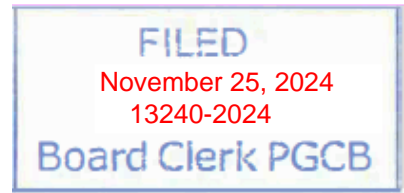


**BEFORE THE  
PENNSYLVANIA GAMING CONTROL BOARD**



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<b>COMMONWEALTH OF PENNSYLVANIA</b>	:	
<b>GAMING CONTROL BOARD</b>	:	
<b>BUREAU OF INVESTIGATIONS AND</b>	:	<b>PETITION FOR</b>
<b>ENFORCEMENT,</b>	:	<b>PLACEMENT ON</b>
<b>Petitioner</b>	:	<b>THE EXCLUSION LIST</b>
	:	
<b>v.</b>	:	<b>INV. ID NOS. 1356-E10203-23</b>
	:	<b>1356-E11189-23</b>
	:	
<b>CHRISTOPHER VINCENT,</b>	:	<b>OHA DKT. NO.</b>
<b>Respondent</b>	:	

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**PETITION FOR PLACEMENT OF CHRISTOPHER VINCENT  
ON THE EXCLUSION LIST**

AND NOW COMES the Petitioner, Commonwealth of Pennsylvania, Gaming Control Board (“Board”), Bureau of Investigations and Enforcement (“BIE”), by and through the Office of Enforcement Counsel (“OEC”), and files this Petition for the Placement of Christopher Vincent (“the Respondent”) on the Exclusion List and in support thereof states the following:

**PARTIES**

1. Petitioner, BIE and the OEC, maintains its headquarters at 303 Walnut Street, Strawberry Square, 10th Floor, Commonwealth Tower, Harrisburg, PA 17101.
2. Sugarhouse HSP Gaming, LP doing business as Rivers Casino Philadelphia (“Rivers”) is the holder of a Category 2 license as approved by the Board.
3. Rivers’ principal place of business is 1001 North Delaware Avenue, Philadelphia, PA 19125.
4. The Respondent’s last known address is 7201 Jackson St., Philadelphia, PA 19135.

5. The Respondent is an African American male who is six (6) foot, two (2) inches tall, with brown eyes and dark hair and a birth date of April 25, 1989.
6. Based upon information received and believed, on June 10, 2022, the Respondent left two (2) minors, approximately 3 and 12 years of age (“Minors 1 and 2”), unattended in a Mitsubishi Outlander (“Outlander”) in the Rivers’ parking lot for approximately nine (9) minutes while he entered the casino to utilize the sportsbook kiosk.<sup>1</sup> Then on September 10, 2022, Respondent returned to Rivers and left two (2) minors, both 14 years of age (“Minors 3 and 4”) unattended in the Outlander in the Rivers parking lot for approximately ten (10) minutes while he entered the casino to utilize the sportsbook kiosk.
7. If the Respondent is placed on the Exclusion List, a physical description of the Respondent, along with the Respondent’s date of birth and a recent photograph will be provided to all slot machine licensees as required by Chapter 511 of the regulations promulgated by the Board (“Regulations”) pursuant to 4 Pa.C.S. §§1101 et seq., known as the Pennsylvania Race Horse Development and Gaming Act (“Act”). 58 Pa. Code § 511a.2.
8. If the Board orders the Respondent to be placed on the exclusion list, the information regarding Respondent’s inimical activity, picture, physical description, date of birth, and other pertinent information will be placed on the Board’s public website along with other excluded individuals.

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<sup>1</sup> All factual information in this Petition pertaining to the incident is based upon information received and believed unless otherwise noted. All times in this Petition are approximate unless otherwise stated.

## **STATEMENT OF JURISDICTION**

9. Section 1517 of the Act grants OEC the authority to initiate, at its sole discretion, non-criminal violation proceedings by filing a pleading with the Board. 4 Pa.C.S. § 1517(a.2)(1)(iii).
10. Chapter 511 of the Regulations requires BIE to “investigate a person to determine whether the person meets the criteria for exclusion [per Act and Regulations].” 58 Pa. Code § 511a.4(a).
11. Upon completion of an investigation, if the BIE determines that an individual should be placed on the exclusion list, it will file a petition for exclusion with the Board, identifying the candidate, setting forth a factual basis for the petition and including information, which demonstrates that the individual satisfies the criteria for exclusion under Section 1514 of the Act or Chapter 511a of the Regulations. 4 Pa.C.S. § 1514; 58 Pa. Code § 511a.4(b).
12. Venue is proper as Chapter 491 of the Regulations states that hearings will be conducted in Harrisburg, Pennsylvania, unless otherwise directed by the Board. 58 Pa. Code § 491a.8(e).

## **RELEVANT STATUTORY AND REGULATORY SECTIONS**

13. The Act and the Regulations mandate that the PGCB establish a list of persons who are to be excluded or ejected from any licensed facility whose presence would be inimical to the interest of the Commonwealth or of licensed gaming therein, 4 Pa. C.S. § 1514; 58 Pa. Code § 511a.3(a)(4)(iv) and (ix). including “persons who pose a threat to the safety of the patrons, employees or persons on the property of a slot machine licensee” and “who have performed an act or have a notorious or unsavory reputation that would

adversely affect public confidence and trust in gaming, including, being identified with criminal activities in published reports of various Federal and State legislative and executive bodies that have inquired into criminal or organized criminal activities.”

14. Pursuant to Chapter 511 of the Regulations, a person’s presence may be considered “inimical to the interest of the Commonwealth or of licensed gaming therein”, or both if known attributes of the person’s character and background meet one of the following criteria:

- a. are incompatible with the maintenance of public confidence and trust in the credibility, integrity, and stability of the operation of a licensed facility;
- b. may reasonably be expected to impair the public perception of, and confidence in, the strict regulatory process created by the Gaming Act; or
- c. creates or enhances a risk of the fact or appearance of unsuitable, unfair or illegal practices, methods or activities in the conduct of gaming or in the business or financial arrangements incidental thereto.

58 Pa. Code § 511a.3(b).

15. Pursuant to Chapter 511 of the Regulations, a finding of inimicality may be based upon:
  - a. the nature and notoriety of the character or background of the person;
  - b. the history and nature of the involvement of the person with licensed gaming in this Commonwealth or another jurisdiction, or with a particular slot machine licensee or licensees or an affiliate, intermediary, subsidiary or holding company thereof;
  - c. the nature and frequency of contacts or associations of the person with a slot machine licensee or licensees, or with employees or agents thereof; or
  - d. other factors reasonably related to the maintenance of public confidence in the efficacy of the regulatory process and the integrity of gaming operations, the gaming industry and its employees.

58 Pa. Code § 511a.3(c).

16. Respondent's race, color, creed, national origin or ancestry and sex is not a reason the OEC seeks to place Respondent's name on the exclusion list. 4 Pa. C.S. § 1514(c); 58 Pa. Code § 511a.3(d).

### **FACTUAL BASIS FOR EXCLUSION**

17. On June 10, 2022, Respondent left Minors 1 and 2 unattended in the Outlander that was parked in the Rivers' parking lot for approximately 9 minutes.
18. At 3:44 p.m., Respondent exited the Outlander and walked towards the casino entrance.
19. At 3:45 p.m., Respondent entered the casino. He then entered the gaming floor and proceeded to a sportsbook kiosk.
20. At 3:52 p.m., Respondent departed the sportsbook kiosk.
21. At 3:53 p.m., Respondent returned to the Outlander and spoke to Rivers' Security.
22. At 3:58 p.m., Pennsylvania State Police ("PSP") arrived and spoke to Respondent.
23. At 4:15 p.m., Respondent entered the Outlander and departed the casino's property.
24. Rivers' Security estimated the age of Minors 1 and 2 to be approximately 3 and 12 years of age.
25. The temperature that day was 79 degrees Fahrenheit.
26. The Outlander was running with the air-conditioner turned on.
27. Pennsylvania State Police ("PSP") were notified and responded but no criminal charges were filed.
28. Respondent returned to Rivers on September 10, 2022, when he left Minors 3 and 4 unattended in the Outlander that was parked in the Rivers' parking lot for approximately 10 minutes.

29. At 2:39 p.m., Respondent parked the Outlander, exited the Outlander, and walked toward the casino.
30. At 2:40 p.m., Respondent entered the gaming floor and proceeded to the sportsbook kiosk.
31. At 2:47 p.m., Respondent departed a sportsbook kiosk and proceeded to a Ticket Redemption Machine.
32. At 2:49 p.m., Respondent exited the casino and returned to the Outlander and spoke with Rivers' security.
33. At 2:59 p.m., PSP arrived and talked to Respondent.
34. At 3:07 p.m., Respondent entered the Outlander and departed the casino's property.
35. Rivers' Security determined Minors 3 and 4 where both 14 years of age.
36. The temperature that day was 83 degrees Fahrenheit.
37. The Outlander was running with the air conditioner turned on.
38. PSP was notified and responded but no criminal charges were filed.
39. Rivers' permanently evicted Respondent from their Property as a result of this incident.
40. There is no indication the Respondent entered Rivers due to any promotional offer.
41. The Respondent endangered the safety of the Minors by leaving the Minors unattended on River's premises.
42. By and through the herein described conduct, Respondent posed a threat to the safety of the patrons, employees or persons on the property of a slot machine licensee, Rivers.
43. By and through the herein described conduct, Respondent performed an act or has a notorious or unsavory reputation adversely affecting public confidence and trust in gaming if permitted to game at Pennsylvania casinos.

44. By engaging in the acts and practices described above, the Respondent meets the definition of a person whose presence is inimical to both the interest of the Commonwealth and of licensed gaming therein.

45. Based upon the allegations contained in the aforementioned paragraphs, the Respondent meets the criteria of exclusion as set forth in 58 Pa. Code §§ 511a.3(a)(4)(iv) and (ix).

**WHEREFORE**, Petitioner requests that the Board place Christopher Vincent on the Exclusion List under the procedures set forth in 58 Pa. Code § 511a.4.

DATED: November 18, 2024

Respectfully Submitted,

Office of Enforcement Counsel  
Cyrus R. Pitre, Chief Enforcement Counsel

By:



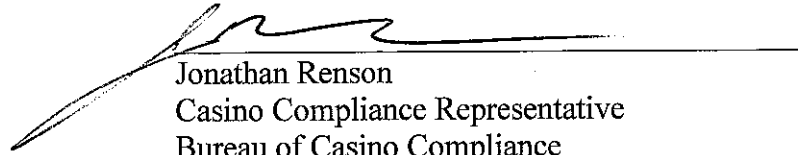
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Andrea Roberts, Esquire  
Assistant Enforcement Counsel  
Pennsylvania Supreme Court ID #333612  
Pennsylvania Gaming Control Board  
Office of Enforcement Counsel  
303 Walnut Street, Strawberry Square  
Commonwealth Tower, 10<sup>th</sup> Floor  
Harrisburg, PA 17101  
andrearobe@pa.gov  
(717) 307-2148

**VERIFICATION**

The undersigned hereby states that the facts above set forth are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 11/22/2024

  
Jonathan Renson  
Casino Compliance Representative  
Bureau of Casino Compliance



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of November 2024 a copy of the Petition was served upon Respondent in the manner of both Certified Mail and U.S. First Class Mail, at:

Christopher Vincent  
7201 Jackson Street  
Philadelphia, PA 19135

Office of Enforcement Counsel  
Cyrus R. Pitre, Chief Enforcement Counsel

By:



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Andrea Roberts, Esquire  
Assistant Enforcement Counsel  
Pennsylvania Supreme Court ID #333612  
Pennsylvania Gaming Control Board  
Office of Enforcement Counsel  
303 Walnut Street, Strawberry Square  
Commonwealth Tower, 10<sup>th</sup> Floor  
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**BEFORE THE  
PENNSYLVANIA GAMING CONTROL BOARD**

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<b>COMMONWEALTH OF PENNSYLVANIA</b>	:	
<b>GAMING CONTROL BOARD</b>	:	<b>PETITION FOR PLACEMENT</b>
	:	<b>ON EXCLUSION LIST</b>
<b>BUREAU OF INVESTIGATIONS AND</b>	:	
<b>ENFORCEMENT,</b>	:	<b>OHA DKT. NO.</b>
<b>Petitioner</b>	:	
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<b>v.</b>	:	<b>INV. ID NOS. 1356-E10203-23</b>
	:	<b>1356-E11189-24</b>
<b>CHRISTOPHER VINCENT,</b>	:	
<b>Respondent</b>	:	

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**PROPOSED ORDER**

AND NOW this \_\_\_\_ day of \_\_\_\_\_, 2025, the Pennsylvania Gaming Control Board, pursuant to the Act of July 5, 2004 (P.L. 57, No. 71) known as the Pennsylvania Race Horse Development and Gaming Act, 4 Pa. C.S. §§ 1101 et seq., hereby ORDERS that Christopher Vincent be placed on the Exclusion List pursuant to 4 Pa. C.S. § 1514.

Pennsylvania Gaming Control Board

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Denise J. Smyler, Chair

**If you disagree with the Board’s Decision and Order you have the right to file an appeal with the Commonwealth Court of Pennsylvania within thirty (30) days of the date of the Order. See Pennsylvania Rule of Appellate Procedure 1512.**

## **Notice of Hearing Rights**

In accordance with 58 Pa. Code §493a.5, you have the following rights in connection with the attached pleading, which has been filed with the Clerk to the Board.

### **Answer to Filing**

**Within 30 days** of service of the complaint or petition filed by the complainant, the respondent may file with the Clerk an Answer to the filing which may contain:

- (1) Admissions of matter complained of and the alleged facts, in whole or part.
- (2) New matter or explanation by way of defense.
- (3) Legal objections.
- (4) Affirmative defenses.
- (5) A request for a hearing.

Answers shall be filed with the Clerk and other parties **within 30 days** after the date of service of a complaint, petition, motion or other pleading, unless a different time is prescribed by the Board or presiding officer. **All Answers must be in writing.**

### **Hearing on the Merits**

The respondent may be entitled to a hearing on the merits if the respondent files the required Answer within thirty (30) days.

### **Failure to File/Appear**

Failure to timely file an Answer or to appear at a subsequent hearing constitutes an admission of all matters and facts contained in the complaint or petition and a waiver of the respondent's rights to a hearing. The Board may conduct a hearing despite a respondent's failure to timely file the required Answer or to appear at the hearing.

**All responses may be filed with the Office of Hearings and Appeals at the following address:**

Pennsylvania Gaming Control Board  
Bureau of Hearings and Appeals  
Office of the Board Clerk  
Strawberry Square Complex, 2<sup>nd</sup> Floor  
P. O. Box 69060  
Harrisburg, Pennsylvania 17101  
(717) 265-7451 - phone  
(717) 265-7416 - fax  
[boardclerk@pa.gov](mailto:boardclerk@pa.gov)



## HEARING REQUEST FORM - EXCLUSIONS

PURSUANT TO 4 Pa.C.S. § 1514(a), THE BOARD SHALL PROVIDE FOR THE EXCLUSION OF INDIVIDUALS WHO ARE CAREER OR PROFESSIONAL OFFENDERS, OR ARE INIMICAL TO THE INTEREST OF THE COMMONWEALTH

**THIS FORM MUST BE RETURNED TO THE ADDRESS BELOW  
WITHIN THIRTY (30) DAYS OF RECEIPT.**

Pennsylvania Gaming Control Board, Office of Hearings and Appeals, Board Clerk  
303 Walnut Street/Strawberry Square  
Commonwealth Tower, 5<sup>th</sup> Floor  
Harrisburg, Pennsylvania 17101

(717) 265-7451 - phone; (717) 265-7416 – fax

Via email to [boardclerk@pa.gov](mailto:boardclerk@pa.gov)

I, \_\_\_\_\_, request a hearing in this matter.  
Name (Please Print)

Please check one of the following options to participate in your hearing:

- Video hearing via Microsoft Teams Application from your computer, cell phone or other device. An invitation will be sent to the email address provided below.
- Telephone hearing where you will connect to the hearing via a Microsoft Teams Application and testify from your telephone. An invitation will be sent to the email address provided below.
- I do not wish to participate in the hearing by video or telephone. I wish to appear in person at a Board office. I understand that Board employees may appear by video even though I am appearing in person.

**\*\*Understand that if your hearing involves the use of video surveillance by the Office of Enforcement Counsel, you will be required to participate from a Board office nearest to the address provided below. You will be notified by the Board Clerk if that is necessary, and the location of the hearing.**

**I understand that it is my responsibility to notify the Office of Hearings and Appeals of any change of my physical or email addresses.**

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
E-Mail Address

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
City State Zip

\_\_\_\_\_  
Date

\_\_\_\_\_  
Telephone number