

**STATE OF ILLINOIS
ILLINOIS GAMING BOARD**

IN RE THE DISCIPLINARY ACTION OF:

PATRICIA LYNN GAFFNEY

**Licensed Terminal Handler
License No. 210501123**

DC-V-23-34

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

The Illinois Gaming Board, for its Complaint against Patricia Lynn Gaffney, states as follows:

NATURE OF ACTION

1. The Illinois Gaming Board (the “Board” or “IGB”) brings this action against licensed terminal handler Patricia Lynn Gaffney (“Gaffney”) for her association with an individual alleged to have committed felony theft from a Board licensee in violation of the Video Gaming Act (the “VGA”) and the Board’s Adopted Rules for Video Gaming (the “Rules”).
2. Gaffney’s conduct violates, among other things, 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 maintaining an association that adversely affects public confidence and trust in gaming or poses a threat to the public interests of the State or to the security and integrity of video gaming.
3. The Board brings this action pursuant to Sections 78 and 80 of the VGA; Sections 5(b)(2), 5(b)(13), and 5(c)(5) of the IGA; and Sections 1800.210, 1800.310, and 1800.420 of the Rules. 230 ILCS 40/78; 230 ILCS 40/80; 230 ILCS 10/5; 230 ILCS 10/9; 11 Ill. Adm. Code 1800.210; 11 Ill. Adm. Code 1800.310; 11 Ill. Adm. Code 1800.420.

4. Through this action, the Board seeks to REVOKE Gaffney's license. Additionally, per Section 17 of the Illinois Gambling Act, Gaffney's terminal handler license is summarily suspended pending a final Board order

PARTIES

5. Gaffney is a licensed terminal handler (License No. 210501123), and at all relevant times was employed by Accel Entertainment Gaming, LLC ("Accel"). As a Board licensee, Gaffney is obligated to comply with the VGA and Rules at all times.

6. Accel is a licensed terminal operator (License No. 100600345).

7. 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.

COUNT I

Association with Individual Who Poses a Threat to Gaming

8. In July 2022, Accel noticed that currency cannisters from a VGT at a specific location were being recovered with less currency that records indicate should have been in the cannisters.

9. Surveillance from the location establishes that on at least five separate days, two male individuals appear at the location, access the inside of the VGT using keys specifically designed to access the VGT, and remove and replace the currency cannisters.

10. Accel referred the matter to Lansing Police.

11. On August 31, 2022, Lansing Police arrested Jim Shuman ("Shuman") for his involvement in accessing the VGT and removing and replacing currency cannisters.

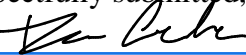
12. On or around September 1, 2022, Shuman was charged with Felony Theft for his involvement in accessing the VGT and removing and replacing currency cannisters.
13. Shuman is Gaffney's boyfriend.
14. Shuman and Gaffney reside in the same residence.
15. Only a licensed technician may service, maintain, or repair a VGT unless that person is an employee of a terminal operator, a distributor, or a manufacturer.
16. Only a licensed terminal handler may possess or control a VGT, or access its inner workings.
17. Shuman does not hold a video gaming license issued by the Board.
18. Shuman has never held a video gaming license issued by the Board.
19. Shuman has never applied for a video gaming license issued by the Board.
20. Shuman is not an employee of a distributor or a manufacturer.
21. An individual is not qualified for licensure if that person maintains an association that poses a threat to the security and integrity of video gaming.
22. An individual is not qualified for licensure if that person maintains an association that discredits the Illinois gaming industry.
23. By illegally accessing or assisting in the illegal access of the inner workings of a VGT, Shuman poses a threat to the security and integrity of video gaming.
24. By illegally accessing or assisting in the illegal access of the inner workings of a VGT, Shuman discredits the Illinois gaming industry.
25. By engaging in theft from Accel, a Board licensee, Shuman poses a threat to the security and integrity of video gaming.

26. By engaging in theft from Accel, a Board licensee, Shuman discredits the Illinois gaming industry.
27. Through Shuman's status as Gaffney's boyfriend, Gaffney associates with Shuman.
28. By sharing a residence with him, Gaffney associates with Shuman
29. Gaffney's association with Shuman poses a threat to the security and integrity of video gaming.
30. Gaffney's association with Shuman discredits the Illinois gaming industry.
31. A licensee is subject to discipline for failing to comply with any Board rule.
32. A licensee is subject to discipline for any cause which, had the Board known, would have disqualified the licensee from licensure.
33. By maintaining an association that poses a threat to the security and integrity of video gaming, Gaffney fails to comply with Board Rule 420.
34. By maintaining an association that poses a threat to the security and integrity of video gaming, Gaffney is disqualified from licensure.
35. By maintaining an association that discredits the Illinois gaming industry, Gaffney fails to comply with Board Rule 420.
36. By maintaining an association that discredits the Illinois gaming industry, Gaffney is disqualified from licensure.
37. By engaging in the conduct described above, Gaffney is subject to discipline pursuant to Rule 310.

WHEREFORE, based on the foregoing, Gaffney's terminal handler license should be revoked. **Per Section 17 of the Illinois Gambling Act, Gaffney's license is summarily suspended pending a final Board order.**

Dated: March 10, 2023

Respectfully submitted,


Daniel Gerber (Mar 10, 2023 14:32 CST)

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 Patricia Lynn Gaffney seeking revocation of her license. Pursuant to Section 17 of the Illinois Gambling Act, Patricia Lynn Gaffney license is SUMMARILY SUSPENDED 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

Date: March 10, 2023



Daniel Gerber (Mar 10, 2023 14:32 CST)

Daniel Gerber
General Counsel
Illinois Gaming Board