

Mailing Date: JUL 08 2014

[Appeal](#)

COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ADMINISTRATIVE LAW JUDGE
FOR THE
PENNSYLVANIA LIQUOR CONTROL BOARD

PENNSYLVANIA STATE POLICE,	:	In Re Citation No.: 13-1786
BUREAU OF LIQUOR CONTROL	:	
ENFORCEMENT (BLCE)	:	BLCE Incident No.: W03-459301
	:	
v.	:	PLCB LID No.: 2438
	:	
NEW OXFORD SOCIAL & ATHLETIC CLUB	:	PLCB License No.: CC-5284
200 W. GOLDEN LANE	:	
PO BOX 55	:	SGOC License No.: 13-44
NEW OXFORD, PA 17350-1310	:	

ADJUDICATION

BEFORE: Felix Thau, Administrative Law Judge

FOR BLCE: John H. Pietrzak, Esquire

LICENSEE: Jeffrey Topper, President

BACKGROUND:

This proceeding arises out of a citation, containing six counts, that was issued on August 23, 2013, by the Bureau of Liquor Control Enforcement of the Pennsylvania State Police (Bureau) against New Oxford Social & Athletic Club (Licensee).

First Cause of Action: Local Option Small Games of Chance Act Violations

The first count charges Licensee with violations of Section 328.302(b) of the Local Option Small Games of Chance Act [10 P.S. §328.302(b)]. The charge is that Licensee, by your servants, agents, or employees, awarded more than \$25,000.00 in prizes in any seven-day period, during the periods August 19 through 25, September 9 through 15, October 14 through 20, November 11 through 17, December 9 through 15, 2012; January 13 through 19, February 3 through 9, March 17 through 23, and March 31 through April 6, 2013.

The second count charges Licensee with a violation of Section 901.731 of the Department of Revenue Regulations [61 Pa. Code §901.731]. The charge is that Licensee, by your servants, agents, or employees, failed to operate Small Games of Chance in conformity with the Small Games of Chance Act and Title 61 of the Pennsylvania Code, during the period January 4 through April 17, 2013.

The third count charges Licensee with a violation of Section 328.502(a) of the Local Option Small Games of Chance Act [10 P.S. §328.502(a)] and Section 901 of the Department of Revenue Regulations [61 Pa. Code §901]. The charge is that Licensee, by your servants, agents, or employees, used funds derived from the operation of games of chance for purposes other than those authorized by law, during the period January 8 through May 7, 2013.

The fourth count charges Licensee with a violation of Section 328.503 of the Local Option Small Games of Chance Act [10 P.S. §328.503] and Section 901 of the Department of Revenue Regulations [61 Pa. Code §901]. The charge is that Licensee, by your servants, agents, or employees, failed to maintain complete and truthful records covering the operation of the licensed business for a period of two (2) years immediately preceding May 13, 2013, concerning the Local Option Small Games of Chance Act.

Second Cause of Action: Liquor Code Violations

The fifth count charges Licensee with a violation of Section 471 of the Liquor Code [47 P.S. §4-471], Section 328.502(a) of the Local Option Small Games of Chance Act [10 P.S. §328.502(a)] and Section 901 of the Department of Revenue Regulations [61 Pa. Code §901]. The charge is that Licensee, by your servants, agents, or employees, used funds derived from the operation of games of chance for purposes other than those authorized by law, during the period January 8 through May 7, 2013.

The sixth count charges Licensee with a violation of Sections 471 and 493(12) of the Liquor Code [47 P.S. §§4-471 and 4-493(12)], Section 328.503 of the Local Option Small Games of Chance Act [10 P.S. §328.503] and Section 901 of the Department of Revenue Regulations [61 Pa. Code §901]. The charge is that Licensee, by your servants, agents, or employees, failed to maintain complete and truthful records covering the operation of the licensed business for a period of two (2) years immediately preceding May 13, 2013, concerning the Local Option Small Games of Chance Act.

I presided at an evidentiary hearing on May 20, 2014 at 2221 Paxton Church Road, Harrisburg, Pennsylvania. The matter was submitted by way of agreement of facts.

Therefore, I make the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT:

1. The Bureau began its investigation on March 28, 2013 and completed it on July 29, 2013. (Commonwealth Exhibit No. C-1)

2. The Bureau sent a notice of the alleged violations to Licensee at the licensed premises by certified mail, return receipt requested, on August 14, 2013. The notice alleged violations of four of the six charges in the citation. (Commonwealth Exhibit No. C-1, N.T. 6)

First Cause of Action: Local Option Small Games of Chance Act Violations

Count No. 1

1. During the seven days period ending as indicated below, Licensee paid out the amounts listed pursuant to its Small Games of Chance license. (N.T. 20-50)

<u>Seven Day's Accounting Period Ending</u>	<u>SGOC Payout Amount</u>
a. August 25, 2012	\$38,027.00
b. September 15, 2012	\$44,536.00
c. October 20, 2012	\$45,247.00
d. November 17, 2012	\$43,482.00
e. December 15, 2012	\$39,312.00
f. January 19, 2013	\$41,678.00
g. February 9, 2013	\$38,350.00

- | | |
|-------------------|-------------|
| h. March 23, 2013 | \$66,893.00 |
| i. April 6, 2013 | \$50,103.00 |

Count No. 2

2. During the period charged, Licensee permitted a pull-tab game to be played which was not approved by the Department of Revenue. (N.T. 51-55)

Count No. 3

3. During the period charged, Licensee placed a game of chance into play for which no independent records were kept. All proceeds derived from this game were used to pay employees' salary, in cash. (N.T. 55-56)

Count No. 4

4. Licensee kept no records for the game of chance, identified in Count No. 3 above. Licensee was also not keeping the serial number of some other games. (N.T. 69-71)

Second Cause of Action: Liquor Code Violations

Count No. 5

5. Finding of Fact No. 3 is incorporated by reference as is fully set forth herein.

Count No. 6

6. Finding of Fact No. 4 is incorporated by reference as is fully set forth herein.

CONCLUSION(S) OF LAW:

1. The Bureau has complied with the applicable notice requirements of Liquor Code Section 471 [47 P.S. §4-471], as incorporated by reference in the Local Option Small Games of Chance Act [10 P.S. §702(b)], with respect to Count Nos. 1 through 4.

2. The Bureau has failed to comply with the notice requirements of Liquor Code Section 471 [47 P.S. §4-471], with respect to Count Nos. 5 and 6, as described in Section B of the Discussion.

3. Count No. 1 is sustained as charged.

4. Count No. 2 is dismissed as described in Sections F and G of the Discussion.
5. Count No. 3 is sustained as a violation of [10 P.S. §328.502(b)(1)].
6. Count No. 4 is sustained as a violation of [10 P.S. §328.503; 60 Pa. Code §§901.461; 462; 463; 465, and 466].
7. Count Nos. 5 and 6 are dismissed for the reasons expressed in Sections B and H of the Discussion.

DISCUSSION:

A. Introduction

This matter was initially submitted by way of Licensee's completing an Admission, Waiver, and Authorization. After reviewing the record and the law, I concluded that rendering an Adjudication without a hearing was a mistake, particularly because the significant changes to the Small Games of Chance Act, by virtue of Act 2 of 2012, presented significant questions of first impression.

Occasionally and for humor, I have been heard to remark that every time the Legislature sneezes, there is money to be made for lawyers. In this fashion, the nomenclature of legislative enactments may be modified. For example, Act 2 of 2012 may be classified as Be Kind To Lawyers Act 2 of 2012.

This levity is not intended to disparage the General Assembly. Rather, it serves to underscore the reality that writing laws with clarity, precision, and applicability to yet to be applied and unknown future circumstances is virtually impossible. Those who must apply a new law are tasked with building a structure, with instructions that assume they come to the assignment already owning much skill.

B. The Thirty Days Letter Is Defective As It Relates To Counts No. 5 And No. 6 (Commonwealth Exhibit No. C-1)

It is well established that a failure to comply with Liquor Code Section 471(b), as it relates to providing notice within thirty days of investigation completion, is a mandatory Bureau responsibility leading to citation dismissal if not fully complied with [PLCB v. Greenspan, 246 A.2d 433 (Pa.Super. 1968); BLCE v. Beverly H. Batchler, In Re Citation No.: 05-1518].

It is equally accurate to say, the notice need not specify a violation date [BLCE v. Franklin House Tavern, Inc., In Re Citation No.: 04-0028]. Further, the scope of the notice limits the Bureau's ability to amend a citation; it is a specification in addition to fair warning as required by Due Process/Notice [BLCE v. All American Rathskeller, Inc., In Re Citation No.: 89-1082].

The Bureau has cleverly fashioned a new citation model in which a charge is categorized into a Cause of Action so that a citation comports with both the Liquor Code and Act 2 of 2012. This citation format is highly effective in classifying the nature of alleged unlawful conduct.

What this new framework brings to light is the inadequacy of the notice of alleged violation in question. It alleges four violations, none of which is identified as a Liquor Code or Small Games of Chance violation. This failure renders the notice defective as it relates to Counts No. 5 and No. 6, thus requiring dismissal.¹

C. The Bureau Is Required To Notify A Licensee Of Small Games Of Chance Violations Within Thirty Days Of Investigation Completion

This conclusion is one, thankfully, for which the Bureau and I agree. The legislative instruction manual (Act 2 of 2012) provides no direct guidance. The Act does state that the Bureau may enforce the Small Games of Chance Act through Liquor Code Section 212 [47 P.S. §2-212], relating to the Office of Administrative Law Judge [10 P.S. §328.702]. In full agreement with the Bureau, I conclude it was the Legislature's intent to incorporate by reference the procedural components of the Liquor Code citation process so long as they do not contradict the Small Games of Chance Act.

D. Count No. 2 Cannot Be Sustained Because There Are No Facts Of Record To Support The Bureau's Legal Theory

By letter/brief of June 24, 2014, Bureau counsel posits a number of distinct statutes and regulations which Licensee is alleged to have violated. Regrettably for the Bureau, the letter/brief is replete with facts not of record.

The colloquy concerning Count No. 2 begins at N.T. 51. There, Bureau counsel asserts that Licensee placed an unapproved pull-tab game into play (N.T. 51-52). Although never controlling, as more fully discussed in Section G, there is nothing in the referenced regulation of Count No. 2 that speaks to the question [61 Pa. Code §901.731] (N.T. 52-55).

¹ Some might argue the entire notice of alleged violations is defective therefore warranting dismissal of all charges.

Counsel has not pointed to any provision of law or regulation which directly renders it unlawful for a licensee to place into play an unapproved pull-tab game; there is nothing that directly mandates the Pennsylvania Department of Revenue issue formal approval of a pull-tab game.

E. The Provisions Of Act 2 Of 2012 Are Not Retroactive

Licensee has an Adjudication history which includes violations of the Small Games of Chance Act. These Adjudications pre-date Act 2 of 2012. The question arises whether these priors may be included in determining whether a violation of the Small Games of Chance Act occurring after the effective date of Act 2 of 2012 can cause the Bureau to seek sanction via the Liquor Code. There need be no lengthy retroactivity analysis as I and the Bureau agree; Small Games of Chance violations pre-dating Act 2 of 2012 are not to be counted for purposes of implicating Liquor Code violations.

F. The Wording Of Count No. 2 Offends Due Process/Notice

It is beyond any reasonable dispute that an administrative agency's notice of possible sanction, for purposes of procedural Due Process/Notice, minimally requires that the notice contain a sufficient listing and explanation of the charges against that individual [Charter School v. Pocono Mt. School Dist., 88 A.3d 275 (Pa.Cmwlt. 2014)]. Due Process/Notice mandates an opportunity to confront and cross-examine witnesses [SOJA v. Pennsylvania State Police, 455 A.2d 613 (Pa. 1982)]. A defending party cannot cross-examine and present witnesses without some understanding of that which the party is alleged to have done contrary to law.

A liquor license is of the kind that cannot be penalized arbitrarily or without just cause [Redevelopment Auth. of City of Phila. v. Lieberman, 336 A.2d 249 (Pa. 1975); PLCB v. Leonardziak, 233 A.2d 606 (Pa.Super. 1967)]. While the Bureau enjoys wide latitude in the generality of its charges, minimum Due Process/Notice must contain a description of the date and nature of the alleged unlawful misconduct [PLCB v. Reda, 463 A.2d 108 (Pa.Cmwlt. 1983)].

A close inspection of Count No. 2's wording leads to the conclusion that no unlawful conduct has actually been described, even in the most general of manners. The wording of Count No. 2 is actually a conclusion of law.

Only the irrational would dare suggest that a charge alleging that a licensee failed to operate in conformity with the Liquor Code or the Crimes Code would pass constitutional muster. Count No. 2 is precisely of the same variety.

Let no one be misled by the quantitative argument that the Small Games of Chance Act is substantially less complicated than the Liquor Code thereby transforming a general description sufficiently specific. Due Process/Notice is not compromised or altered by the ratio of unlawful behaviors in one body of law in relationship to another. The test is whether the notice advises a party of how and when the alleged unlawful conduct occurred.

G. A Charge's Statutory Reference, Whether Accurate Or Not, Is Not A Due Process/Notice Component And Is Never Controlling

Since the question was first brought to my attention, I have consistently maintained that statutory references included in a charge have no weight whatsoever. In addition to my reasoning in *BLCE v. All American Rathskeller, Inc.* (supra), the regulation defining a citation's content states that a citation include no more than a brief description of the types and dates of alleged violations [40 Pa. Code §15.41]. The regulation does not mandate a specification as to the precise law in question.

The Bureau is in a bit of a pickle should it attempt to argue the statutory reference, when combined with a charge's wording, is an essential element of Due Process/Notice thereby transforming an otherwise inadequate notice to one that passes the test. Given some of the non-specific and inaccurate references to law and regulation in the instant citation, the Bureau would be hard pressed to push the point.²

The statutory reference in Count No. 1 is accurate. Since Count No. 2 cannot be sustained, any analysis of its statutory reference is fruitless. Counts No. 3 and 4 both include a reference to 61 Pa. Code §901. There is no such substantive regulation. Section 901 is a Chapter division entitled, Local Option Small Games of Chance, and a sub-section of Part VII of the Department of Revenue regulations, also entitled Local Option Small Games of Chance. It is a meaningless entry, providing no guidance as to what regulation was offended.

The reference in Count No. 3 to 10 P.S. §328.502(a) is also off target. Under the heading of, Distribution of proceeds, provides:

- (a) Distribution – The proceeds from games of chance received by a club licensee shall be distributed as follows:
 - (1) No less than 70% of the proceeds shall be paid to organizations for public interest purposes in the calendar year in which the proceeds were obtained.

² See *BLCE v. All American Rathskeller, Inc.* (supra) for a pertinent discussion with guidance from several Adjudications.

The Bureau suggests this ratio must be applied to the proceeds of every game of chance, so that the game for which all proceeds were dedicated to salaries is unlawful. I was incredulous when I heard the argument at the hearing. By indicating a calendar year, it is quite clear the law does not apply to each game but rather to the aggregate of all proceeds. The Bureau has added an unneeded and inadequate issue to a simple resolution. Proceeds may not be used for wages [10 P.S. §502(b)(1)].

The reference in Count No. 4 [10 P.S. §503] is accurate but the charge lists no specific regulations. At the hearing, I asked Bureau counsel to provide a detailed list of regulations the conduct is alleged to have broken. Counsel provided some in one of three post-hearing letter/briefs.

It is the Bureau's obligation to satisfy Due Process/Notice; it is the ALJ's obligation to determine whether the described conduct is unlawful and how so. In this functional duality, certainly the Bureau needs to be prepared to alert the ALJ to the offended provisions of law. More certainly, if the Bureau decides to include references to law or regulation, they ought to be accurate and consistent.³ Otherwise, what is the point of including references?

H. No Double Dipping Allowed⁴

For ice cream lovers, a double dip is a necessity, but not so in law. The Bureau claims Count Nos. 5 and 6 may be considered Liquor Code violations, as permitted by 10 P.S. §328.702(g)(2), even though the two charges merely repeat Count Nos. 3 and 4. By letter/brief of June 19, 2014, Bureau counsel refers to case law, statute, and regulation to argue the Bureau's position is squarely within the law.

For the most part, counsel's well-done letter/brief focuses on the definition of "violation." While I cannot but agree with counsel's analysis, I find it to be largely off point.

I also take issue with a second argument the letter/brief raises. Counsel claims that Liquor Code Section 471(c) [47 P.S. §4-471(c)] is a mandatory sentencing provision while [10 P.S. §328.702(g)(2)] is jurisdictional. I fully comprehend counsel's characterization but I find no persuasive value in it.

³ By consistent, I mean that one charge ought not to include a very general reference, while another's reference is precise.

⁴ "Double Dipping," as I mean it, is rooted in fundamental fairness notions. Double dipping is also inconsistent with statutory construction principles as they relate to the interpretational history of like provisions.

It is true, our complicated, multi-tiered jurisprudence provides for more than one consequence for unlawful conduct without any sense of double dipping arising. For example, a Commonwealth employee who engages in criminal behavior may experience not only criminal sanction but also loss of employment, loss of unemployment compensation benefits, and even loss of pension.

However and although the Liquor Code and the Local Option Small Games of Chance Act are in question, the two are *in pari materia*; they must be construed together as a unit.

The examination progresses. When does unlawful conduct become a “violation” in order to count it as one of three for purposes of transforming a Small Games of Chance indiscretion to one of the Liquor Code? It has long been standing policy that multiple Liquor Code charges do not call into play the mandatory suspension Liquor Code provision unless and until the three triggering violations were resolved, favorably for the Bureau, in a final Adjudication. The priors are not considered violations until final.

I hesitate to count the times our General Assembly has modified the Liquor Code through the years. Suffice it to say, it is not a small number. Had the Legislature been displeased with the policy, there was ample opportunity to enact law to abrogate it. Tacitly, the Legislature has approved of the finality concept as defining, “violation.” Having passed a new law (Act 2 of 2012) in which “violation,” as it relates to the Liquor Code is employed, it is totally reasonable to assume the General Assembly intended for this well-entrenched policy to carry on.

If one were to take the Bureau’s position to its logical conclusion, one discovers unreasonable results. In this matter, the Bureau opted to select Count Nos. 3 and 4 to double as Small Games of Chance and Liquor Code infractions. The Bureau could have chosen any one of the four Small Games of Chance charges to double as a Liquor Code violation. In fact, the Bureau could have chosen any of the mathematically possible combinations of the four initial charges.⁵ As such, the arbitrary decision to dress Count Nos. 3 and 4 in Liquor Code garb constitutes a Due Process entanglement.

And what of the possible domino effect generated by adopting the Bureau’s position? Assume a non-final Adjudication is followed by another in which Small Games of Chance charges are treated as Liquor Code indiscretions based upon the former Adjudication. Licensee then prevails on appeal of the former Adjudication. The Adjudication which followed must therefore be opened to re-assess a penalty no longer in consort with the Liquor Code. Should the licensee not appeal this subsequent Adjudication, the licensee would have suffered an uncorrectable penalty, such as liquor license suspension.

⁵ Regardless of how one interprets, “violation” this unfettered and standard less authority smacks of an unlawful delegation of legislative authority.

PRIOR ADJUDICATION HISTORY:

Licensee has been licensed since January 28, 1952, and has had five prior Adjudications since July 1, 1987, the date the Office of Administrative Law Judge was established.

In Re Citation No.: 88-1090. Fine \$350.00 and 3 days suspension.
Possessed or operated gambling devices or paraphernalia or permitted gambling or lotteries on the licensed premises (punchboards and tickets).

In Re Citation No.: 89-0310. Fine \$750.00 and 10 days suspension.
Possessed or operated gambling devices or paraphernalia or permitted gambling or lotteries on the licensed premises (punchboards and tickets).

In Re Citation No.: 91-0562. Fine \$350.00 and 7 days suspension.
Sales to nonmembers on November 29, 1990.

In Re Citation No.: 09-0401. Fine \$1,450.00.

1. Awarded an individual prize exceeding the maximum cash value of \$500.00 for any single chance without a special permit on January 9, 2009.
2. Failed to maintain complete and truthful records covering the operation of small games of chance for a period of 2 years immediately preceding January 16, 2009.
3. Offered and/or awarded more than \$5,000.00 in cash or merchandise in any seven day period during the periods October 8 through 14, November 12 through 18 and December 10 through 16, 2008.
4. Failed to maintain coil cleaning records on January 9, 2009.

In Re Citation No.: 10-2154. Fine \$2,350.00.

1. Possessed or operated gambling devices or paraphernalia or permitted gambling or lotteries on the licensed premises (tickets) on June 1, July 6 and August 3, 2010.

2. Failed to maintain complete and truthful records covering the operation of small games of chance for a period of 2 years immediately preceding August 3, 2010.
3. Offered and/or awarded more than \$5,000.00 in cash or merchandise in any seven day period during the periods April 7 through 13 and April 14 through 20, 2010.

PENALTY ASSESSMENT CRITERIA:

Mandatory Requirement(s)

First Cause of Action: Local Option Small Games of Chance Act, Count Nos. 1, 3 and 4

The Local Option Small Games of Chance Act provides that a club licensee is subject to a penalty of up to \$800.00 for a first violation. In addition, the ALJ may suspend or revoke the SGOC license.

Discretionary Component(s)

Count No. 1

Since this violation, the maximum permissible payout per week has been raised from \$25,000 to \$35,000 (Act 92 of 2013). Licensee has exceeded even the updated limit. Considering Licensee's past history, I am constrained to impose some suspension. I impose a \$800.00 fine and a fifteen days suspension of the Small Games of Chance license.

Count No. 3

\$800.00 fine.

Count No. 4

\$800.00 fine.

ORDER:

Dismissal

I dismiss Count Nos. 2, 5, and 6.

Imposition of Fine

Licensee must pay a \$2,400.00 fine within twenty days of the mailing date of this Adjudication. The mailing date is located on this Adjudication's first page, upper left corner. If Licensee fails to comply, the Liquor Code requires that I suspend or revoke the license.

Suspension Length and Date(s)

I suspend the Small Games of Chance license issued by the Adams County Treasurer, for fifteen days, beginning Monday, September 8, 2014, 7:00 a.m., and ending Tuesday, September 23, 2014, 7:00 a.m. Licensee is also prohibited from applying for a new Small Games of Chance license during the suspension period.

Instructions to Post Notice of Suspension Placard

Licensee shall post a Notice of Suspension Placard (PLCB Form 2436), herein enclosed, in a conspicuous place on the outside of the licensed premises, or in a window plainly visible from the outside of the licensed premises, on or before Monday, September 8, 2014, 7:00 a.m. The Suspension Placard may not be removed until Tuesday, September 23, 2014, 7:00 a.m.

Consequence of Failing to Comply With This Order

In addition to any other consequence at law, if Licensee does not comply with all conditions herein, the Bureau may issue an additional citation pursuant to Liquor Code Section 471, alleging Licensee has violated this Order. Alternatively, the Bureau may assert the same claim by requesting this Adjudication be reopened.

Notice to County Treasurer

I further direct that a copy of this Adjudication be sent to the Adams County Treasurer.

Retaining Jurisdiction

I retain Jurisdiction to ensure compliance with this Adjudication.

Dated this 3RD day of July, 2014.

A handwritten signature in cursive script that reads "Felix Thau". The signature is written in black ink and is positioned above a horizontal line.

Felix Thau, A.L.J.

bc

General Information

This Adjudication is a legal document. It affects your rights, privileges, and obligations. The information which follows is a general guide. If you have not already done so, it may be prudent for you to consult with an attorney.

Applying for Reconsideration

If you want the Administrative Law Judge to reconsider this Adjudication, you must submit a written application and a nonrefundable \$25.00 filing fee. Both must be received by the Office of Administrative Law Judge, (PLCB - Office of Administrative Law Judge, Brandywine Plaza, 2221 Paxton Church Road, Harrisburg, PA 17110-9661) within fifteen days of this Adjudication's mailing date. Your application must describe the reasons for reconsideration. The full requirements for reconsideration can be found in Title 1 Pa. Code §35.241.

Appeal Rights

If you wish to appeal this Adjudication, you must file an appeal within thirty days of the mailing date of this Adjudication by contacting the Office of Chief Counsel of the Pennsylvania Liquor Control Board (717-783-9454). For further information, visit www.lcb.state.pa.us. The full requirements for an appeal can be found in 47 P.S. §4-471.

Detach Here and Return Stub with Payment – Note Citation Number on Check

The fine must be paid by cashier's check, money order, or a check drawn on the business or trust account of an attorney licensed in Pennsylvania. **Personal and business checks are NOT acceptable unless bank certified.** Please make your guaranteed check payable to the Commonwealth of Pennsylvania and mail it, along with any required documentation to:

PLCB – Office of Administrative Law Judge
Brandywine Plaza
2221 Paxton Church Road
Harrisburg, PA 17110-9661

Credit/debit cards may be used: visit www.lcb.state.pa.us scroll over LEGAL and then click on Office of ALJ for instructions.