

**FILED**  
Department of Business and Professional Regulation  
Deputy Agency Clerk  
CLERK Brandon Nichols  
Date 12/5/2018  
File # 2018-09757

STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION  
DIVISION OF PARI-MUTUEL WAGERING

DEPARTMENT OF BUSINESS AND  
PROFESSIONAL REGULATION,  
DIVISION OF PARI-MUTUEL WAGERING,

Petitioner,

DBPR Case No. 2018-001104

vs.

REYNOLDS SUAREZ,

Respondent.

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STIPULATION AND CONSENT ORDER

The Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering ("Division"), and Reynolds Suarez ("Respondent") hereby stipulate and agree to the following terms and issuance of this Consent Order.

1. At all times material hereto, Respondent was a patron of Hialeah Park Racing and Casino ("Hialeah").
2. This Stipulation and Consent Order is to be entered in resolution of the three-count Administrative Complaint filed in DBPR Case No. 2018-001104, alleging that, on or about December 28, 2017, Respondent (1) was observed attempting to manipulate the outcome of a slot machine and (2) permanently trespassed by Hialeah.

STIPULATION

WHEREAS the parties desire to resolve this matter, the following terms are stipulated:

3. The Division has jurisdiction over this matter and the parties.
4. The Division is authorized by section 120.57, Florida Statutes, to resolve administrative proceedings by Consent Order.



5. Each party has entered into the terms of this Consent Order voluntarily. Respondent is aware that he is entitled to the advice of counsel. Respondent has either sought the advice of counsel or by execution of this Consent Order is knowingly waiving the opportunity to seek advice of counsel. Respondent acknowledges that the Division has not made any promise nor has it in any other way encouraged Respondent to enter into this Consent Order without the advice of counsel.

6. This Consent Order is enforceable under section 120.69 and chapter 550, Florida Statutes, as final agency action.

7. Each party shall bear its own costs and legal fees related to this matter, and no financial claim shall be made against the Division in this action.

8. Respondent and the Division acknowledge and agree that this Consent Order and contained stipulation constitute the Final Order of the Division respecting the matters set forth above and that further administrative and judicial review is hereby waived by both parties.

9. Respondent and the Division fully understand that this Consent Order will in no way preclude additional proceedings by the Division against Respondent for acts or omissions not specifically set forth herein.

10. Respondent neither admits nor denies committing the violation set forth in this Consent Order, but this Consent Order and the violation(s) addressed hereby may be considered in aggravation of any future disciplinary proceedings involving Respondent.

11. EXCLUSION: In consideration of the Division not pursuing any fine or monetary penalty for the violations alleged in the Administrative Complaint filed and served in this matter, Respondent agrees to be **INDEFINITELY EXCLUDED** from all licensed pari-mutuel and slot facilities in the State of Florida.

A handwritten signature in black ink, appearing to be the initials 'JP' with a flourish, located in the bottom right corner of the page.

12. The Consent Order shall be mailed to: **ATTENTION: Patricia Broadway, Department of Business and Professional Regulation, Office of the General Counsel, 2601 Blair Stone Road, Tallahassee, Florida 32399-2202.** Please note DBPR Case No. 2018-01104 on the face of the check.

13. It is expressly understood that this Stipulation is subject to the approval of the Deputy Director of the Division of Pari-Mutuel Wagering ("Director"). In this regard, the Stipulation shall have no force and effect unless this Consent Order, incorporating the terms of this Stipulation, is signed by both parties. Should this Consent Order be rejected, no statement made in furtherance of it by Respondent may be used as direct evidence against Respondent in any proceeding.

14. Upon the Division's adoption of this Consent Order, Respondent expressly waives all further procedural steps, including all rights to seek judicial review of this Consent Order and the matters addressed hereby. Upon the Division's adoption of this Consent Order, Respondent waives the right to seek any attorney's fees or costs from the Department in connection with this proceeding.

15. This Stipulation and Consent Order is executed by both parties for the purpose of avoiding further administrative action with respect to the matters addressed hereby. In this regard, Respondent authorizes the Director to review and examine all materials concerning Respondent prior to or in conjunction with consideration of the Stipulation. Should this Stipulation not be accepted by the Director, it is agreed that presentation to and consideration of this Consent Order and other documents and matters by the Director shall not unfairly or illegally prejudice the Director from further participation, consideration, or resolution of these proceedings.

Respondent, REYNOLDS SUAREZ, hereby agrees and consents to the terms and conditions of this Stipulation and Consent Order this 16<sup>th</sup> day of Nov, 2018.

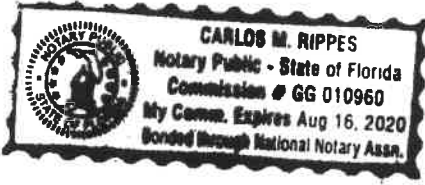
[Signature]  
**REYNOLDS SUAREZ**  
Respondent

STATE OF Florida  
COUNTY OF Miami Dade


Sworn to (or affirmed) and subscribed before me this 16 day of Nov, 2018, by Reynolds Suarez, who is personally known to me or who produced the following as identification: FL driver's Lic. expires

11-10-2025,

[Signature]  
Notary Public  
My Commission Expires:



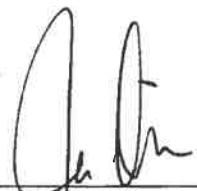
APPROVED for legal sufficiency this 4 day of December, 2018.

  
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**LOUIS TROMBETTA**  
Chief Attorney  
Division of Pari-Mutuel Wagering  
Department of Business and  
Professional Regulation

**ORDER**

The foregoing Consent Order shall constitute the agreed resolution of this matter and the Final Order of the Division in DBPR Case No. 2018-001104 once it is filed with the Agency Clerk of the Department of Business and Professional Regulation.

DONE AND ORDERED this 4 day of December, 2018, in Tallahassee, Florida.

  
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**JOE DILLMORE, DEPUTY DIRECTOR**  
Division of Pari-Mutuel Wagering  
Department of Business and Professional Regulation  
2601 Blair Stone Road  
Tallahassee, Florida 32399-2202

CERTIFICATE OF SERVICE

I hereby certify this 5<sup>th</sup> day of December, 2018, that a true copy of

the foregoing has been furnished by regular U.S. Mail and electronic mail to:

Reynolds Suarez  
c/o Carlos Rippes, Esq.  
The Law Firm of Carlos Rippes  
24 E. 5<sup>th</sup> Street, Suite 2-E  
Hialeah, Florida 33010  
Rippeslaw@gmail.com

*Brandon M. Nichols*

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**AGENCY CLERK'S OFFICE**  
Department of Business and Professional Regulation

**Copies to:**

Deborah Matthews, AAI OGC/PMW  
Glenda Ricks, Chief of Operations PMW