected on the security and integrity of the Illinois video gaming industry and discredited the Illinois Gaming Industry.

15. By engaging in the conduct described above, Winners is subject to discipline pursuant to Rule 310.

WHEREFORE, based on the foregoing, Winners should be revoked.

COUNT II
Owner Recreational Use in Violation of Section 1800.270(r)

16. The Board re-alleges and incorporates Paragraphs 1 through 9 above as if fully alleged herein.

17. Pursuant to Section 1800.270(r) of the Rules, each licensed video gaming location has an ongoing duty to "ensure that video gaming terminals at the location are not played for recreational purposes by an owner, person with significant influence or control, or video gaming manager of the location."

18. Rule 310 subjects a holder of any license issued under the Act to discipline for failing to comply with the Rules.

19. By permitting its owner to recreationally play the Winners' video gaming terminals, Winners violated Section 1800.270(r).

20. Because Winners violated Section 1800.270(r), Winners is subject to discipline under Rule 310.

WHEREFORE, based on the foregoing, Winners should be revoked.

Dated: July 18, 2022

Respectfully submitted,



Daniel Gerber
General Counsel
Illinois Gaming Board

***ISSUED UNDER THE AUTHORITY OF THE ADMINISTRATOR OF
THE ILLINOIS GAMING BOARD***

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 Winner\$, LLC d/b/a Winners LLC. and with the proposed discipline of a \$1,500 FINE.

Winner\$, LLC d/b/a Winners LLC. shall be FINED \$1,500 for violations of the Video Gaming Act and the Adopted Rules, as set forth in Disciplinary Complaint No. DC-V-22-05 unless it files an answer to the Disciplinary Complaint within 21 days from the date of service of the complaint.

Payments should be sent to:

Illinois Gaming Board
Revenue Accounting Unit
801 South Seventh Street, Suite 400 - South
Springfield, Illinois 62703

OR Made Electronically By [Clicking Here](#)

If Winners chooses 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 should be mailed to:

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

OR IGB.LEGAL@illinois.gov

Failure to pay the fine or file an Answer within 21 days of receiving this may result additional discipline, up to revocation of your license.

Dated: July 18, 2022



Daniel Gerber
General Counsel
Illinois Gaming Board