STATE OF ILLINOIS ILLINOIS GAMING BOARD

IN RE THE DISCIPLINARY ACTION OF:

Huddle Cafe, LLC d/b/a Huddle Café, LLC DC-V-23-133

Licensed Establishment License No. 200702104

AMENDED COMPLAINT FOR PROPOSED DISCIPLINARY ACTION

The Illinois Gaming Board, for its Complaint against Huddle Cafe, LLC d/b/a Huddle Café, LLC, states as follows:

NATURE OF ACTION

- 1. The Illinois Gaming Board (the "Board" or "IGB") brings this action against licensed establishment Huddle Cafe, LLC d/b/a Huddle Café, LLC ("Huddle Cafe") for failing to disclose a change of its ownership.
- 2. Huddle Cafe's conduct violates provisions of the Video Gaming Act (the "VGA") and the Bord's Adopted Rules for Video Gaming (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 being convicted for a crime involving dishonesty or moral turpitude.
- 3. The Board brings this action pursuant to Sections 55, 78(a)(2), 78(a)(3) and 80 of the VGA; Sections 5(b)(2), 5(b)(13), and 5(c)(5) of the Illinois Gambling Act; and Sections 1800.220 and 1800.310 of the Rules. 230 ILCS 40/55; 230 ILCS 40/78; 230 ILCS 40/80; 230 ILCS 10/5; 11 Ill. Adm. Code 1800.220; 11 Ill. Adm. Code 1800.310.
- 4. Through this action, the Board seeks to fine Huddle Cafe's establishment license.

PARTIES AND RELEVANT FACTUAL BACKGROUND

- 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 Huddle Cafe is a licensed establishment (License No. 200702104) and was first licensed by the Board on January 27, 2021. As a licensee, Huddle Cafe, its employees, and its agents are required to comply with the VGA and the Rules at all times.
- 7. Huddle Cafe operates in Ashton, Illinois.
- 8. From January 27, 2021 through at least December 20, 2022, Adelina Mimini ("Adelina") owned 50% of Huddle Café and was a manager of the LLC.
- 9. On December 6, 2022, the Rochelle Police Department arrested Adelina for retail theft.
- On December 21, 2022, Huddle Café filed Articles of Amendment with the Illinois
 Secretary of State to withdraw Adelina as its LLC manager.
- 11. On or around December 21, 2022, Adelina transferred her ownership in Huddle Café.
- 12. Huddle Café did not disclose either the Articles of Amendment or the change of ownership until March 23, 2023.

COUNT I Disqualification from Licensure In Violation of 11. Ill. Adm. Code 1800.220

- 13. The Board re-alleges and incorporates Paragraphs 1 through 12 above as if fully alleged herein.
- 14. Rule 310(a)(1) subjects a licensee to discipline for any violation of a Board Rule.
- 15. Rule 220 obligates a licensee to disclose "any changes or additions to all material information provided in an application for a video gaming license" within 21 days.

- 16. The identity of its LLC managers is material information provided on Huddle Café's video gaming license application.
- 17. Its ownership is material information provided on Huddle Café's video gaming license application.
- 18. Despite its obligation to do so, Huddle Café failed to notify the Board of the material changes to its application within 21 days.
- 19. By engaging in the conduct described above, Huddle Cafe is subject to discipline pursuant to 11 Ill. Adm. Code 1800.310.

WHEREFORE, based on the foregoing, Huddle Cafe's licensed establishment license should be FINED.

Respectfully submitted,

Dated: April 13, 2023

Daniel Gerber (Apr 13, 2023 22:44 CDT)

Dan 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 Maya Gaming LLC and to propose the following discipline:

The video gaming location license of Huddle Cafe LLC (License No. 200702104) shall be fined \$1,000 for violations of the Board's Adopted Rules, as set forth in Disciplinary Complaint No. DC-V-23-133 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 OR Revenue Accounting Unit 801 South Seventh Street, Suite 400 - South Springfield, Illinois 62703 Made Electronically By Clicking Here

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, Illinois 60601 OR IGB.LEGAL@illinois.gov

Date: April 13, 2023

Daniel Gerber (Apr 13, 2023 22:44 CDT)

Dan Gerber General Counsel Illinois Gaming Board