

**HEARING BEFORE A PANEL  
OF THE BOARD OF  
ALBERTA GAMING, LIQUOR AND CANNABIS COMMISSION**

**IN THE MATTER OF the *Gaming, Liquor and Cannabis Act*  
Revised Statutes of Alberta 2000, Chapter G-1, as amended  
and the Regulation**

**and**

**Deerfoot Inn & Casino Inc.  
o/a Deerfoot Inn & Casino (Applicant)  
1000 – 11500 35 Street SE  
4th Floor, 10226 - 104th Street  
Calgary, AB T2Z 3W4**

<b>DATE OF HEARING:</b>	<b>November 28, 2023</b>
<b>HEARING PANEL:</b>	<b>Patti Grier, Presiding Member Vincent Vavrek, Panel Member Tongjie Zhang, Panel Member</b>
<b>APPLICANTS / REPRESENTATIVE:</b>	<b>Shannon Charland, Casino General Manager Landon Lacroix, Poker Manager</b>
<b>REGULATORY SERVICES DIVISION:</b>	<b>Todd Stearns, Hearing Officer Petrina Nash, Resource Officer</b>

**DECISION OF THE HEARING PANEL**

The Panel finds that Deerfoot Inn & Casino (Applicants/Licensee) contravened sections 4.4.4(a), 4.4.4(c) and 6.4.2(a) of the Casino Terms & Conditions and Operating Guidelines (the CTCOG). The Panel finds that the Licensee did not take all reasonable steps to prevent its employee from contravening these provisions, in accordance with section 121 of the *Gaming, Liquor and Cannabis Act* (the Act).

In accordance with section 94(7)(a) of the Act, the Panel confirms the administrative sanctions imposed by the Regulatory Services Division (Regulatory Services) for fines totaling \$1,000.

The fines are to be paid on or before January 17, 2024.

## I. Jurisdiction and Preliminary Matters

[1] By letter dated August 28, 2023 the Regulatory Services Division of Alberta Gaming, Liquor and Cannabis Commission (AGLC) advised Deerfoot Inn & Casino Inc., operating as Deerfoot Inn & Casino, (the Licensee) that the Licensee contravened:

- section 4.4.4(a) of the CTCOG: a casino facility licensee is responsible for ensuring the licensed casino facility is operated and maintained in accordance with the *Gaming, Liquor and Cannabis Act*, Gaming, Liquor and Cannabis Regulation and all Board policies including those detailed in this handbook;
- section 4.4.4(c) of the CTCOG: a casino facility licensee is responsible for ensuring that registered gaming workers conduct all games in accordance with the casino facility licensee's rules of play and Section 9 of the CTCOG; and
- section 6.4.2(a) of the CTCOG: All registered gaming workers assigned to supervision or oversight positions and are identified in CasinoTrack as a pit boss, pit supervisor, or games manager of table operations are the only positions that can resolve a table irregularity.

[2] For the alleged contraventions of sections 4.4.4(a) and 6.4.2 of the CTCOG, Regulatory Services imposed an administrative sanction of a fine of \$500.

[3] For the alleged contravention of section 4.4.4(c) of the CTCOG, Regulatory Services imposed an administrative sanction of a fine of \$500.

[4] The Licensee subsequently applied for a hearing before a Panel of the Board of AGLC pursuant to section 94(1) of the Act.

[5] In accordance with section 11 of the Act, the Board Chair designated three members of the Board to sit as a Panel to conduct the hearing and make a decision – Patti Grier (Presiding Member), Vincent Vavrek, and Tongjie Zhang.

[6] The parties and the Hearing Panel were provided with a record containing various documents pertaining to the issues before the panel. The Applicants confirmed receipt of the Notice of Hearing dated October 4, 2023 and the attached hearing record. The following documents were entered into evidence:

- Exhibit 1 Hearing Record, including Tabs 1 to 3
- Exhibit 2 Video surveillance provided by Regulatory Services
- Exhibit 3 Video surveillance and additional documents provided by the Licensee, including pages 1 to 12

## II. Issues

[7] Did the Licensee contravene sections 4.4.4(a) and/or 4.4.4(c) and/or 6.4.2 of the CTCOG?

[8] If the Licensee contravened sections 4.4.4(a) and/or 6.4.2 of the CTCOG, should the administrative sanction imposed by Regulatory Services of a \$500 fine be confirmed, replaced, or cancelled?

[9] If the Licensee contravened section 4.4.4(c) of the CTCOG, should the administrative sanction imposed by Regulatory Services of a \$500 fine be confirmed, replaced, or cancelled?

[10] Further, if the Licensee contravened any or all of the above, is there evidence that the Licensee took all reasonable steps to prevent its employee or agent from contravening the provision in accordance with section 121 of the Act?

### **III. Regulatory Services Submissions**

[11] Regulatory Services called two witnesses to give evidence: Inspectors Peter Snowdon and Ray Wen.

[12] Inspector Snowdon has been an AGLC Inspector for sixteen years, with nine years as a gaming Inspector. Inspector Snowdon has never worked in a casino but is familiar with the CTCOG, and casino policies and rules of play.

[13] Inspector Wen has been a gaming Inspector for two years.

[14] The following is a summary of the evidence provided by Inspectors Snowdon and Wen.

[15] On May 7, 2023, Inspector Snowdon received a complaint from an individual who had participated in a game, known as Bomb Pot, on May 6, 2023 at Deerfoot Inn & Casino.

[16] Inspector Snowdon explained to the Panel that Bomb Pot is a variation of a poker game. Inspector Snowdon advised the Panel that Deerfoot Inn & Casino does not allow Bomb Pot nor does it have the required AGLC approval to conduct them. He is not aware of any Alberta casino facility licensees that are approved to conduct Bomb Pot.

[17] Inspector Snowdon explained that casino facility licensees require approval from AGLC for certain table games or variations offered at their facility. As part of the approval process, the licensee is required to submit rules of play for the games or variations they conduct. Different casinos offer different approved games or variations, and Inspector Snowdon estimated that the approval process takes about two weeks.

[18] Once a game is approved, the dealers are trained on the rules of play and all Registered Gaming Workers in the casino are responsible for becoming familiar with the rules of play for games offered.

[19] Inspector Snowdon stated that if a casino facility licensee conducts an unapproved game, they are putting themselves, the players and the integrity of gaming at risk as there are no rules or procedures for how the game should be conducted or how to resolve issues that might arise.

[20] As a result of the complaint, Inspector Snowdon initiated an investigation. He advised the Panel that public complaints are a top priority for him as he has been entrusted, as an AGLC Inspector, to ensure that the integrity of gaming in Alberta is upheld and to maintain the public perception of that.

[21] On May 8, 2023, Inspector Snowdon received an email (Exhibit 1, Tab 2, Attachment 1) from the Deerfoot Inn & Casino Table Games Manager, W , advising him of the same May 6, 2023 incident. The following information was provided by Mr. W :

- A variation of Pot Limit Omaha known as “Bomb Pot” had been played in the poker room without the knowledge of the Houseman.
- A dispute broke out at the table because of a dealer error.
- The Lead Houseman, B , attended the table and made a decision on the hand for a game he was “not used to making a call on.”
- Mr. B was confused about what the players (and the dealer) were doing, since it was not an approved game for them to be playing.
- A review of the incident by casino management the next day determined that Mr. B “could have potentially made a better call by simply voiding the hand and returning the players’ money.”
- The dealer involved in the incident had previously given the casino two weeks’ notice of his resignation.
- The dealer was terminated on May 7, 2023 for conducting an unapproved game.

[22] As part of his investigation, Inspector Snowdon obtained video surveillance footage (Exhibit 2) and copies of the Discrepancy Reports completed by Mr. B and Mr. W (Exhibit 1, Tab 2, Attachments 2 and 3). Inspectors Snowdon and Wen also met with Housemen W and Mr. B regarding the incident. Through the investigation, Inspector Snowdon submitted that he determined the following:

- Mrs. W attended the table in question and became aware of a dispute resulting from a dealer error but was advised by an onlooker that the dispute was resolved. Mrs. W stated that she did not stop the play nor investigate the table irregularity as she believed the game in play was an approved game, known as Run It Twice.
- Mr. B arrived at the table shortly after Mrs. W , so she left the table.
- Mr. B had attended the same table earlier concerning a separate issue. He left to call surveillance to address it and when he returned, the table had moved onto a new game, later determined to be Bomb Pot.
- Mr. B was confused when he got to the table as he did not recognize the game in play, but he did not stop the play.
- Mr. B realized only after the hand was complete that Bomb Pot had been played. He advised the table that Deerfoot Inn & Casino does not allow Bomb Pot and instructed them not to continue.
- Mr. W was called to speak with a dissatisfied player after the incident who felt Deerfoot Inn & Casino was liable for his loss as it was “illegal” for the casino to be running Bomb Pot.
- In his discrepancy report, Mr. B acknowledged he should have “killed the hand” as soon as he reached the table and determined how to divide the pot.

[23] Inspector Snowden suggested it would have been possible to stop the game and return the funds to the players but that did not occur.

[24] Regarding Mrs. W's reference in her interview to believing the game being played was "Run It Twice," Inspector Snowden advised the Panel that Run It Twice is "head-to-head" showdown between two players who have placed an "all in" bet. Deerfoot Inn & Casino has AGLC approval to conduct Run It Twice games.

[25] During the hearing, Inspector Wen walked through the video surveillance footage. He explained that the game being played could not have been Run It Twice because more than one player had a hand in the final round (i.e., it was not head-to-head). He pointed out in the overhead footage of the hand in play when Mrs. W and Mr. B attended the table that four players were active. Inspector Wen, when questioned by the Applicants, agreed that it was easier to conclude that the game being played was not Run It Twice after reviewing the video footage.

[26] Inspector Snowden explained that the complainant who called him on May 7, 2023 was the dissatisfied player that spoke with Mr. W after the incident. The complainant asserted that a hand of Bomb Pot had been dealt incorrectly and then resolved by the players and the dealer at the table. The complainant stated that he lost approximately \$12,000 as a result.

[27] Inspector Snowden stated that he has received very few complaints regarding table games and has never received a complaint regarding an unapproved game being conducted. He confirmed that it is not normal practice for players and a dealer to enter a game without any predetermined rules.

[28] Inspector Snowden believed that the dealer at the table did not call for a supervisor, known as a Houseman, when the issue arose because the dealer was aware the Bomb Pot was not an approved game.

[29] Inspector Wen asserted that AGLC policies do not allow players and dealers to settle a dispute amongst themselves, only supervisors are permitted to do so. As such, Inspector Snowden confirmed that as part of the investigation, he interviewed the dealer and took disciplinary action.

[30] Inspector Snowden advised the Panel that Mrs. W and Mr. B are registered gaming workers but also, by virtue of their roles as Houseman and Lead Houseman, they are designated games managers. To become a designated games manager, a registered gaming worker requires a score of 75 per cent or more on an AGLC examination that tests for significant gaming knowledge. Inspector Snowden asserted that Mrs. W and Mr. B possess significant gaming knowledge required to understand and resolve any disputes related to table games. He added that the Housemen are responsible for the activities within the poker room.

[31] When asked by the Applicants whether the incident had resulted in an impact to the casino's charitable gaming proceeds, Inspector Snowden confirmed that there was no impact. He also confirmed that he discussed with Mr. W that the players at the table decided to participate in an unapproved

game, using their own money, without the casino knowing and that it is also the players' responsibility to understand the games they are playing.

#### IV. Deerfoot Inn & Casino Submissions

[32] The Applicants, Shannon Charland and Landon Lacroix, provided an overview of the video surveillance footage (Exhibits 2 and 3) and called three witnesses to give evidence on behalf of Deerfoot Inn & Casino:

- W , Houseman
- B , Lead Houseman
- W , Table Games Manager

#### Surveillance video footage

[33] Deerfoot Inn & Casino submitted that, upon review of the surveillance footage, the point of dispute is evidenced by players gesturing and the dealer hesitating. The Applicants pointed out that a player can be seen quieting the table so as not to alert the Houseman to the issue and Mr. Lacroix suggested that if the dealer was following protocol, they would have called the Houseman at that point.

[34] Later in the footage, Mrs. W can be seen speaking with an onlooker and then briefly exchanging a few words with Mr. B as he arrives at the table. She appears to pass the issue on to Mr. B and turns to leave the table.

[35] Mr. B is seen positioning himself behind the dealer and alerts the dealer of his presence. The dealer reveals a card and deals a final card. The Applicants illustrated using the timestamps on the video footage from the time Mr. B positioned himself behind the dealer and the final card was dealt, 13 seconds had elapsed.

[36] Although the player that lost the hand, later identified as the complainant, can be seen in the video expressing his frustration to Mr. B , Deerfoot Inn & Casino submitted that the same player is later seen in the footage smiling and laughing.

[37] The video footage showed Mrs. W returning to the table approximately two minutes later and loudly addressing the table and Mr. W can later be seen on the footage speaking with the dissatisfied player.

#### Witnesses

[38] Mrs. W has worked in gaming off and on for 25 years and, specifically, in poker for approximately ten years. Mr. B has been a poker player for 24 years and a Houseman for a number of years. Mr. W has over 16 years' experience in the gaming industry. The following is a summary of the evidence provided by Mrs. W , Mr. B and Mr. W .

[39] Mrs. W confirmed that she was confused when she arrived at the table and that she thought the table was playing "Running It Twice." She confirmed that an onlooker advised her that there had been a dispute because the dealer was dealing improperly but that the dispute was resolved.

[40] Mrs. W stated that she was aware Mr. B had been dealing with a separate incident that occurred earlier at that table. Once Mr. B arrived back at the table, Mrs. W stated that she felt Mr. B had the "situation" under control so she took her leave. Mrs. W submitted that she was not aware the hand she had witnessed was a different hand than the one Mr. B had been assisting with nor that it was Bomb Pot.

[41] Mrs. W clarified that she had heard of Bomb Pot but that she has never seen it dealt. She advised the Panel that she did not take note of how many players were around the table or how many hands were in while she was at the table as she was just looking at the board.

[42] Mr. B confirmed that he had previously been addressing a player question from that table on a separate hand. He had called upstairs to surveillance to have them review the hand. He returned to the table to update the players that he had not heard back from surveillance yet and briefly updated Mrs. W .

[43] Mr. B submitted that it is not uncommon to see people getting excited or standing around a table and discussing the game, so he was not aware there was an additional issue at the table when he returned to provide an update.

[44] Mr. B confirmed that he only had a clear view of the table for 13 seconds before the players revealed their hands which is when he realized they were not playing Run It Twice and Bomb Pot had been dealt. Mr. B submitted that he has seen Bomb Pot dealt in private games but never in a casino.

[45] Upon realizing, Mr. B advised the table that Deerfoot Inn & Casino does not allow Bomb Pot and instructed them not to continue. The player that lost the hand spoke with Mr. B and advised him that the dealer made an error. Mr. B advised the dissatisfied player that there was nothing he could do as the dispute had been resolved amongst the players and the dealer and the winnings had already been paid out.

[46] Mrs. W advised the Panel that when she is seen loudly addressing the players at the table later in the video footage, she was telling the players Deerfoot Inn & Casino does not allow Bomb Pot and if she saw more than five hands in again, everyone at that table would be "out."

[47] When asked by Regulatory Services, Mrs. W and Mr. B each confirmed that as a Housemen it is their duty and responsibility to monitor and supervise the games room. They both agreed that they can delay or stop a game at any time but reiterated that they need time to assess what is occurring at the table before doing so.

[48] Mr. B stated that he has never stopped a table game nor has he seen any other Houseman stop a game.

[49] Mrs. W stated that if she was aware it was Bomb Pot being played, she would have stopped the game.

[50] Following the incident, Mr. W was also called to speak with the dissatisfied player who felt Deerfoot Inn & Casino was liable for his loss. Mr. W stated that he told the player that Mr. B's decision would stand, and he disagreed with the player that Mr. B should have done something differently.

[51] Mr. W told the player that since they decided to use their own funds, not charitable gaming or casino proceeds, to participate in an unapproved game, Deerfoot Inn & Casino was not responsible and would not reverse the hand.

[52] Mr. W advised the player that he was not going to ask the other players to give their money back to "figure it out." The dissatisfied player advised Mr. W that they wished to speak with the Poker Manager, so Mr. W encouraged them to contact Mr. Landon Lacroix, Poker Manager, or AGLC directly if they had further concerns.

[53] When asked by the Panel to clarify whether he could have requested the players provide their money back to resolve the issue, as he indicated could be done in his email to Inspector Snowdon (Exhibit 1, Tab 2, Attachment 1), Mr. W clarified that he "maybe" could have done so but it is uncommon and impractical to rebuild a hand to satisfy the player who lost.

[54] Further, Mr. W acknowledged section 10.3.15(c)(iv) of the Casino Operational Best Practices (Exhibit 3) which states that "a misdeal may not be called once substantial action has occurred." He submitted that this factored into his decision to uphold Mr. B's call on the Bomb Pot hand.

[55] Neither Mrs. W nor Mr. B received any discipline from Deerfoot Inn & Casino because of the incident. Mr. W confirmed that both Mrs. W and Mr. B did their best to assess the situation with limited information and despite not having been alerted to any issue by the dealer.

[56] However, Mrs. W and Mr. B stated they were each issued a caution from AGLC on their gaming worker registration for "failure to supervise."

[57] When asked by the Panel whether he would have done anything differently if he were in the situation again, Mr. B stated that there is not much that could be done after a hand is finished and that 13 seconds is not long enough to make a determination. Mr. B asserted that his intention was to reprimand the dealer after the incident.

[58] Mr. B stated that he believes it is unreasonable and unfair that he was reprimanded for the actions of the dealer. As Lead Houseman, Mr. B submitted, he assesses situations and uses his best judgment to resolve table irregularities when identified by a dealer. Mr. B stated that it is uncommon for a Houseman to walk up to a table and immediately stop the play before assessing the



situation. He reiterated that dealers know what they are supposed to be doing and it is their job to notify a supervisor when there is an issue.

[59] When asked what type of ongoing training supervisors receive, Mrs. W advised the Panel that the Poker Manager frequently communicates with the supervisors on any situations to be aware of. They also receive notifications about any new, approved games, how to run them and the associated rules of play.

## **V. Summation**

### **Regulatory Services**

[60] Regulatory Services submits that the Applicants' contention that the Bomb Pot started without the knowledge or authority of the Housemen does not account for what occurred, as the two Housemen assigned to supervise the room attended the table and failed to address the issues that were created during the live hand.

[61] Regulatory Services is of the opinion that the Housemen's failure to act resulted in a game being played that was not listed in the Applicants' rules of play. This is not in accordance with the Casino Operational Best Practices and section 9.18 of the CTCOG, which covers the requirement for the rules of play to be in place prior to operating table games.

[62] Inspector Snowden provided evidence that during his investigation, which included reviewing the video surveillance that was presented at the hearing, it became apparent that there were several opportunities for the Housemen to stop the hand and return the funds back to the players.

[63] Regulatory Services is of the opinion that there were a few points of failure that led up to the completion of the hand, including the supervisors' failure to fulfil their duties as required by the policy. Because of these failures, the Housemen did not settle the dispute that was occurring on the table; instead, they permitted the dealer and the players to settle it, which is a direct violation of section 6.4.2(a) of the CTCOG.

[64] Regulatory Services submits that the Applicants claimed that these activities were permitted and that rules of play were in place to address what happens when a double board is present; however, there are very specific conditions and rules that must be in place to permit the occurrence of a double board.

[65] Regulatory Services is of the opinion, as explained by Inspectors Snowden and Wen, that the following indicators could have alerted the Housemen to a potential problem:

- Under the terms for Run It Twice, the players must be "heads up."
- There were eight players at the time the double board appeared that were in other end games.
- Run It Twice requires that no actions occur after the agreement is made. When the second board was present, Regulatory Services takes the position the players continued to wager.
- The double board is supposed to occur from the point the agreement is made, but the double board did not end.

- The dealer dealt both boards simultaneously rather than completing the first board before dealing the double board as is required in Run It Twice

[66] Regulatory Services submits that even if the table was playing Run It Twice, Deerfoot Inn & Casino would have still been in violation of several of their rules of play and in contravention of section 4.4.4(c) of the CTCOG.

[67] Regulatory Services submits that the administrative sanctions resulted from having a dealer who thought it was acceptable to deal the unauthorized game to the players, the failure of the housemen to intervene, and having a games manager allow for the ruling to stand.

[68] For these reasons, Regulatory Services requests that the Panel uphold the original sanction of a \$500 fine for violations one and three and \$500 fine for violation two, for a total of \$1,000 in fines for Deerfoot Inn & Casino.

### **Deerfoot Inn & Casino**

[69] The Applicants, on behalf of Deerfoot Inn & Casino, do not dispute that a Bomb Pot hand occurred and agree that Bomb Pot is unapproved and not to be conducted at Deerfoot Inn & Casino.

[70] Deerfoot Inn & Casino takes the position that the full scope of the incident was not captured in the Incident Report prepared by Regulatory Services. The dealer involved has over 12 years' experience and was aware of the rules and what they are and are not allowed to do. Despite that, the dealer knowingly dealt a game without the knowledge or approval of Deerfoot Inn & Casino or AGLC.

[71] As such, Deerfoot Inn & Casino is of the opinion they are being held accountable for the actions of a "rogue" dealer.

[72] Deerfoot Inn & Casino submits that there was adequate supervision (three Housemen for nine tables) in the poker room when the incident occurred. The poker room is loud, players are animated and unless a Houseman is called by a dealer, they may not be immediately aware of a table irregularity.

[73] Deerfoot Inn & Casino takes the position that the Licensee and its employees follow the CTCOG and their in-house procedures and do their best to uphold the integrity of gaming. However, there is no "rule book" for situations that arise from unapproved games. As such, Deerfoot Inn & Casino asserts that Mrs. W , Mr. B and Mr. W made the best decision with the information they had to deal with the situation.

[74] Deerfoot Inn & Casino submits that a hand cannot be voided after significant action has taken place.

[75] Therefore, Deerfoot Inn & Casino requests not to be held accountable for the actions of the dealer and the players and asks that the Panel cancel the administrative sanctions imposed by Regulatory Services.

## VI. Analysis

[76] The Panel carefully considered the oral and documentary evidence submitted by Regulatory Services and Deerfoot Inn & Casino in making its finding of fact.

[77] The Panel finds that Mrs. W , Mr. B and Mr. W provided evidence that they are experienced and knowledgeable in table games. Although they provided evidence that they had heard of but were not familiar with Bomb Pot, the Panel finds, as explained by Inspector Wen, that there were identifiable factors present during the incident that are unique to Bomb Pot and are not representative of Run It Twice.

[78] Based on the evidence provided by the Inspectors and as seen in the Exhibit 2 video surveillance footage, the Panel finds that that there were four hands left in the game when Mr. B surveyed the table, which is not indicative of a Run It Twice game. Additionally, the players exhibited escalated behaviors when Mrs. W and Mr. B attended the table which, the Panel finds, should have alerted the Deerfoot Inn & Casino staff that there was an irregularity.

[79] The Panel finds that Deerfoot Inn & Casino staff did not intervene or stop the hand when it was apparent that there was confusion and disagreement regarding the game. In doing so, Deerfoot Inn & Casino allowed an unapproved game to be conducted which gave rise to a complaint from a member of the public who questioned the legitimacy of the results and the conduct of the dealer.

[80] Inspector Snowdon provided evidence that public complaints are a top priority for him as he has been entrusted, as an AGLC Inspector, to ensure that the integrity of gaming in Alberta is upheld and to maintain the public perception of that integrity. The Panel finds that public complaints regarding perceived contraventions of policies or best practices must be taken seriously.

[81] Further, the Panel finds that Mr. B , in his discrepancy report (Exhibit 1, Tab 2, Attachment 3) stated “in hindsight, I wish I had killed the hand as soon as I got to the table and figured out how to divide up the pot, which I will do going forward.”

[82] As such, the Panel finds that the Licensee contravened sections 4.4.4(a) and 4.4.4(c) of the CTCOG.

[83] It was agreed among all witnesses that prior to Mrs. W or Mr. B attending the table and prior to winnings being awarded, there had been a disagreement among the players as to how a specific turn was handled. The Panel heard evidence that as the dealer and the players had all agreed to participate in an unapproved Bomb Pot, they satisfied the dispute amongst themselves.

[84] In their respective roles of Houseman, Lead Houseman and Table Games Manager, Mrs. W , Mr. B and Mr. W are assigned supervisory positions and are individuals allowed to resolve a table irregularity. Upon learning of the irregularity that occurred previously, Mr. W stated in an email to Inspector Snowdon (Exhibit 1, Tab 2, Attachment 1) that the Houseman “could have potentially made a better call on the table by simply voiding the hand and ensuring everyone got their money back

for the hand..." However, Mr. W contradicted himself in oral evidence at the hearing that the casino likely would not be able to do that once winnings were awarded.

[85] As such, the Panel finds that the Licensee contravened section 6.4.2(a) of the CTCOG.

[86] The Panel finds that, in accordance with the CTCOG, Registered Gaming Workers assigned to supervision or oversight positions are responsible for ensuring games are conducted in accordance with AGLC policies and the casino facility licensee's rules of play.

[87] Moreover, the casino facility licensee is responsible for the actions of its employees and, unless the casino facility licensee establishes on a balance of probabilities that it took all reasonable steps to prevent its employees from contravening a provision or policy, the Licensee is deemed also to have contravened the provision.

## **VII. Finding**

[88] For the reasons stated above, the Panel finds that Deerfoot Inn & Casino contravened sections 4.4.4(a), 4.4.4(c) and 6.4.2(a) of the CTCOG. The Panel finds that Licensee did not take all reasonable steps to prevent its employee from contravening these provisions.

[89] In accordance with section 94(7)(a) of the Act, the Panel confirms the administrative sanctions imposed by Regulatory Services for fines totaling \$1,000.

[90] The fines are to be paid on or before January 17, 2024.

Signed at Calgary, this 18<sup>th</sup> day of December, 2023

A handwritten signature in black ink, appearing to be 'Patti Grier', written in a cursive style.

Patti Grier, Presiding Member, Hearing Panel