

**STATE OF ILLINOIS
ILLINOIS GAMING BOARD**

IN RE THE DISCIPLINARY ACTION OF:

**KKG4 Inc. d/b/a KKG4 Inc. &
KKG4 Inc. d/b/a Harrisburg 66**

**Licensed Establishments
License Nos. 200702987 & 210701104**

DC-V-23-216

**COMPLAINT FOR PROPOSED DISCIPLINARY ACTION
AND NOTICE OF SUMMARY SUSPENSION**

The Illinois Gaming Board, for its Complaint against KKG4 Inc. d/b/a KKG4 Inc. and KKG4 Inc. d/b/a Harrisburg 66 states as follows:

NATURE OF ACTION

1. The Illinois Gaming Board (the “Board” or “IGB”) brings this action against licensed video gaming Establishments KKG4 Inc. d/b/a KKG4 Inc. and KKG4 Inc. d/b/a Harrisburg 66 (collectively “KKG4”) for noncompliance with Illinois law by repeatedly failing to remit amounts due to the State of Illinois in violation of the Video Gaming Act (“the “VGA”) and the Board’s Adopted Rules for Video Gaming (the “Rules”).

2. KKG4’s conduct violates provisions of the 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 Illinois law.

3. The Board brings this action pursuant to Sections 78(a)(2), 78(a)(3) and 80 of the VGA; Sections 5(b)(2), 5(b)(13), 5(c)(5), and Section 17 of the Illinois Gambling Act (the “IGA”); and Sections 1800.310 of the Rules. 230 ILCS 40/78; 230 ILCS 40/80; 230 ILCS 10/5; 230 ILCS 10/17; 11 Ill. Adm. Code 1800.310.

4. Through this action, the Board seeks to revoke KKG4's Video Gaming Establishment Licenses.

5. Additionally, per Section 17 of the IGA, KKG4's Video Gaming Establishment Licenses are summarily suspended pending a final Board order in this matter.

PARTIES AND RELEVANT ENTITIES

6. 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.

7. KKG4 Inc. d/b/a KKG4 Inc. is a licensed Video Gaming Establishment (License No. 200702987) and was first licensed by the Board on December 8, 2021. KKG4 Inc. d/b/a Phillips 66 is a licensed Establishment (License No. 210701104) and was first licensed by the Board on November 18, 2021. KKG4, its employees, and its agents are required to comply with the VGA and the Rules at all times.

8. KKG4 Inc. d/b/a KKG4 Inc. is located at 1117 East 5th Street in Metropolis, Illinois.

9. KKG4 Inc. d/b/a Phillips 66 is located at 614 South Commercial Street in Harriburg, Illinois.

10. Jitender Singh ("Singh") owns KKG4.

11. Roger Multani ("Multani") is KKG4's Video Gaming Manager.

RELEVANT FACTUAL BACKGROUND

12. On September 20, 2023, the Illinois Attorney General's Office filed criminal indictments in Peoria and Sangamon Counties, Illinois charging Singh with the following felony offenses:

- a. One count of theft of property over \$1 million;
- b. 15 counts of theft of government property over \$100,000;
- c. Three counts of theft of government property over \$100,000;
- d. Eight counts of sales tax evasion over \$100,000;
- e. Three counts of sales tax evasion between \$10,000 and \$100,000; and
- f. One count of wire fraud.

13. On September 20, 2023, the Illinois Attorney General's Office filed criminal indictments in Peoria and Sangamon Counties, Illinois charging Multani with the following felony offenses:

- a. One count of theft of property over \$1 million;
- b. 14 counts of theft of government property over \$100,000;
- c. Three counts of theft of government property over \$100,000;
- d. Eight counts of sales tax evasion over \$100,000;
- e. Three counts of sales tax evasion between \$10,000 and \$100,000; and
- f. One count of wire fraud.

14. According to the charges, between January 1, 2019 and July 20, 2022, Singh and Multani collected millions of dollars of taxable revenue and failed to remit the appropriate sales tax to the State of Illinois, which produced more than \$4 million in tax liability.

15. Singh and Multani are alleged to have underreported millions of dollars in sales, thereby defrauding the State of Illinois of millions of dollars in tax revenue.

COUNT I
Theft in Violation of Rule 310(a)(1)

16. The Board re-alleges and incorporates Paragraphs 1 through 15 above as if fully alleged herein.

17. Board Rule 310 subjects a licensee to discipline for the acts of its employees and agents.

18. Board Rule 310(a)(1) provides that a licensee may be subject to discipline for any violation of Board Rules and for failing to comply with or make provision for compliance with the Act, IGB Rules, or any federal, state or local law or regulation. 11 Ill. Adm. Code 1800.310(a)(1).

19. As its owner, Singh is an agent of KKG4.

20. As its Video Gaming Manager, Multani is an agent of KKG4.

21. By failing to remit collected sales tax to the State of Illinois, Singh committed theft, sales tax evasion and wire fraud.

22. By failing to remit collected sales tax to the State of Illinois, Multani committed theft, sales tax evasion and wire fraud.

23. Theft, sales tax evasion and wire fraud are violations of Illinois law.

24. By engaging in theft, sales tax evasion and wire fraud, Singh and Multani violated Rule 1800.310(a)(1).

WHEREFORE, based on the foregoing, KKG4's Video Gaming Establishment Licenses should be revoked. Additionally, per Section 17 of the IGA, KKG4's Video Gaming Establishment Licenses are summarily suspended pending a final Board order.

COUNT II
Repeated Failure to Remit Taxes in Violation of Rule 310(a)(12)

25. The Board re-alleges and incorporates Paragraphs 1 through 15 above as if fully alleged herein.

26. Board Rule 310 subjects a licensee to discipline for the acts of its employees and agents.

27. Board Rule 310(a)(12) provides that a licensee is subject to discipline for willfully or repeatedly failing to pay amounts due or to be remitted to the State of Illinois. 11 Ill. Adm. Code 1800.310(a)(12).

28. As its owner, Singh is an agent of KKG4.

29. As its Video Gaming Manager, Multani is an agent of KKG4.

30. By failing to repeatedly remit collected sales tax to the State of Illinois, Singh and Multani violated Rule 310(a)(12).

WHEREFORE, based on the foregoing, KKG4's Video Gaming Establishment Licenses should be revoked. Additionally, per Section 17 of the IGA, KKG4's Video Gaming Establishment Licenses are summarily suspended pending a final Board order.

COUNT III

Failure to Timely Remit Taxes in Violation of Rule 310(a)(13)

31. The Board re-alleges and incorporates Paragraphs 1 through 15 above as if fully alleged herein.

32. Board Rule 310 subjects a licensee to discipline for the acts of its employees and agents.

33. Board Rule 310(a)(13) provides that a licensee may be subject to discipline for failing to timely pay amounts due or to be remitted to the State of Illinois. 11 Ill. Adm. Code 1800.310(a)(13).

34. As its owner, Singh is an agent of KKG4.

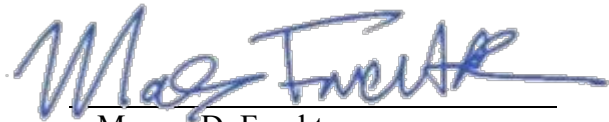
35. As its Video Gaming Manager, Multani is an agent of KKG4.

36. By failing to timely remit collected sales tax to the State of Illinois, Singh and Multani violated Rule 1800.310(a)(13).

WHEREFORE, based on the foregoing, KKG4's Video Gaming Establishment Licenses should be revoked. Additionally, per Section 17 of the IGA, KKG4's Video Gaming Establishment Licenses are summarily suspended pending a final Board order.

Dated: September 27, 2023

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Marcus D. Fruchter", written over a horizontal line.

Marcus D. Fruchter
Administrator
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 KKG4 Inc. d/b/a KKG4 Inc. and KKG4 Inc. d/b/a Harrisburg 66 (collectively “KKG4”) to revoke KKG4’s Video Gaming Establishment Licenses.

If KKG4 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 KKG4 files an Answer that complies with all requirements under Rule 720, a hearing officer will be appointed to conduct a hearing. The Answer shall be submitted to:

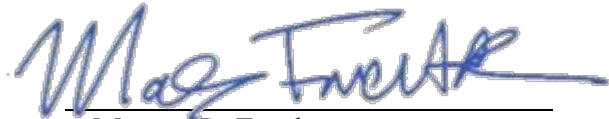
IGB.LEGAL@illinois.gov

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

Failure to file an Answer within 21 days of receiving this Complaint will result in the proposed disciplinary action becoming effective and final.

Per Section 17 of the IGA, KKG4’s Video Gaming Establishment Licenses are summarily suspended pending a final Board order.

Dated: September 27, 2023



Marcus D. Fruchter
Administrator
Illinois Gaming Board