

**BEFORE THE
PENNSYLVANIA GAMING CONTROL BOARD**

VALLEY FORGE CONVENTION	:	COMMONWEALTH OF
CENTER PARTNERS LLC D/B/A	:	PENNSYLVANIA
VALLEY FORCE CASINO RESORT	:	PENNSYLVANIA GAMING
GID # 19421	:	CONTROL BOARD
	:	
	:	ID NO. 19421-E12277-25
IN RE: UNDERAGE GAMING	:	
VIOLATION	:	DOCKET NO.

ORDER

WHEREFORE, the Pennsylvania Gaming Control Board, pursuant to the Act of July 4, 2004 (P.L. 57, No. 71) known as the Pennsylvania Race Horse Development and Gaming Act, 4 Pa. C.S. §§ 1101 et. seq.; on _____, 2025 after reviewing the matters set forth in the Consent Agreement proposed by the Office of Enforcement Counsel and Valley Forge Convention Center Partners LLC d/b/a Valley Forge Casino Resort (hereinafter “Valley Forge”), Docket No. _____, it is hereby decreed that the attached Consent Agreement is **APPROVED**, and that consistent with the terms of the Consent Agreement, within five days of this ORDER, Valley Forge Casino shall pay a civil penalty in the amount of \$30,000 and administrative fees in the amount of \$2,500.

By the Board:

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.

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VALLEY FORGE CONVENTION	:	COMMONWEALTH OF
CENTER PARTNERS LLC D/B/A	:	PENNSYLVANIA
VALLEY FORGE CASINO RESORT	:	
GID # 19421	:	PENNSYLVANIA GAMING
	:	CONTROL BOARD
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CONSENT AGREEMENT AND STIPULATION OF SETTLEMENT

THIS CONSENT AGREEMENT AND STIPULATION OF SETTLEMENT

is made and entered into by the Commonwealth of Pennsylvania, Gaming Control Board (“Board”), an independent administrative board of the Commonwealth of Pennsylvania, Office of Enforcement Counsel (hereinafter “OEC”); and Category 3 Licensee Valley Forge Convention Center Partners, LLC, d/b/a Valley Forge Casino Resort (hereinafter “Valley Forge”) (collectively referred to as the “Parties”), and

WHEREAS, Valley Forge has its principal place of business at 1160 First Avenue, King of Prussia, PA 19406. Valley Forge is the holder of a Category 3 Slot Machine License and a Table Games Certificate as renewed by the Board on November 16, 2022; and,

WHEREAS, OEC is the prosecutorial body established by 4 Pa.C.S. § 1517(a.2) and has the power and duty to initiate proceedings for administrative violations of the Act pursuant to section 1517(a.2)(1)(iii) of the Act; and

WHEREAS, the Parties, through their authorized representatives whose signatures are affixed hereto, have investigated the events that are the subject of this Consent

Agreement (“Events”), have conferred extensively on the Events, and now desire to conclusively and amicably resolve all matters arising out of the Events, and enter into a Consent Agreement before the adjudication of a Complaint, pursuant to 59 Pa. Code § 493a.1(a), which provides “[p]arties may propose consent agreements at any time prior to the entry of a final order;” and

WHEREAS, pursuant to 4 Pa.C.S. § 1102(1), the primary objective of the Act to which all other objectives and purposes are secondary is to protect the public through the regulation and policing of all activities involving gaming and practices that continue to be unlawful; and

WHEREAS, 4 Pa. C.S. §1207(8) provides that the Board shall have the power and its duties shall be to require that each licensed gaming entity prohibit persons under 21 years of age from operating or using slot machines or playing table games;

WHEREAS, 4 Pa.C.S. §1518(a)(13) states it shall be unlawful for an individual under 21 years of age to enter and remain in any area of a licensed facility where slot machines are operated or the play of table games is conducted, except that an individual 18 years of age or older employed by a slot machine licensee, a gaming service provider, the board or any other regulatory or emergency response agency may enter and remain in any such area while engaged in the performance of the individual's employment duties;

WHEREAS, 4 Pa. C.S. §1518(a)(13.1) states it shall be unlawful for an individual under 21 years of age to wager, play or attempt to play a slot machine or table game at a licensed facility;

WHEREAS, 4 Pa. C.S. §1207(8) the Board has the power and duty to require that a licensed facility prohibits persons under 21 years of age from operating or using slot machines or engaging in play at table games;

WHEREAS, 58 Pa. Code§ 513a.2(a) in relevant part provides that “an individual under 21 years of age may not enter or be on the gaming floor of a licensed facility...”

WHEREAS, 58 Pa. Code§ 513a.2(b) in relevant part provides that "an individual under 21 years of age, whether personally or through an agent, may not operate, use, play or place a wager on, a slot machine in a licensed facility;

WHEREAS, 58 Pa. Code § 513a.3(b) provides that a slot machine licensee shall establish procedures that are designed to prevent violations of 58 Pa. Code§ 513a2(b);

WHEREAS, pursuant to 58 Pa. Code § 513a.5, in any prosecution or other proceeding against a person for a violation of chapter 513 of the Pennsylvania Code, it shall be no defense that the person believed an individual to be 21 years of age or older;

WHEREAS, pursuant to 58 Pa. Code § 513a.2(c), an individual under 21 years of age may not receive check cashing privileges, be rated as a player, or receive any complimentary service, item or discount as a result of, or in anticipation of gaming activity;

WHEREAS, pursuant to Paragraph 36 of Valley Forge’s executed Statement of Conditions approved September 8, 2022, with additional final amendments most recently approved February 1, 2024, Valley Forge agreed to at all times comply with its Compulsive and Problem Gambling Plan submitted to and approved by the Board pursuant to 58 Pa. Code Chapters 501, 503, 511, and 513; and

WHEREAS, pursuant to Section #15 titled Procedures to Prevent Underage Gambling of Valley Forge’s approved Compulsive and Problem Gambling Plan

(hereinafter “CPGP”), dated September 8, 2022, “Persons under the age of twenty-one (21) (“underage”) are prohibited from gambling, of from entering VFCR’s gaming floor”.

WHEREAS, pursuant to Procedure 2 of the Procedures to Prevent Underage Gambling Section of the CPGP, “Prior to entering the gaming floor, all patrons who appear under the age of 30...will be asked, by Security Officers, to verify their age by producing valid, legally acceptable government issued photo identification...”

WHEREAS, pursuant to Procedure 5, Section G of the Procedures to Prevent Underage Gambling Section of the CPGP, specific departments have duties and responsibility to verify the identification of individual to ensure that an individual engaging in gaming is not underage, including in part, the Surveillance Department, the Slots Department, The Table Games Department and the Food and Beverage Department.

WHEREAS, pursuant to Procedure 5, Section H of the Procedures to Prevent Underage Gambling Section of the CPGP, food and beverage staff have the authority to challenge any patron, attempting to purchase alcohol as well as a duty to notify food and beverage staff who have patron contact to notify a Food and Beverage Manager if a patron appears to be under 21 years of age and is on the gaming floor or consuming or attempting to consume alcohol.

WHEREAS, the Parties do not dispute the jurisdiction of the Board; and

WHEREAS, the Parties now seek to enter into this Consent Agreement as a compromise of any disputed claims and in consideration of the Parties waiving, releasing, and forbearing any regulatory dispute.

NOW, THEREFORE, the Parties stipulate and agree, and present to the Board for its consideration, the following:

STIPULATION OF FACTS

On November 18, 2024, an underage individual, with a date of birth of December 20, 2010 and who was thirteen years of age at the time of the incident was identified on the gaming floor. The underage individual and his father were on property beginning on November 17, 2024 at 1:40 p.m. until November 18, 2024 at approximately 10:42 a.m. and they were staying in a Casino Towers Room. The underage individual arrived on property with and was staying on property with his father.

On November 17, 2024, at 1:47 p.m., the underage individual entered the gaming floor along with his father by utilizing the legitimate identification belonging to his father showing a date of birth of January 5, 1992. Upon presentation, one security officer viewed the identification and attempted to scan it, but it would not scan. The security officer then handed the identification to a second security officer who successfully scanned the license. After scanning the identification, the second security officer returned the identification to the father believing the father had presented the identification and then permitted the underage individual and his father to enter the gaming floor. The underage individual and his father remained on the gaming floor until 7:50 p.m. Upon leaving the gaming floor, the underage individual and his father interacted with security personnel at the main entrance.

On November 17, 2024, the underage individual spent approximately six hours on the gaming floor. He spent the majority of this time in the presence of his father both viewing his father game, exchanging cash and vouchers with his father and engaging in gaming activity by inserting funds into slot machines, cashing out vouchers from slot machines and actively gaming at multiple slot machines with his father. The underage individual was given \$600 in bills from his father to game with, the total amount inserted

into slot machines by the underage individual was \$1,040 which was comprised of vouchers from gaming activity and the \$600 in bills. The total amount played by the underage individual was \$1,640. The underage individual also cashed in slot machine vouchers at multiple NRT machines and printed out multiple vouchers from slot machines. In total, the underage individual gamed for approximately 3 hours and 12 minutes at approximately five slot machines in the C Section of the gaming floor.

During his time on the gaming floor the underage individual was on one occasion served a soda by casino personnel and on another occasion served a soda and a beer by casino personnel. The underage individual immediately handed the beer to his father and there is no evidence that he consumed an alcoholic beverage during his time on the gaming floor.

On November 18, 2024, at 8:16 a.m., the underage individual and his father attempted to enter the gaming floor at the Main Entrance and was turned away by security personnel and then departed the area. The underage individual and his father ultimately retrieved their belongings and left the premises. As a result of the underage individual being denied entry to the gaming floor on November 18, 2024 and the review of the surveillance of that incident, surveillance personnel recognized that the underage individual had gained access to the gaming floor on November 17, 2024 and a full surveillance review was conducted. Surveillance personnel immediately notified the Pennsylvania State Police and the Bureau of Casino Compliance when they discovered the underage individual had been on the gaming floor and the details of their review.

As a result of this incident, the underage individual and the father were evicted from the premises. PSP issued a summary citation to the father for "Aiding and Abetting", 4

Pa.C.S. §1518(D). According to the publicly available docket sheet related to this incident, the father entered into a guilty plea to summary “Unlawful to permit persons under 21”, 4 Pa.C.S. §1518(A)(13) on January 8, 2025. As a result of his actions, the underage individual was charged with summary “Unlawful to Enter and Remain in a Facility Under 21 Years of Age”, 4 Pa.C.S. §1518(a)(13) and “Unlawful For Person Under 21 To Wager/Play Slots”, 4 Pa.C.S. §1518(a)(13). As a result of the underage individual being a juvenile, a disposition of those citations is not publicly available.

Overall, the underage individual was present on the gaming floor for approximately six hours, with approximately 3 hours and 12 minutes of that time gaming at various slot machines. In total, the underage individual was allowed to insert funds and actively game with \$1,640 and was provided with a beer by a cocktail server that he immediately handed to his father and did not consume.

This incident was immediately reported to the Bureau of Casino Compliance.

REMEDIAL MEASURES

Following the incident, Valley Forge undertook an internal review of this underage access incident and Valley Forge’s underage access prevention procedures. The purpose of the internal review was two-fold: (1) to diagnose and remediate how the underage individual accessed and remained on the gaming floor and (2) to review and enhance training, disciplinary action and the use of technology surrounding underage access to implement additional remedial measures to ensure their actions reflect that commitment to preventing underage access and to minimize the risk of further instances in the future. The following is a summary of the remedial measures taken as part of this internal review.

Valley Forge issued final written warnings to each of the security officers at the entrance to the gaming floor when the underage individual access the gaming floor for failing to detect that the underage individual presented an identification that he borrowed from his father. Reflecting the seriousness of the omission, the final written warnings skipped three levels of discipline in Valley Forge's system of progressive discipline (verbal coaching, documented verbal warning, & written warning).

As a further measure, Valley Forge required all security officers undergo refresher training to reinforce and refresh each officer's skills and ability to detect underage individuals and, in particular, borrowed identification. As part of the refresher training, Valley Forge enhanced its training materials to better equip team members with a specific procedure and set of skills to recognize small differences between the facial appearance of a patron and an ID that the patron borrowed from someone bearing a similar resemblance.

In addition to the security officers referenced above, Valley Forge issued the cocktail server that served the underage individual two sodas and a beer without requesting identification a written warning. Reflecting the seriousness of the omission, the written warning skipped two levels of discipline (verbal coaching and documented verbal warning). As a further measure, Valley Forge issued all beverage servers a "Read and Sign" to reinforce their responsibility to request ID from patrons that appear under 35 and warning them that they would be subject to further enhanced discipline.

In addition to the employees referenced above, Valley Forge's review identified two additional security officers who walked behind and past the underage individual while the underage individual was seated at a slot machine during the security officer's patrol of the gaming floor. Valley Forge's review also identified two security officers stationed at

the entrance of the gaming floor when the underage individual exited the gaming floor who briefly interacted with the underage individual and his father for approximately 25 seconds. Valley Forge issued each of these four security officers documented verbal warnings to reinforce their responsibility to detect and remove underage individuals even on the gaming floor in the event one accesses the gaming floor.

As a further measure to emphasize that employees across departments share in the responsibility to detect and report possible underage individuals, Valley Forge's review identified nine additional employees in slot operations, table game operations or cage operations who were briefly in proximity to the underage individual and issued each individual a verbal coaching to reinforce their respective responsibilities as part of Valley Forge's underage access prevention procedures. Valley Forge also issued all team members in (i) slot operations, (ii) table game operations, (iii) sportsbook operations, (iv) beverage operations and (v) cage operations a "Read and Sign" to remind and reinforce them of their responsibility to detect and prevent underage access even when patrons are already on the gaming floor.

HISTORY

This is the first consent agreement of this nature between OEC and Valley Forge since Valley Forge's Category 3 slot machine license was last renewed by the Board in November 2022. OEC has issued three warning letters related to underage gaming violations during Valley Forge's Category 3 most recent renewal period. On March 1, 2023, regarding one underage violation wherein a patron was able to enter the gaming floor while holding his two-year-old child for approximately seven seconds. On May 12, 2023, regarding one underage violation where an 18-year-old former employee at Valley Forge

was allowed entry to the gaming floor when security personnel mistakenly believed the individual was present and entering for the purposes of employment. This individual was on the gaming floor for approximately 47 minutes and did not engage in gaming activity or consume alcohol. Finally, on August 13, 2024, a nineteen-year-old was allowed entry to the gaming floor when the scanner malfunctioned. The error was discovered two minutes after the underage individual entered the gaming floor and she was removed from the gaming floor approximately fifteen minutes after entry. During this time, the underage individual did not game but was allowed to consume one sip of alcohol.

TERMS OF AGREEMENT

In consideration of the foregoing stipulated facts, and in full and final settlement of any and all claims, or causes or actions which could or might be brought under the Act or the regulations promulgated thereunder, whether against Valley Forge, or any of its owners, employees or agents, arising out of the matters identified in the above stipulated facts, the Parties do hereby further stipulate and agree that:

1. This Consent Agreement shall become final and effective only upon its approval by the Board;
2. Valley Forge shall pay a civil penalty in the amount of thirty thousand dollars (\$30,000) within five days of the Board's Order approving this consent agreement.
3. Valley Forge shall immediately institute policies and provide training, guidance, and reinforcement to its employees, which will minimize the opportunity for similar incidents to occur in the future;

4. Within five days of the Board's Order approving this Consent Agreement, Valley Forge shall pay to the Board two thousand five hundred dollars (\$2,500.00) for the costs incurred by OEC, BIE and other related staff in connection with this matter;

5. If approved, the Board may make information public with respect to the terms and conditions of this Consent Agreement;

6. This Consent Agreement may be set aside by the Board if any term herein is violated by Valley Forge; and

7. Valley Forge, through its authorized representative whose signature appears below, has read and fully understands the terms of this Consent Agreement.

This Consent Agreement is offered and, if approved by the Board, entered for settlement purposes only. If the Board determines not to approve the effectiveness of same, then this Consent Agreement and the representations and obligations contained herein shall be null and void, and neither Party nor any other person shall be entitled to use or rely on any portion hereof for any purpose whatsoever or to admit any portion hereof into evidence in the captioned matter or any subsequent proceeding. This Consent Agreement shall not preclude the Board, BIE or OEC from reviewing and considering any facts in any future proceeding relating to any application for licensure or qualification of the licensee. Valley Forge expressly acknowledges and agrees that the Board reserves the right to take any actions that the Board, in its sole discretion, believes is necessary to protect the integrity of gaming in Pennsylvania, including the right to suspend or revoke any license, approval or permit without limitation if any further violations occur or are subsequently discovered, all in accordance with the Act and the regulations promulgated thereunder.

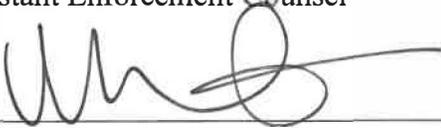
The undersigned consent to the form and entry of the above.

**Pennsylvania Gaming Control Board
Office of Enforcement Counsel**



By: SARAH E. KOLESAR
Assistant Enforcement Counsel

DATED: July 1, 2025



By: MARTHA MORALES
Vice President, General Manager
Valley Forge Casino Resort

DATED: 7/1/25