

**STATE OF ILLINOIS
ILLINOIS GAMING BOARD**

IN RE THE DISCIPLINARY ACTION OF:

Crusen & Klein, Inc. d/b/a Crusen's II

Licensed Video Gaming Location

DC-V-22-09

License No. 130704824

COMPLAINT FOR DISCIPLINARY ACTION

The Illinois Gaming Board, for its Complaint against Crusen & Klein, Inc. d/b/a Crusen's II, states as follows:

NATURE OF ACTION

1. The Illinois Gaming Board (the "Board" or "IGB") brings this action against licensed video gaming location Crusen & Klein, Inc. d/b/a Crusen's II ("Crusen") for its behavior in violation of the Video Gaming Act (the "VGA") and the Board's Adopted Rules for Video Gaming (the "Rules").

2. The Board brings this action pursuant to Sections 45 and 78 of the VGA, 230 ILCS 40/1 et seq., and Sections 210 and 310 of the Rules, 11 Ill. Adm. Code 1800.110 et seq.

3. Through this action, the Board seeks to fine Crusen \$5,000.

PARTIES

4. Crusen is a licensed establishment under the Video Gaming Act. As a licensed establishment, Crusen, its employees, and its agents are required to comply with the VGA and the Rules at all times.

5. The Board is the Illinois state agency responsible for administering, regulating, and enforcing the system of video gaming in Illinois. Pursuant to Section 78 of the VGA, the Board has jurisdiction over and shall supervise all gaming operations governed by the VGA including,

but not limited to, the conduct of licensees. The Board's jurisdiction extends to every person, association, corporation, partnership, and trust involved in video gaming operations in Illinois.

FACTS

6. On August 1, 2020, a Crusen patron was arrested and charged with Aggravated Battery of a Firefighter/EMS, Possession of Controlled Substance, and Resisting/Obstructing a Peace Officer after an altercation occurred in Crusen's parking lot.

7. On August 13, 2020, at approximately 11:45 p.m., an unsecured, defaced handgun was located on the dance floor of the establishment.

8. On August 14, 2020, the IGB learned that, in an unrelated incident, two Crusen patrons were stabbed on August 13, 2020.

9. As a result of the stabbing, a Crusen patron was charged with Unlawful Use of Weapon.

COUNT I **Conduct Injurious to the Public**

10. The Board alleges paragraphs 1-9 as if restated herein.

11. Rule 310 provides that licensees shall be subject to a disciplinary action for "any act or failure to act by themselves or by their agents or employees that is injurious to the public health, safety, morals, good order and general welfare of the people of the State of Illinois, or that would discredit or tend to discredit the Illinois video gaming industry or the State of Illinois."

12. By failing to secure the safety of its patrons, Crusen violated of Rule 310(a), thus subject to discipline.

COUNT II **Threat to Public Health and Safety**

13. The Board alleges paragraphs 1-10 as if restated herein.

14. Rule 310 provides that licensees shall be subject to a disciplinary action for “any act or failure to act by themselves or by their agents or employees that is injurious to the public health, safety, morals, good order and general welfare of the people of the State of Illinois, or that would discredit or tend to discredit the Illinois video gaming industry or the State of Illinois.”

15. Rule 310 also provides that “[f]ailing to comply with or make provision for compliance with the Act, this Part, any federal, State or local law or regulation, or a control system or protocol mandated by the Board” may be grounds for discipline.

16. Rule 210 provides that each licensee has an ongoing duty to comply with all federal, State, or local laws and regulations.

17. Rule 210(d) also provides that each licensee has an ongoing duty to conduct its operations “in a manner that does not pose a threat to the public health, safety, morals, good order or general welfare of the people of the State of Illinois”

18. By failing to secure the safety of its patrons, Crusen violated of Rule 210(d), thus subject to discipline.

COUNT III
Discredit the Gaming Industry

19. The Board alleges paragraphs 1-9 as if restated herein.

20. Rule 310 provides that licensees shall be subject to a disciplinary action for “any act or failure to act by themselves or by their agents or employees that is injurious to the public health, safety, morals, good order and general welfare of the people of the State of Illinois, or that would discredit or tend to discredit the Illinois video gaming industry or the State of Illinois.”

21. Rule 310 also provides that “[f]ailing to comply with or make provision for compliance with the Act, this Part, any federal, State or local law or regulation, or a control system or protocol mandated by the Board” may be grounds for discipline.

22. Rule 210 provides that each licensee has an ongoing duty to comply with all federal, State, or local laws and regulations.

23. Rule 210(e) provides that each licensee has an ongoing duty to conduct the licensee's video gaming operation in a manner that does not discredit or tend to discredit the Illinois gaming industry or the State of Illinois.

24. By failing to secure the safety of its patrons, Crusen violates of Rule 210(e), thus subject to discipline.

COUNT IV

Adversely Reflect on the Security or Integrity of the Gaming Industry

25. The Board alleges paragraphs 1-9 as if restated herein.

26. Rule 310 provides that licensees shall be subject to a disciplinary action for “any act or failure to act by themselves or by their agents or employees that is injurious to the public health, safety, morals, good order and general welfare of the people of the State of Illinois, or that would discredit or tend to discredit the Illinois video gaming industry or the State of Illinois.”

27. Rule 310 also provides that “[f]ailing to comply with or make provision for compliance with the Act, this Part, any federal, State or local law or regulation, or a control system or protocol mandated by the Board” may be grounds for discipline.

28. Rule 210 provides that each licensee has an ongoing duty to comply with all federal, State, or local laws and regulations.

29. Rule 210 (f) describes the general duties of licensees, and provides that each licensee has an ongoing duty to conduct the licensee's video gaming operation in a manner that does not reflect adversely on the security or integrity of the Illinois video gaming industry.

30. By failing to secure the safety of its patrons, Crusen's was in violation of Rule 210(e), thus subject to discipline.

WHEREFORE, based on the foregoing, Crusen should be fined \$5,000.

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 Crusen & Klein, Inc. d/b/a Crusen's II and with the proposed discipline of a \$5,000 FINE.

Crusen & Klein, Inc. d/b/a Crusen's II 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-22-09 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 Crusen 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