

STATE OF FLORIDA  
FLORIDA GAMING CONTROL COMMISSION

FLORIDA GAMING CONTROL COMMISSION,  
DIVISION OF PARI-MUTUEL WAGERING,

Petitioner,

v.

FGCC Case No.: 2022-039095

MAURICIO PAZOS,

Respondent.

\_\_\_\_\_ /

**FINAL ORDER**

This matter appeared before the Florida Gaming Control Commission at a duly-noticed public meeting on February 8, 2023, for final agency action pursuant to sections 120.569 and 120.57(2), Florida Statutes. After a complete review of the records in this matter, the Commission makes the following findings of fact and conclusions of law:

1. An Administrative Complaint was filed in this case on October 19, 2022, alleging that Respondent is subject to exclusion from all licensed pari-mutuel facilities and all facilities of a slot machine licensee in the state of Florida under sections 550.0251(6) and 551.112, Florida Statutes. A copy of the Administrative Complaint is attached hereto as Exhibit "1" and incorporated by reference.

2. The Administrative Complaint, Election of Rights form, an Explanation of Rights, and a cover letter were served on Respondent via certified mail on October 24, 2022. Proof of service is attached hereto as Exhibit "2" and incorporated by reference.

3. The Election of Rights form, Explanation of Rights, and cover letter informed Respondent that a written response to the Complaint, including the right to request a hearing, was

due within 21 days of actual service of the Complaints. See § 120.569(1), Fla. Stat., and Fla. Admin. Code R. 28-106.111.

4. Petitioner informed Respondent that the failure to file a timely response to the Complaint would be deemed a waiver of the right to a hearing.

5. Respondent has not filed a timely response to the Complaint. Respondent has not submitted any evidence or made any allegations that would support the application of the doctrine of equitable tolling.

Having considered the Complaint, the service of the Complaint with Election of Rights form, Explanation of Rights, and cover letter on Respondent along with Respondent's failure to respond, and being otherwise fully advised in the premises, it is hereby

ORDERED and ADJUDGED:

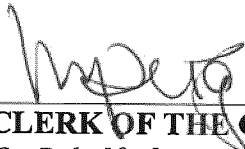
6. The allegations of fact and the conclusions of law in the Administrative Complaint are adopted in their entirety herein.

7. Respondent is hereby **PERMANENTLY EXCLUDED** from all pari-mutuel facilities and all facilities of a slot machine licensee within the State of Florida.

*This Final Order shall take effect upon being filed with the Clerk of the Commission.*

**DONE AND ORDERED** this 9<sup>th</sup> day of FEBRUARY, 2023.

FLORIDA GAMING CONTROL COMMISSION

  
\_\_\_\_\_  
**CLERK OF THE COMMISSION**  
*On Behalf of*  
Michael Yaworsky, Vice-Chairman  
Julie Brown, Commissioner  
John D'Aquila, Commissioner  
Charles Drago, Commissioner

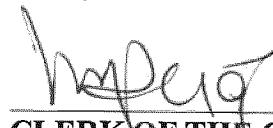
### NOTICE OF RIGHT TO APPEAL

Any party to this proceeding has the right to seek its judicial review under section 120.68, Florida Statutes, by the filing of an original notice of appeal pursuant to rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Commission, 2601 Blair Stone Road, Tallahassee, Florida 32399-2202 (Email: [clerk@fgcc.fl.gov](mailto:clerk@fgcc.fl.gov)), and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate Florida district court of appeal. The notice of appeal must be filed (received) by the Clerk of the Commission within thirty (30) days after the date this Order is filed with the Clerk of the Commission.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9<sup>th</sup> day of FEBRUARY, 2023, a true and correct copy of this Final Order has been sent via U.S. Mail to:

**Mauricio Pazos**  
400 Southwest 1st Avenue, Apt. 404  
Fort Lauderdale, Florida 33301



---

**CLERK OF THE COMMISSION**  
Florida Gaming Control Commission

CC: Ebonie Lanier

**FILED**  
FLORIDA GAMING CONTROL COMMISSION  
Date: 10/19/2022  
File Number: \_\_\_\_\_  
BY: MELBA L. APELLANIZ  
CLERK OF THE COMMISSION

STATE OF FLORIDA  
FLORIDA GAMING CONTROL COMMISSION  
DIVISION OF PARI-MUTUEL WAGERING

FLORIDA GAMING CONTROL COMMISSION,  
DIVISION OF PARI-MUTUEL WAGERING,

Petitioner,

v.

FGCC Case No.: 2022-039095

MAURICIO PAZOS,

Respondent.

\_\_\_\_\_ /

ADMINISTRATIVE COMPLAINT

The Florida Gaming Control Commission, Division of Pari-Mutuel Wagering (“Petitioner”), files this Administrative Complaint against Mauricio Pazos (“Respondent”), and alleges:

1. Petitioner is the state agency charged with regulating pari-mutuel wagering, slot machines, and cardroom operations pursuant to Chapters 550, 551, and 849, Florida Statutes.

COUNT I

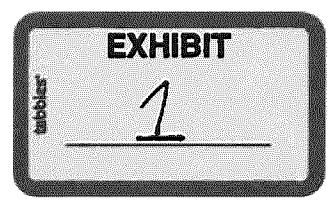
2. At all times material hereto, Bonita Springs Poker Room was a facility operated by a permitholder authorized to conduct pari-mutuel wagering and cardroom operations in the State of Florida.

3. On or about June 1, 2022, Respondent was a patron of Bonita Springs Poker Room.

4. On or about June 1, 2022, Respondent was ejected and permanently excluded from Bonita Springs Poker Room.

5. Respondent was permanently excluded for the reasons alleged in Exhibit 1.

6. Section 550.0251(6), Florida Statutes, provides in relevant part:



In addition to the power to exclude certain persons from any pari-mutuel facility in this state, the commission may exclude any person from any and all pari-mutuel facilities in this state for conduct that would constitute, if the person were a licensee, a violation of this chapter or the rules of the commission. The commission may exclude from any pari-mutuel facility within this state any person who has been ejected from a pari-mutuel facility in this state or who has been excluded from any pari-mutuel facility in another state by the governmental department, agency, commission, or authority exercising regulatory jurisdiction over pari-mutuel facilities in such other state.

(Emphasis supplied).

7. Based on the foregoing, Respondent is subject to exclusion from all licensed pari-mutuel wagering facilities in the State of Florida under Section 550.0251(6), Florida Statutes, based on his ejection from Bonita Springs Poker Room on or about June 1, 2022

#### COUNT II

8. At all times material hereto, Magic City Casino was a facility operated by a permit holder authorized to conduct pari-mutuel wagering, slot machines, and cardroom operations in the State of Florida.

9. On or about June 6, 2022, Respondent was a patron at Magic City Casino.

10. On or about June 6, 2022, Respondent was ejected and permanently excluded from Magic City Casino.

11. Respondent was permanently excluded for the reasons alleged in Exhibit 1.

12. Section 550.0251(6), Florida Statutes, provides in relevant part:

In addition to the power to exclude certain persons from any pari-mutuel facility in this state, the commission may exclude any person from any and all pari-mutuel facilities in this state for conduct that would constitute, if the person were a licensee, a violation of this chapter or the rules of the commission. The commission may exclude from any pari-mutuel facility within this state any person who has been ejected from a pari-mutuel facility in this state or who

has been excluded from any pari-mutuel facility in another state by the governmental department, agency, commission, or authority exercising regulatory jurisdiction over pari-mutuel facilities in such other state.

(Emphasis supplied).

13. Section 551.112, Florida Statutes, provides:

In addition to the power to exclude certain persons from any facility of a slot machine licensee in this state, the commission may exclude any person from any facility of a slot machine licensee in this state for conduct that would constitute, if the person were a licensee, a violation of this chapter or the rules of the commission. The commission may exclude from any facility of a slot machine licensee any person who has been ejected from a facility of a slot machine licensee in this state or who has been excluded from any facility of a slot machine licensee or gaming facility in another state by the governmental department, agency, commission, or authority exercising regulatory jurisdiction over the gaming in such other state. This section does not abrogate the common law right of a slot machine licensee to exclude a patron absolutely in this state.

(Emphasis supplied).

14. Based on the foregoing, Respondent is subject to exclusion from all licensed pari-mutuel wagering facilities and any facility of a slot machine licensee in the State of Florida under Sections 550.0251(6) and 551.112, Florida Statutes, based on his ejection from Magic City Casino on June 6, 2022.

WHEREFORE, Petitioner respectfully requests the Florida Gaming Control Commission enter an Order excluding Respondent from all licensed pari-mutuel wagering facilities and any facility of a slot machine licensee in the State of Florida, along with any other remedy provided by Chapters 550 and 551, Florida Statutes, and/or the rules promulgated thereunder.

This Administrative Complaint for FGCC Case Number 2022-039095 is signed this 17th day of October 2022.

*/s/ Emily A. Alvarado*

---

Emily A. Alvarado  
Deputy Chief Attorney  
Florida Bar Number: 1025200  
Florida Gaming Control Commission  
Office of the General Counsel  
Division of Pari-Mutuel Wagering  
2601 Blair Stone Road  
Tallahassee, Florida 32399-2202  
Telephone: (850) 717-1783  
Facsimile: (850) 921-1311  
Primary: Emily.Alvarado@fgcc.fl.gov  
Secondary: Ebonie.Lanier@fgcc.fl.gov



NOTICE OF RIGHTS TO REQUEST A HEARING

Pursuant to Sections 120.569 and 120.57, Florida Statutes, you have the right to request a hearing to challenge the charges contained in this Administrative Complaint. If you choose to request a hearing, you will have the right to be represented by counsel, or other qualified representative, to present evidence and argument, to call and cross-examine witnesses, and to have subpoenas and subpoenas duces tecum issued on your behalf.

Any request for an administrative proceeding to challenge or contest the charges contained in this Administrative Complaint must conform to Rule 28-106.2015, Florida Administrative Code. Pursuant to Rule 28-106.111, Florida Administrative Code, you must request a hearing within 21 days from receipt of this Notice, or you will waive your right to request a hearing.

Mediation under Section 120.573, Florida Statutes, is not available to resolve this Administrative Complaint.

VR Home	Inbox	Entity	Application	License	Cash	Exam	Inspection	Enforcement	Report
---------	-------	--------	-------------	---------	------	------	------------	-------------	--------

Complaint Search    Change Recording License Type    Delete Complaint    Mass Activity Update    Mass Discipline Update  
 Mass Status Update    Public Case Info

Domain **10 - Division of Pari-Mutuel Wagering**

Logged in as: **Imuniz**

VR Home > Complaint Search > Maintain Complaint

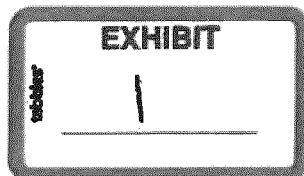
Lic Type	<b>1098 - Unlicensed Complaints</b>	Status	<b>90 Closed</b>	Status Date	<b>09/30/2022</b>
Complaint #	<b>2022039095</b>	Case Type	<b>CMP - Complaint</b>	Disposition	Disposition Date
Docket#	Respondent	<b>PAZOS, MAURICIO</b>	Responsible	<b>bjones - JONES, BRADFORD</b>	<b>Private Case</b>

Complaint	Respondent	Complainant	Add'l Info
-----------	------------	-------------	------------

Source	<b>INTN - Internal</b>	Security Level	<b>1</b>	<input type="checkbox"/> Parties	<input checked="" type="checkbox"/> Activities	
Form	<b>INTR - Internal</b>	Priority		<input checked="" type="checkbox"/> Allegations	<input type="checkbox"/> Discipline	
Class'n	<b>V-C - Cardroom Violations</b>	Complexity	<b>R - Regular</b>	<input type="checkbox"/> Violations	<input type="checkbox"/> Compliance	
Security	<b>STND - Standard</b>	Incident	<b>06/01/2022</b>	<input checked="" type="checkbox"/> Related	<input checked="" type="checkbox"/> Disposition	
Region	<b>SR - Southern Region</b>	Received	<b>08/11/2022</b>	<input type="checkbox"/> Inspection		
Reference	<b>550.0251(6) &amp; 61D-11.005(4)</b>			<input type="checkbox"/> Costs		
Entered	<b>08/11/2022</b>	Entered By	<b>Imuniz</b>	<input type="checkbox"/> Time Tracking	<input type="checkbox"/> Auto Assign	
Summary	<p><b>142-Bonita-Fort Myers Corporation ----- / ----- . Prohibitions &amp; The powers and duties of the Florida Division of Pari-mutuel Wagering of the Florida Gaming Control Commission: On June 1, 2022, PAZOS was observed by Bonita Springs Poker Room (BSPR) Surveillance and Poker room Staff, marking cards and signaling to another player (Alejanor TOLEDO) during a poker game by indenting the edges on high ranking cards (Queen, King, Ace) in order to gain an advantage over other players. BSPR, has indicated that both PAZOS and TOLEDO have been permanently excluded from that facility.</b></p>				<input type="checkbox"/> Attachments	<input type="checkbox"/> History
Updated	<b>10/03/2022 13:52:50</b>	By	<b>Imuniz</b>	<input type="checkbox"/> Work Notes	<input type="checkbox"/> Print Report	

50	<input type="button" value="Change"/>	<input type="button" value="Save"/>	<input type="button" value="OK"/>	<input type="button" value="Cancel"/>	<input type="button" value="Back"/>
----	---------------------------------------	-------------------------------------	-----------------------------------	---------------------------------------	-------------------------------------

Get Adobe Reader.








Louis Trombetta, Executive Director

Ron DeSantis, Governor

**OFFICE OF INVESTIGATIONS  
 INVESTIGATIVE REPORT**

<b>Office:</b> PMW	<b>Region:</b> Southern	<b>Date of Complaint:</b> August 1, 2022	<b>Case Number:</b> 2022 03 9095
<b>Respondent:</b>  PAZOS, MAURICIO 1235 FAIRLAKE TRACE # 503 WESTON, FLORIDA 33326		<b>Complainant:</b>  DIVISION OF PARI-MUTUEL WAGERING OFFICE OF INVESTIGATIONS 1400 W. COMMERCIAL BLVD. SUITE 165 FORT LAUDERDALE, FLORIDA 33309	
<b>License # and Type:</b> N/A		<b>Profession:</b> Patron	<b>Report Date:</b> September 16, 2022
<b>Period of Investigation:</b> August 1, 2022-September 16, 2022		<b>Type of Report:</b> FINAL	
<p><b>Alleged Violation: F.S. 550.0251(6)</b> In addition to the power to exclude certain persons from any pari-mutuel facility in this state, the division may exclude any person from any and all pari-mutuel facilities in this state for conduct that would constitute, if the person were a licensee, a violation of this chapter or the rules of the division. The division may exclude from any pari-mutuel facility within this state any person who has been ejected from a pari-mutuel facility in this state or who has been excluded from any pari-mutuel facility in another state by the governmental department, agency.</p> <p><b>RULE: 61d-11.005(4)(b)</b> No person shall directly or indirectly: Engage in any act, practice or course of operation that would constitute a fraud or deceit upon any participant in a game or the card room operator.</p>			
<b>Related Case(s): 2022 03 7047</b>			
<b>Synopsis:</b> PAZOS has been permanently excluded from the Bonita Springs Poker Room (BSPR) and Magic City Casino (MCC) for cheating at poker by marking cards.			
<b>Investigations Specialist II / Date</b>   Lisa Vila/ September 16, 2022		<b>Approved by Investigator Supervisor / Date</b>   Bradford D. Jones / September 30, 2022	
<b>Chief of Investigations / Date</b>   Bradford D. Jones for Steven E. Kogan / September 30, 2022			

## CONTINUATION

This investigation was launched after information was received from Bonita Springs Poker Room (BSPR) Director of Security, Ken Jones concerning individuals who were apparently cheating during a poker game. Jones provided a follow-up E-Mail containing a BSPR Surveillance Report concerning the incident (**EXHIBIT #1**). I responded to BSPR whereupon I confirmed patron MAURICIO PAZOS, marked cards while playing poker. PAZOS was permanently excluded from BSPR on June 22, 2022 along with his associate, Alejandro Toldeo.

The sequence of events leading to the discovery is as follows:

On March, 22, 2022 a deck of cards was pulled from table 18 when the Dealer noticed a bad card (bent edge). The Floor Person, Josh Dinkel removed the deck from the table and upon his inspection of the deck he noticed that high cards were marked on the sides. Dinkel then reviewed surveillance footage and took note of the players at the table during the time the deck was in play. Dinkel left BSPR Poker Manager, Cindy Fra a note detailing the incident along with the damaged cards for her review.

On March 23, 2022, Fra reviewed the surveillance footage and observed the actions of the individuals involved. A short time later, Fra noticed that the players noted above had returned to the facility and were once again seated at table 18. Fra then alerted BSPR Floor Staff, Dominick Biagi and instructed him to observe the actions of PAZOS and his associate Toldeo.

After several hands of play, Fra responded to table 18 and had the cards switched out to inspect for any markings; at that time she noted several high cards with indentations on the edges. New cards were then utilized at the table so the game could resume. Fra alerted BSPR Surveillance and Security to also observe the players actions. As the events were unfolding, BSPR staff made it obvious to PAZOS and Toledo they were under observation. The subjects responded by discontinuing the card marking activity.

When Fra had the cards removed a second time, PAZOS, Toldeo and another possibly involved player made a noticeable reaction to the cards being replaced. According to Fra, throughout the period that PAZOS and Toledo were under observation, it appeared they were signaling and texting each other. PAZOS and his associates played for approximately an hour and left the facility without further incident. While the individuals were under close observation, no additional cards were altered.

On June 1, 2022 at BSPR, Fra observed the aforementioned individuals enter the facility; two of the individuals requested the Brush to sit them at the same table. Fra observed the individuals and once again the deck was removed from the table due to a bad card. Fra inspected the deck and markings were noticed in the same manner from the March 22 and 23, 2022 incidents involving the same individuals. BSPR once again initiated the same surveillance method on the individuals and removed the cards a second time, and again the cards were found to be indented on the sides. Fra viewed the surveillance footage and Toldeo was observed covering his cards with his hands in a manner that would be consistent altering the cards. PAZOS and Toldeo were also using cellular phones while playing.

The cheating method employed by PAZOS and his associates is called "Edge Work". In this type of dishonesty, an individual will nick or slightly indent the edges of playing cards by applying pressure with a fingernail at strategic points.

## CONTINUATION

The indentations in this case were positioned as ACE - top corner, KING approximately ¼ inch lower, QUEEN ¼ inch below KING followed by JACK and TEN each another ¼ inch lower. The marks are placed on the top left and bottom right of the cards during the course of play as the cheat receives cards.

The key to identify an individual doing "Edge Work" is observing them as they handle their cards, taking an opportunity to apply pressure to one edge of a card then rotating the card to duplicate the mark on the opposite edge. I noted this action while reviewing the BSPR surveillance recordings of the incident (**EXHIBIT #2**). Examination of the cards handled by **PAZOS** and Toldeo coincides with their physical actions. Analysis of the video confirmed **PAZOS** apparently applied pressure to one edge of various cards he had been dealt and then rotated the card(s) to mark the opposing edge. The marks made indicate ACE, KING, QUEEN, JACK.

Fra and BSPR Security then approached **PAZOS** and Toldeo advised them that due to their suspicious activity, their actions warranted a permanent ejection. Toldeo became irate, and refused to sign an exclusion form or provide his identification. **PAZOS** signed the BSPR Notice of Exclusion and all individuals left the facility.

Security Director Ken Jones then alerted Magic City Casino, an affiliate facility of BSPR, of the incident and shared surveillance photos of **PAZOS** and Toldeo along with a synopsis of the incident that led to the permanent exclusion of both subjects.

On June 6, 2022 **PAZOS** and Toldeo were identified by Magic City Casino (MCC) Security at table 22. The individuals were then escorted to the security vestibule by Kevin Mejia, Security Supervisor. Mejia along with Miami Police Officer, G. Arteaga advised **PAZOS** and Toldeo that they were being excluded permanently from the facility. **PAZOS** and Toldeo acknowledged and understood the restrictions of the exclusion; however they both refused to sign the trespass warning form or provide any other information. Officer Arteaga escorted them to the parking lot and was able to get the license tag information from the vehicle they occupied. As per Arteaga, the vehicle is registered to **TOLDEO**. Due to the quick actions of MCC Security, the individuals were intercepted before they were able to participate in any card play.

**Conclusion:** **PAZOS** has violated Rule 61d-11.005(4)(b). Because of their actions, **PAZOS** and Toldeo (Case Number 2022 03 7047) were permanently excluded from BSPR and MCC (**EXHIBIT #3**). As such, they are also candidates for exclusion from all pari-mutuel facilities in the state of Florida.

**Status:** Case closed by Investigations and forwarded to Legal for review.

**CONTINUATION**

**TABLE OF CONTENTS**

- I. INVESTIGATIVE REPORT COVERSHEET ..... 1
- II. INVESTIGATIVE REPORT .....1
- III. EXHIBITS
  - 1. BSPR Security Reports..... 1-5
  - 2. Property Receipt –BSPR Surveillance Thumb Drive.....1-1
  - 3. BSPR Exclusion.....1-1
  - 4. Photo of Damaged Cards BSPR and Card Case.....1-3
  - 5. MCC Security Reports..... 1-10
  - 6. Versa Printout..... 1-1



# Incident Report

Report # 22-073	Occurred: Date: 06-01-2022	Time: 1630
Type of Incident: Patron Ejection	Location: Poker Room	
Name: Pazos, Mauricio	SSN:	DOB:
Address:	City/State/Zip	
Affiliation: <input type="checkbox"/> Employee <input checked="" type="checkbox"/> Patron <input type="checkbox"/> Vendor	Involvement: <input type="checkbox"/> RP/V <input type="checkbox"/> Witness <input checked="" type="checkbox"/> Suspect	
Phone:	Other: mauripazos@gmail.com	
Name: Doe, John	SSN:	DOB:
Address:	City/State/Zip	
Affiliation: <input type="checkbox"/> Employee <input checked="" type="checkbox"/> Patron <input type="checkbox"/> Vendor	Involvement: <input type="checkbox"/> RP/V <input type="checkbox"/> Witness <input checked="" type="checkbox"/> Suspect	
Phone:	Other:	
Name:	SSN:	DOB:
Address:	City/State/Zip	
Affiliation: <input checked="" type="checkbox"/> Employee <input type="checkbox"/> Patron <input type="checkbox"/> Vendor	Involvement: <input checked="" type="checkbox"/> RP/V <input type="checkbox"/> Witness <input type="checkbox"/> Suspect	
Phone:	Other:	
Alcohol Involved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Ejected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Trespass Warning? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Law Enforcement involved? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Officer:	Report#
Synopsis: <p>On 06-01-22 I was requested by the Poker Room Manager to remove and trespass an individual, identified as Pazos for suspicion of violating 61D-11.005 (4) c of the Florida Administrative Code.</p> <p>After the ejection (1640) an unidentified patron, who claimed to be a friend of Pazos, was ejected from the Poker Room by Security Manager Matos after he became loud and disorderly demanding to know why Pazos was ejected.</p>		
Agent's Signature:	Date: 06-01-22	Reviewed by:



# Incident Report Continuation

**Report #22073**

At approximately 1640 Poker Floor Manager Joe Ruiz called the Security Office and informed me that a patron was arguing with Poker Management and refused to leave. I responded to the poker supervisor station to find the patron arguing in Spanish with Ruiz and General Manager Juan Fra. I recognized the patron as one believed to be associated with patron Mauricio Pazos, who had been trespassed from the property earlier in the day. I informed the patron that he had to leave the property, at which point he exited the building without incident.

Signature: *Izaias Matos*

Date: 6/1/2022

EXHIBIT # 1  
PAGE # 2



**June 2, 2022**

**On Tuesday, March 22, 2022 at 7:40 p.m., a deck of cards was pulled from table 18 when the dealer noticed a bad card. The Floor person in charge, Josh Dinkel, while inspecting the deck, noticed all the high cards were marked on the sides. He left them on my desk with a note for my inspection the following day.**

**I reviewed the footage and took note of the players at the table when the deck was removed. Moments later, I noticed a player currently at a table who had also been at table 18 during the incident.**

**I advised my Floor staff (Dominick Biagi) to keep an eye on him. The Brush told us he was with a group of 4 guys that had just started coming in. We switched out the deck on his table and checked for markings. We found several, again, on the high cards only. We waited a while longer, then switched them out again. We got a noticeable reaction from him and another player at the table. We believe they were working together to mark the cards. We changed the deck again and this time found nothing out of order. They clearly knew we were watching them, as we did not try to conceal it. We also believed they were texting information back and forth. The youngest one was very nervous and constantly looking over his shoulder. This was the pattern for about an hour, until they all 4 left the room at the same time. While we could not get any hard evidence, we strongly suspected them of cheating.**

**They did not return until 2 months later.**

**On June 1, one of the offenders and 3 new faces came in together, 2 of them requesting to sit at the same table. Once again, a deck was pulled from a table (17) because of a bad card. While inspecting the deck, it became apparent that someone was marking the cards in the same manner as previously noted. Dominick informed me that one of the guys from that group was playing at table 29 and had also been playing the night before. We initiated the same actions as before, removing the decks and inspecting them. The same markings were on the cards.**

**I alerted the General Manager and after surveilling them for a while, he determined their actions were suspicious and warranted ejection.**

**EXHIBIT # 1  
PAGE # 3**

**At this point, Security got involved and ejected the primary suspect from the premises.**

EXHIBIT #  
PAGE #

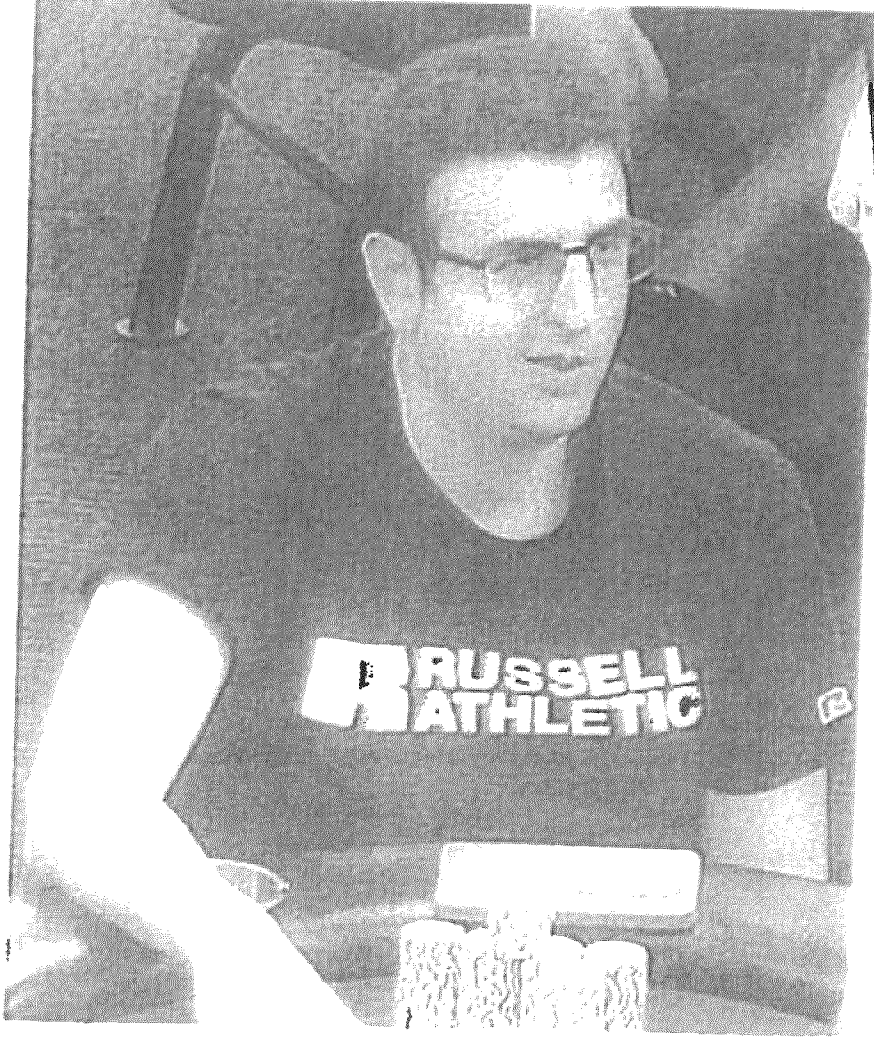
4



# INCIDENT REPORT CONTINUATION

Report #22-073

Mauricio Pazos



Signature: *K.C. Jones*

Date: 06-02-22

EXHIBIT # 1  
PAGE # 5



**FLORIDA**  
GAMING COM  
MISSIONS

**Division of Pari-Mutuel Wagering  
Investigations Section**

**PROPERTY RECEIPT**

Complaint # 2022 03 9095

Date 07/27/2022

Lab # \_\_\_\_\_

Item No.	Quantity	Description
1	1	BSPR Surveillance Thumb Drive (PAZOS)- 2022 03 9095) 6-1-2022.

<p>I hereby acknowledge that the above list represents all property taken from my possession and that I have received a copy of this receipt.</p> <p><i>Ken Jones, BSPR Security Director</i></p> <p>_____ Signature</p>	<p>I hereby acknowledge that the above list represents all property impounded by me in the official performance of duty as Investigator for the Division of Pari-Mutuel Wagering.</p> <p><i>Jan Viden</i></p> <p>_____ Signature – Impounding Investigator</p>
--	--

**RETURNED PROPERTY RECEIPT**

I hereby acknowledge the return to me, by the Division of Pari-Mutuel Wagering, the above listed property.

.....

Signature \_\_\_\_\_ Date \_\_\_\_\_

.....

Received by: \_\_\_\_\_ Date: \_\_\_\_\_  
 Received by: \_\_\_\_\_ Date: \_\_\_\_\_  
 Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Copies for: File, Transmittal, Laboratory, Property Receipt

EXHIBIT # 2  
PAGE # 1



**NOTICE OF EXCLUSION**

Incident Report # 22-073

Last Name <u>FAZOS</u>		First Name <u>MAURICIO</u>		MI
Address				
City		State	Zip	
Last 4 of SSN	Driver's License #	State	Expires	
DOB	Sex	Race	Hgt	Wgt

You have been ejected from the premises of the Bonita Springs Poker Room on 06-01-22 at 16:30 for MANAGEMENT DISCRETION

DATE TIME REASON

- This exclusion is
- Permanent (Class A)
  - Temporary, (Class B) the length of which is to be determined by the Exclusion Review Panel.
  - One (1) Year (Class C)

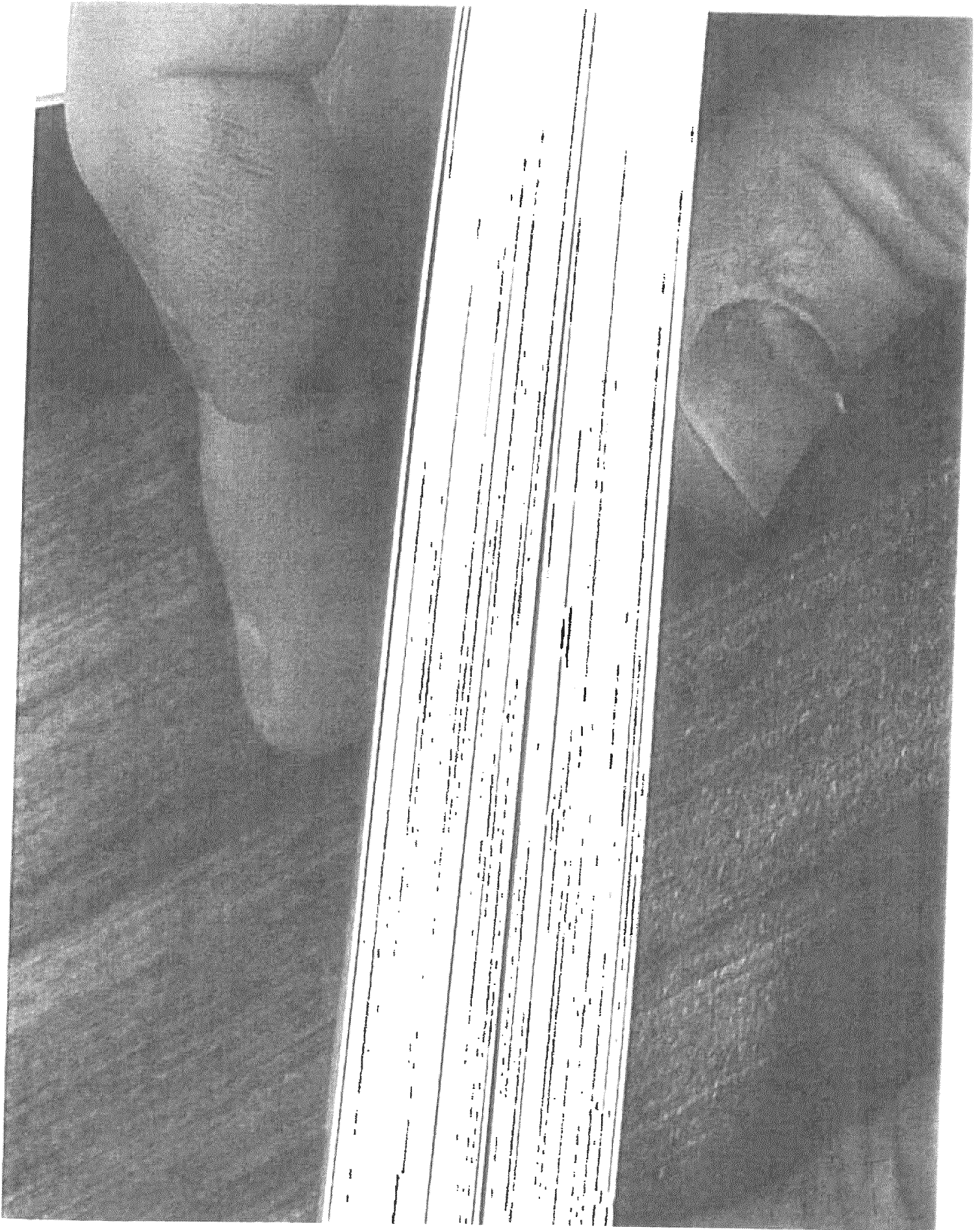
You are hereby ordered to leave the premises and are not to reenter until written permission is obtained by the Director of Security authorizing your return. If you are observed on the premises of the Bonita Springs Poker Room prior to being reinstated you are subject to prosecution for violation of applicable provisions of Florida State Statutes of Chapter 810 prohibiting Trespass. Denial of access complies with applicable laws and is not based on race, creed, color, sexual orientation, or national origin.

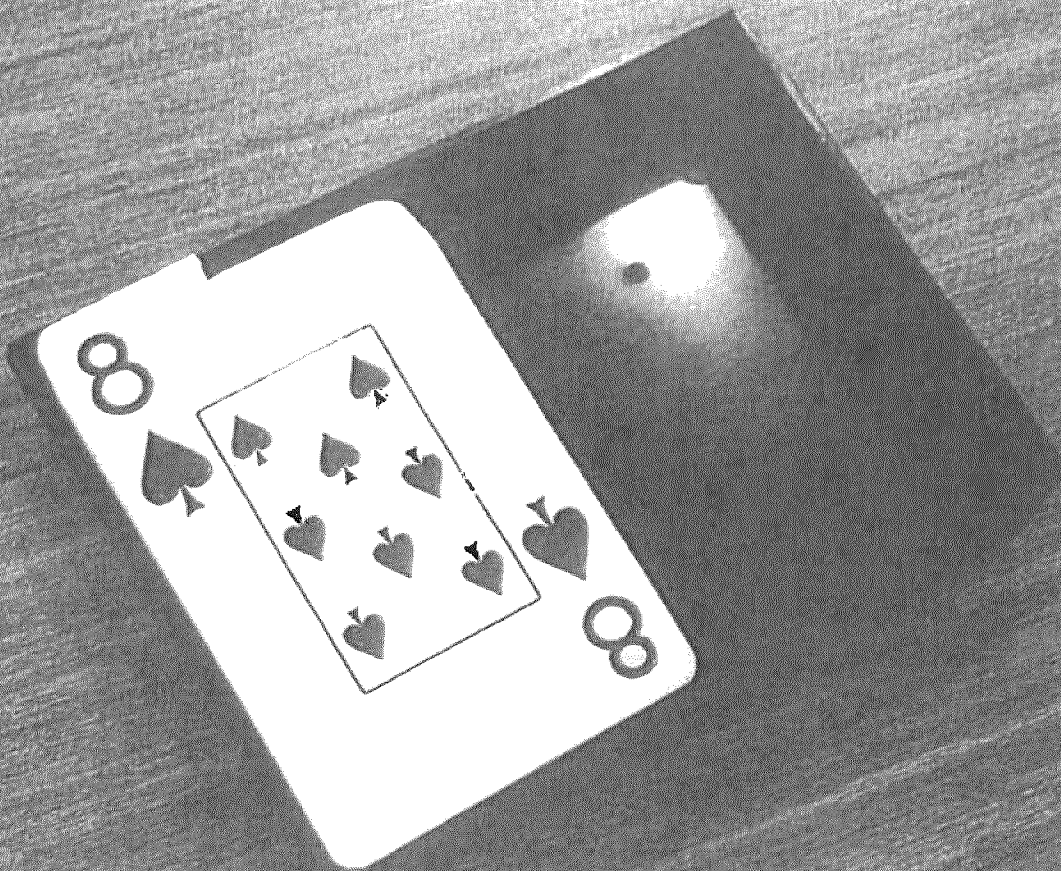
You may only appeal this decision and request reinstatement by contacting the Director of Security at (239)-949-3500

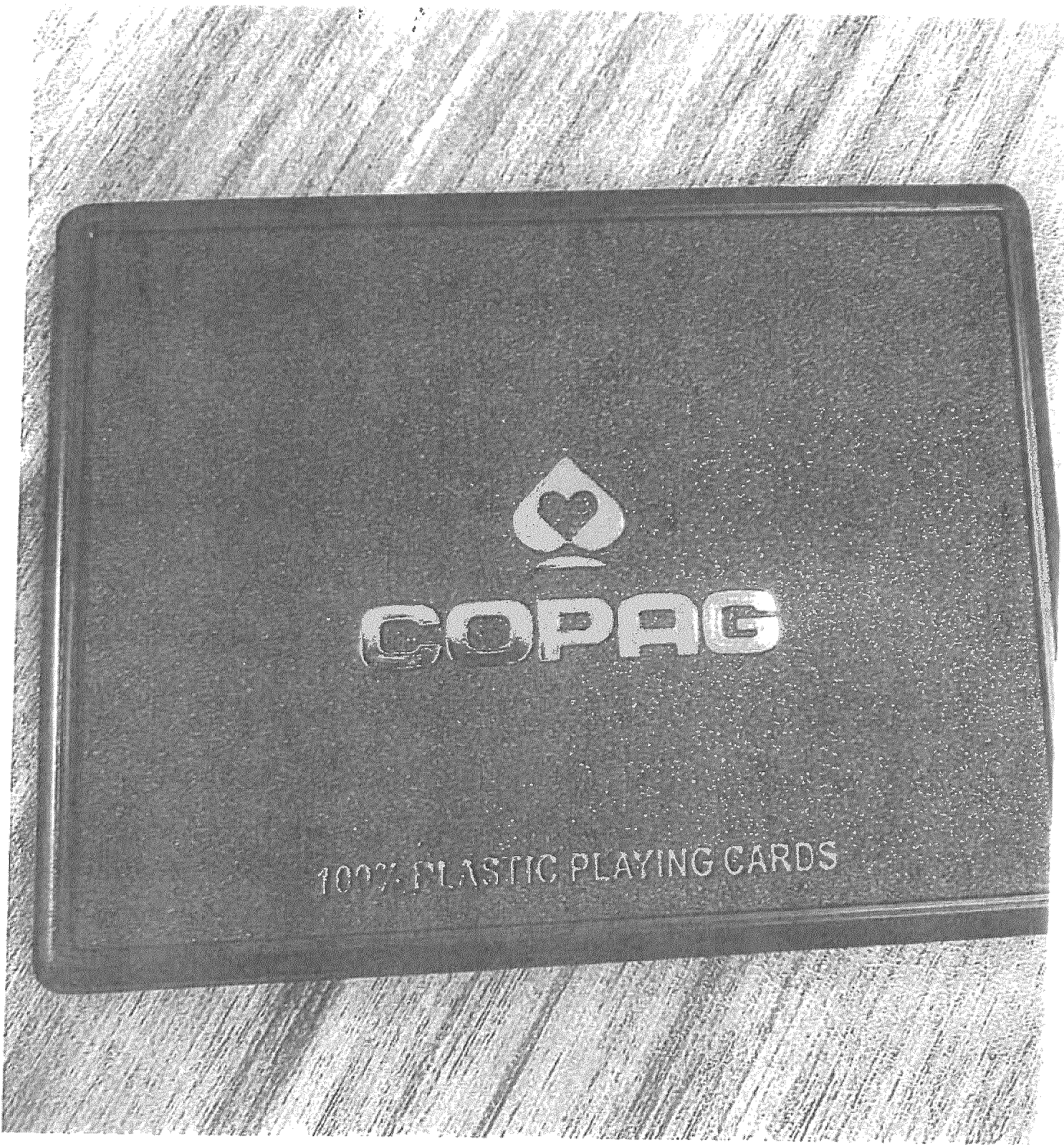
X \_\_\_\_\_  Refused

SIGNATURE

Position  
Dir. of Sec.









# Incident File Full Report



**ITrak Incident Reporting and Risk Management System Version  
2020.1.0.05202**

Incident Number: IN20220002674  
Date/Time Occurred: 6/ 6/2022 3:19:50 PM  
Day of Week: Monday  
Created by: kmejia

Printed By: kmejia

Printed On: 6/ 8/2022 at 12:10:38 PM

Print # 5  
Page 1

**Incident File Full Report**

**Incident File #N20220002674**

**Date/Time Occurred:** 6/ 6/2022 3:19:50 PM  
**Day of Week Occurred:** Monday  
**Date/Time Created:** 6/ 6/2022 5:50:00 PM  
**Date/Time Closed:**  
**Closed By:**

**Record Creation Details**  
**Department:** Security  
**Owner:** kmejia  
**Operator ID:** kmejia  
**Operator Name:**  
**Personnel ID:**  
**Card Number:**  
**Job Position**  
**Secondary Operator:**

**Location of Incident:**

**Property:** Magic City Casino  
**Location:** Poker Room  
**Sublocation:**

**Details of Incident:**

**Daily Log #:** DL20220020150  
**Incident Type:** Per Upper Management  
**Specific:** Permanent Excluded  
**Category:**  
**Risk Classification:**  
**Incident Status:** Open  
**Custom 3:**  
**Custom 4:**

**Synopsis:** On Monday June 6, 2022 approximately at 3:14 PM Poker Room Manager advised via E-mail of two male patrons needed to be excluded permanently as per upper management. Security Supervisor responded to the Poker Room and escorted two unidentified male patrons from Table 22 to the Security Vestibule. Security Supervisor alongside MPD explained the rules and regulations of Magic City Casino and advised both patrons that they were excluded permanently as per upper management. Both patrons acknowledged, but refused to sign the Trespass Warning form or have their picture taken. Both patrons left property shortly after.

**Checklist:**

**Narrative:**

Created On	Created By	Modified On	Modified By
6/ 6/2022 5:50:04 P	kmejia	6/ 6/2022 5:50:04 P	kmejia

On Monday June 6, 2022 approximately at 3:14 PM Poker Room Manager Iliana Irene Zamora (1018) advised via E-mail of two unidentified male patrons she wished to make a B.O.L.O. for to exclude permanently as per upper management. P.R.M. Zamora then advised at approximately 3:18 PM that she believed both patrons were currently in the Poker Room (Echo 1). Security Supervisor Kevin Mejia responded to

**Reporting Party:**

**Supervisor:**

**EXHIBIT #**  
**PAGE #** 5  
2

**Incident File Full Report**

**Incident File #IN20220002674**

the Poker Room and upon arrival approached two unidentified male patrons later identified as Mauricio Jose Pazos Fernandez and Alejandro Enrique Toledo Rincon at Table 22 and escorted them to the Security Vestibule. S.S. Mejia alongside MPD explained the rules and regulations of Magic City Casino and advised both patrons that they were excluded permanently as per upper management. Both patrons acknowledged that they were both permanently excluded but both refused to sign the Trespass Warning form. Mr. Toledo Rincon was particularly argumentative and refused to provide his ID as well. Both Mr. Toledo Rincon and Mr. Pazos Fernandez also declined to have their picture taken and left property shortly after. MPD was able to provide driver license information for Mr. Toledo Rincon as he drove off property in his vehicle. No further reports.

**Executive Brief:**

**Participants Involved:**

**Personnel**

Full Name: Property: Magic City Casino  
Role: Poker Room Manager Department: Poker  
Date Of Birth:

Full Name: Property: Magic City Casino  
Role: Security Supervisor Department: Security  
Date Of Birth:

**Subject**

Full Name: Company:  
Role: Patron  
Date Of Birth:  
Address:  
Contact Info:

Full Name: Pazos Fernandez, Mauricio Jose Company:  
Role: Patron  
Date Of Birth: 11/23/1981  
Address: N/A, N/A, N/A, Spain  
Contact Info:

**Ban/Watch Details**

Full Name Ban/Watch Start Date End Date  
Ban 6/ 6/2022 Permanent

Type Of Ban: Permanent Notes:

EXHIBIT # 5  
PAGE # 3

Reporting Party:

Supervisor:

**Incident File Full Report**

**Incident File #IN20220002674**

**Reason For Ban:** Per Upper Management

**Identification:** Driver License

Pazos Fernandez, Mauricio Ban  
Jose

6/ 6/2022

Permanent

**Type Of Ban:** Permanent

**Notes:**

**Reason For Ban:** Per Upper Management

**Identification:** Foreign Driver's License

**List of Attached Records:**

Record Type	Summary	Attached By	Date Attached
iDispatch	Dispatch#: DS20220003840 - Daily Log#: DL20220020150 - Call Time: 06/06/2022 15:19:50 - Dispatch Code: APPROACHING PATRON - Dispatch Subcode: - Dispatch Level: - Dispatch Emergency Type: - Property: Magic City Casino - Location: Poker Room - Dispatch Status: Cleared	kmejia	6/ 6/2022

EXHIBIT # 3  
PAGE # 4

Reporting Party:

Supervisor:

**Media Title**

**Original Filename**

Rincon (2).jpeg

**Date Attached**

6/6/2022 6:06:25 PM

**Attached By**

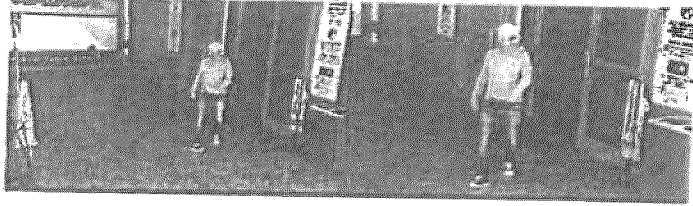
kmejia

**Type**

JPEG

**Size**

430399



**Media Title**

**Original Filename**

Rincon.png

**Date Attached**

6/6/2022 5:33:19 PM

**Attached By**

kmejia

**Type**

PNG

**Size**

192555



EXHIBIT # 5  
PAGE # 5

**Media Title**

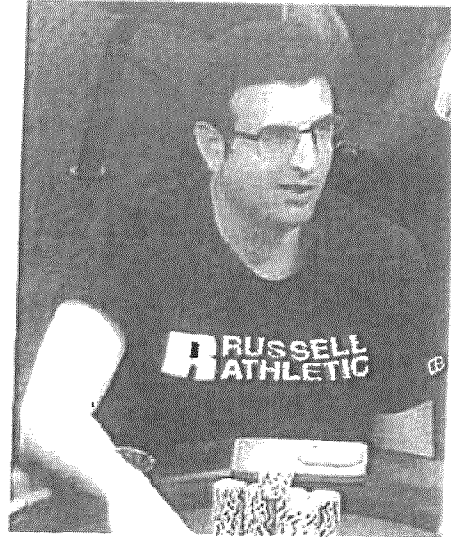
**Original Filename**  
Mauricio Jose Pazos  
Fernandez.bmp

**Date Attached**  
6/6/2022 5:38:15 PM

**Attached By**  
kmejia

**Type**  
BMP

**Size**  
1064398



**Media Title**

**Original Filename**  
Trespass Warning Form  
Mauricio Jose Pazos  
Fernandez.pdf

**Date Attached**  
6/6/2022 5:33:19 PM

**Attached By**  
kmejia

**Type**  
PDF

**Size**  
531444

EXHIBIT # 5  
PAGE # 6

**Media Title**

**Original Filename**

**Date Attached**

6/6/2022 5:38:15 PM

**Attached By**

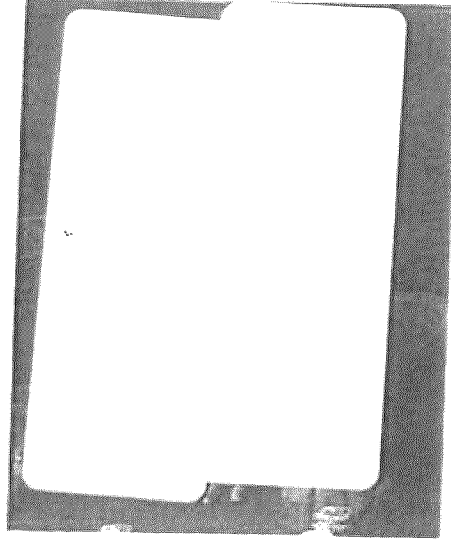
kmejia

**Type**

JPG

**Size**

80169



**Media Title**

**Original Filename**

Mauricio Jose Pazos  
Fernandez ID.jpg

**Date Attached**

6/6/2022 5:33:19 PM

**Attached By**

kmejia

**Type**

JPG

**Size**

189280

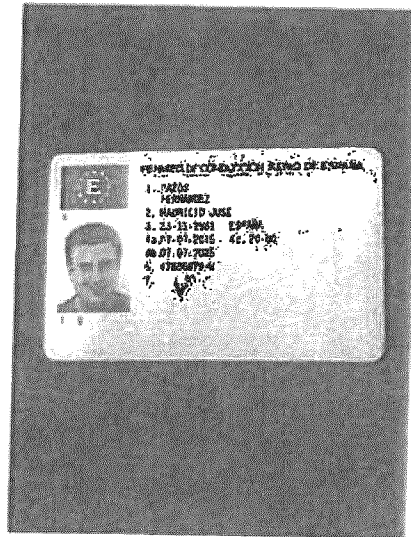


EXHIBIT # 5  
PAGE # 7

**Media Title**

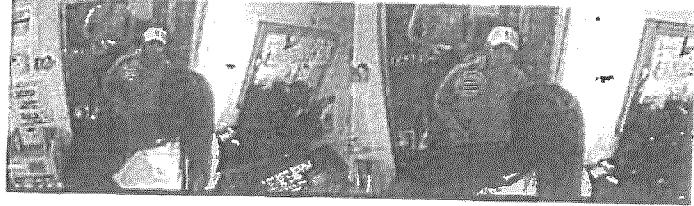
**Original Filename**

**Date Attached**  
6/6/2022 6:06:25 PM

**Attached By**  
kmejia

**Type**  
JPEG

**Size**  
502403



**Media Title**

**Original Filename**  
Trespass Warning Form

**Date Attached**  
6/6/2022 5:33:19 PM

**Attached By**  
kmejia

**Type**  
PDF

**Size**  
568787

EXHIBIT # 5  
PAGE # 8

8/8/2022 12:10:39 PM

Page 4/6



**Media Title**

**Original Filename**  
B.O.L.O. As Per Upper  
Management.pdf

**Date Attached**  
6/6/2022 5:38:15 PM

**Attached By**  
kmejia

**Type**  
PDF

**Size**  
488285

**Media Title**

**Original Filename**  
Mauricio Jose Pazos  
Fernandez (3).jpeg

**Date Attached**  
6/6/2022 6:08:25 PM

**Attached By**  
kmejia

**Type**  
JPEG

**Size**  
190520



EXHIBIT # 5  
PAGE # 9

**Media Title**

**Original Filename**  
Mauricio Jose Pazos  
Fernandez (2).jpeg

**Date Attached**  
6/6/2022 6:06:25 PM

**Attached By**  
kmejia

**Type**  
JPEG

**Size**  
461970

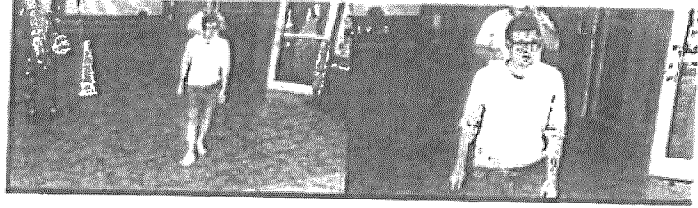


EXHIBIT # 5  
PAGE # 10

FAQ | Help | Sign Out

VR Home | Inbox | Entity | Application | License | Cash | Exam | Inspection | Enforcement | Report

Complaint Search Update | Change Recording License Type | Mass Status Update | Delete Complaint | Public Case Info | Mass Activity Update | Mass Discipline

Domain: 10 - Division of Pari-Mutuel Wagering

Logged in as: imuniz

VR Home > Complaint Search > Maintain Complaint

Lic Type	1098 - Unlicensed Complaints	Status	20 Under Investigation	Status Date	08/11/2022
Complaint #	2022039095	Case Type	CMP - Complaint	Disposition	Disposition Date
Docket#	Respondent	PAZOS, MAURICIO	Responsible	Ivita - VILA, LISA	Private Case

Complaint | Respondent | Complainant | Add'l Info

Source	INTN - Internal	Security Level	1	<input type="checkbox"/> Parties	<input checked="" type="checkbox"/> Activities
Form	INTR - Internal	Priority			
Class'n	V-C - Cardroom Violations	Complexity	R - Regular	<input checked="" type="checkbox"/> Allegations	<input type="checkbox"/> Discipline
Security	STND - Standard	Incident	06/01/2022	<input type="checkbox"/> Violations	<input type="checkbox"/> Compliance
Region	SR - Southern Region	Received	08/11/2022		
Reference	550.0251(6) & 61D-11.005(4)			<input checked="" type="checkbox"/> Related	<input checked="" type="checkbox"/> Disposition
Entered	08/11/2022	Entered By	Imuniz	<input type="checkbox"/> Inspection	
Summary	142-Bonita-Fort Myers Corporation --- / --- . Prohibitions & The powers and duties of the Florida Division of Pari-mutuel Wagering of the Florida Gaming Control Commission: On June 1, 2022, PAZOS was observed by Bonita Springs Poker Room (BSPR) Surveillance and Poker room Staff, marking cards and signaling to another player (Alejanor TOLEDO) during a poker game by indenting the edges on high ranking cards (Queen, King, Ace) in order to gain an advantage over other players. BSPR, has indicated that both PAZOS and TOLEDO have been permanently excluded from that facility.				<input type="checkbox"/> Costs <input type="checkbox"/> Time Tracking <input type="checkbox"/> Attachments <input type="checkbox"/> Work Notes
Updated	08/11/2022 11:30:16	By	Imuniz	<input type="checkbox"/> Auto Assign	<input type="checkbox"/> History <input type="checkbox"/> Print Report

Change | Save | OK | Cancel | Back

Get Adobe Reader.

EXHIBIT # 6  
PAGE # 1

FAQ | Help | Sign Out

VR Home | Inbox | Entity | Application | License | Cash | Exam | Inspection | Enforcement | Report

Complaint Search | Change Recording License Type | Delete Complaint | Mass Activity Update | Mass Discipline  
Update | Mass Status Update | Public Case Info

Domain 10 - Division of Pari-Mutuel Wagering

Logged in as: Imuniz

VR Home > Complaint Search > Maintain Complaint

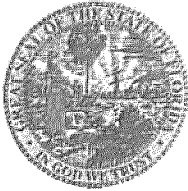
Lic Type	1098 - Unlicensed Complaints	Status	20 Under Investigation	Status Date	08/11/2022
Complaint #	2022039095	Case Type	CMP - Complaint	Disposition	Disposition Date
Docket#	Respondent	PAZOS, MAURICIO	Responsible	Ivila - VILA, LISA	Private Case

Complaint | Respondent | Complainant | Add'l Info

Source	INTN - Internal	Security Level	1	<input type="checkbox"/> Parties	<input checked="" type="checkbox"/> Activities
Form	INTR - Internal	Priority		<input checked="" type="checkbox"/> Allegations	<input type="checkbox"/> Discipline
Class'n	V-C - Cardroom Violations	Complexity	R - Regular	<input type="checkbox"/> Violations	<input type="checkbox"/> Compliance
Security	STND - Standard	Incident	06/01/2022	<input checked="" type="checkbox"/> Related	<input checked="" type="checkbox"/> Disposition
Region	SR - Southern Region	Received	08/11/2022	<input type="checkbox"/> Inspection	
Reference	550.0251(6) & 61D-11.005(4)			<input type="checkbox"/> Costs	
Entered	08/11/2022	Entered By	Imuniz	<input type="checkbox"/> Time Tracking	<input type="checkbox"/> Auto Assign
Summary	142-Bonita-Fort Myers Corporation ----- / ----- . Prohibitions & The powers and duties of the Florida Division of Pari-mutuel Wagering of the Florida Gaming Control Commission: On June 1, 2022, PAZOS was observed by Bonita Springs Poker Room (BSPR) Surveillance and Poker room Staff, marking cards and signaling to another player (Alejanor TOLEDO) during a poker game by indenting the edges on high ranking cards (Queen, King, Ace) in order to gain an advantage over other players. BSPR, has indicated that both PAZOS and TOLEDO have been permanently excluded from that facility.			<input type="checkbox"/> Attachments	<input type="checkbox"/> History
Updated	08/11/2022 11:30:16	By	Imuniz	<input type="checkbox"/> Work Notes	<input type="checkbox"/> Print Report

Change | Save | OK | Cancel | Back

Get Adobe Reader.



STATE OF FLORIDA  
 FLORIDA GAMING CONTROL COMMISSION  
 DIVISION OF PARI-MUTUEL WAGERING

**OPEN CASE REQUEST**

(OTHER THAN THOSE SPECIFIED IN SECTION 120.60(4)(a), F.S.)

INCIDENT DATE: June 1, 2022

PMW     Cardroom     Slot

Violation     Incident     Complaint

FACILITY NAME: Bonita Fort Myers Corporation    LIC #: 142

**RESPONDENT**

NAME: Mauricio Pazos  
 Address: 1235 Fairlake Trace # 503, Weston, FL 33326    Tel #:  
 LIC #: N/A    LIC TYPE: 1098    OCCUPATION:

**COMPLAINANT**

NAME:    Tel #:  
 Address:  
 LIC #:    LIC TYPE:    OCCUPATION:

**VIOLATION(S) / TITLE(S):** F.S. 550.0251 The powers and duties of the Florida Division of Pari-mutuel Wagering of the Florida Gaming Control Commission.

**DESCRIPTION: 61D-11.005 Prohibitions**

**SPECIFIC RULE: 550.0251(6)** In addition to the power to exclude certain persons from any pari-mutuel facility in this state, the division may exclude any person from any and all pari-mutuel facilities in this state for conduct that would constitute, if the person were a licensee, a violation of this chapter or the rules of the division. The Commission may exclude from any pari-mutuel facility within this state any person who has been ejected from a pari-mutuel facility in this state or who has been excluded from any pari-mutuel facility in another state by the governmental department, agency.

**61D-11.005(4) Prohibitions**

No person shall, either directly or indirectly:

- (a) Employ or attempt to employ any device, scheme, or artifice to defraud any participant in a game or the cardroom operator.
- (b) Engage in any act, practice, or course of operation that would constitute a fraud or deceit upon any participant in a game or the cardroom operator.
- (c) Engage in any act, practice, or course of operation with the intent of cheating any participant or the cardroom operator.

**DESCRIPTION:** On June 1, 2022, **PAZOS** was observed by Bonita Springs Poker Room (BSPR) Surveillance and Poker room Staff, marking cards and signaling to another player (**Alejanor TOLEDO**) during a poker game by indenting the edges on high ranking cards (Queen, King, Ace) in order to gain an advantage over other players. BSPR, has indicated that both **PAZOS** and **TOLEDO** have been permanently excluded from that facility.

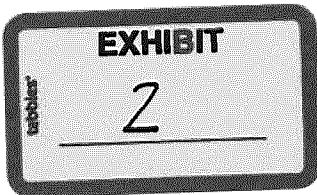
**CASE DETAILS FILED BY:**

Chief Inspector     Judge/Steward     Investigator     Other: \_\_\_\_\_  
(Title of State Employee)

Lisa Vila  
 (Print Name)

*Lisa Vila*  
 (Signature)

July 29, 2022  
 (Date)



7020 2450 0000 5076 4025

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

For delivery information, visit our website at [www.usps.com](http://www.usps.com)™

**OFFICIAL USE**

Certified Mail Fee \$

**EXTRA SERVICES & FEES** (check box, and fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage \$

**Total Post** \$

Sent To \$

Street and

City, State,

**Mauricio Pazos**  
400 Southwest 1st Avenue, Apt#404  
Fort Lauderdale, Florida 33301  
AC - 2022039095 - PMW

Postmark Here

10-19-22

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

Tracking Number:

**70202450000050964015**

[Copy](#)   [Add to Informed Delivery](#)  
(<https://informedelivery.usps.com/>)

Remove X

Feedback

## Latest Update

Your item was delivered to an individual at the address at 5:30 pm on October 24, 2022 in FORT LAUDERDALE, FL 33301.

### Delivered

**Delivered, Left with Individual**  
FORT LAUDERDALE, FL 33301  
October 24, 2022, 5:30 pm

[See All Tracking History](#)

---

**Text & Email Updates**



---

**USPS Tracking Plus®**

