STATE OF ILLINOIS ILLINOIS GAMING BOARD

IN RE THE DISCIPLINARY ACTION OF:

DYLAN LELAND JACKSON

DC-V-23-134

Licensed Terminal Handler License No. 210501614

COMPLAINT FOR DISCIPLINARY ACTION AND NOTICE OF SUMMARY SUSPENSION

The Illinois Gaming Board, for its Complaint against Dylan Leland Jackson, states as follows:

NATURE OF ACTION

- 1. The Illinois Gaming Board (the "Board" or "IGB") brings this action against licensed terminal handler Dylan Lee Jackson ("Jackson") for his theft from video gaming redemption kiosks in violation of the Video Gaming Act (the "VGA") and the Board's Adopted Rules for Video Gaming (the "Rules").
- 2. Jackson'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.
- 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 and 1800.310 the Rules. 230 ILCS 40/78; 230 ILCS 40/80; 230 ILCS 10/5; 230 ILCS 10/9; 11 III. Adm. Code 1800.210; 11 III. Adm. Code 1800.310.
- 4. Through this action, the Board seeks to REVOKE Jackson's license. Additionally, per Section 17 of the Illinois Gambling Act, Jackson's terminal handler license is summarily suspended pending a final Board order.

PARTIES

- 5. Jackson is a licensed Terminal Handler (License No. 210501614), and at all relevant times was employed by Accel Entertainment Gaming LLC ("Accel"). As a Board licensee, Jackson 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 – THEFT IN VIOLATION OF RULE 210

- 8. On March 24, 2023, Accel informed IGB Gaming Agents that Accel believed Jackson stole cash from several licensed locations totaling in excess of \$32,000. Accel formed this belief after noticing a pattern of money missing from redemption kiosks that Jackson serviced at the licensed locations.
- 9. On or about March 24, 2023, Jackson was interviewed by Accel security personnel.
- 10. During the interview, Jackson admitted to keeping for his personal use at least \$32,000 that he removed from redemption kiosks at several licensed locations.
- 11. The money inside the redemption kiosks belonged to Accel. Nonetheless, Jackson knowingly obtained unauthorized control of the money.
- 12. Rule 210 subjects licensees to Board discipline for any act or failure to act that is injurious to the safety, morals, good order and general welfare of the people of the State, or that would discredit or tend to discredit the State or its video gaming industry.

13. Rule 310 subjects licensees to Board discipline for any failure to comply with any State

law or Board rule.

14. By stealing from Accel, Jackson engaged in activity that is injurious to the good order and

general welfare of the people of the State.

15. By stealing from Accel, Jackson engaged in behavior that discredits the State's gaming

industry.

16. By stealing from Accel, Jackson violated the Criminal Code of 2012.

17. By engaging in the conduct described above, Jackson is subject to discipline under Rule

310.

WHEREFORE, based on the foregoing, Jackson's licensed should be REVOKED. . Per

Section 17 of the Illinois Gambling Act, Jackson's license is summarily suspended pending

a final Board order.

Dated: March 28, 2023

Respectfully submitted,

Daniel Gerber (Mar 28, 2023 17:01 CDT)

Daniel Gerber General Counsel

Illinois Gaming Board

ISSUED UNDER THE AUTHORITY OF THE ADMINISTRATOR OF

THE ILLINOIS GAMING BOARD

3

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 DYLAN LELAND JACKSON and to seeking to revoke Jackson's license. Pursuant to Section 17 of the Illinois Gambling Act, Jackson's 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. The Answer should be mailed to:

OR

Illinois Gaming Board Attn: Legal Department 160 N. LaSalle St., Suite 300 Chicago, Illinois 60601 IGB.LEGAL@illinois.gov

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

Dated: March 28, 2023

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Daniel Gerber General Counsel Illinois Gaming Board