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State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
140 East Front St.
Trenton, N.J. 08625

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State of New Jersey
Division of Gaming Enforcement
Agency Docket No.: 12-0281-VC

State of New Jersey, Department
of Law and Public Safety,
complainant

Civil Action

Complaint

vs.

DVH Music Entertainment, LLC.,
Jeff Tran, Vy Tran, Lein Pham and
Saigon Entertainment, Inc.
respondents

Complainant, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement (hereinafter Division), located at 140 East Front St.
Trenton, N.J. says:

COUNT ONE

1. The Division is responsible, pursuant to *N.J.S.A. 5:12-76*, for the investigation

and prosecution of violations of the provisions of the New Jersey Casino Control Act, *N.J.S.A. 5:12-1 et seq.* (hereinafter the Act) and the regulations promulgated pursuant thereunder.

2. DVH Music Entertainment, LLC. (hereinafter DVH) is a limited liability corporation formed in the State of New Jersey on or about November 5, 2004.

3. The business of DVH is the promotion of Asian entertainment shows for several casinos in Atlantic City.

4. The owners of record for DVH are Jeff Tran and Vy Tran.

5. Lien Pham is the mother of Jeff Tran and Vy Tran. Lien Pham has been prohibited from doing business with casinos in Atlantic City for 5 years by order of the Casino Control Commission (Commission) under Agency Docket No. 06-0601-SR dated March 8, 2007. Also prohibited from doing business with casinos in Atlantic City by the Commission pursuant to this order was Lien Pham's company Saigon Entertainment, Inc.

6. Lien Pham and Saigon Entertainment, Inc. were in the business of promoting Asian entertainment shows at casinos in Atlantic City at the time they were barred from doing business by the Commission.

7. The idea to form DVH was Lien Pham's. The name DVH Music Entertainment was created by Lien Pham. Jeff Tran has acknowledged in a sworn interview that he has no idea what DVH stands for.

8. The Limited Liability Agreement used to form DVH lists Vy Tran and Jeff Tran as the only two persons who made capital contributions to the limited liability corporation that is DVH. In sworn testimony, both Jeff Tran and Vy Tran acknowledged that neither of them made a capital contribution to DVH, and further testified that in fact, Lien Pham provided

the capital contribution for the formation of DVH.

9. Vy Tran has also acknowledged under oath that she has nothing to do with the operation of DVH and she has never drawn any form of compensation from DVH.

10. Jeff Tran has acknowledged under oath that he has drawn no income from DVH.

11. Jeff Tran has also acknowledged under oath that the only person to draw any form of compensation from DVH is Lien Pham. Mr. Tran has testified that all profit that DVH makes on the shows it promotes in Atlantic City is paid to Lien Pham.

12. From March 14, 2007 until December 11, 2009 DVH generated in excess of \$1,105,000 in gross revenues from Bally's in Atlantic City.

13. From March 14, 2007 to March 12, 2009, at least 10 casino checks were issued to DVH by Bally's totaling \$588,212. All of those checks were endorsed by Lien Pham.

14. DVH's operating address is 508 N. Victoria Ave. in Ventnor New Jersey. This address is a residence owned by Lien Pham. Mr. Tran testified that DVH leases the premises from Lien Pham.

15. Jeff Tran has testified under oath that Lien Pham was the person responsible for arranging all of the Asian acts booked for casino shows promoted by DVH. Neither Mr. Tran nor Ms. Tran were responsible for arranging any Asian acts promoted by DVH.

16. On April 10, 2007, January 21, 2008 and April 28, 2008 DVH issued three checks to Lien Pham in amounts totaling \$17,813.61.

17. On April 10, 2007, January 22, 2008 and June 18, 2008 DVH issued three checks totaling \$10,500 to Saigon Entertainment.

18. All amounts paid to Lien Pham or Saigon Entertainment by DVH and referred

to in paragraphs 16 and 17 above were paid to Lien Pham and Saigon Entertainment after the Commission issued its prohibitory order barring Lien Pham and Saigon Entertainment from doing business with casinos in Atlantic City.

19. Based upon the facts set forth in paragraphs 2 through 18 it is clear that DVH Entertainment LLC, has operated as an entity by Lien Pham to continue to promote Asian entertainment shows in Atlantic City casinos and derive income and profits from the promotion of those shows after she and her company Saigon Entertainment were barred by the Commission from doing business with casinos in Atlantic City by the prohibitory order dated March 8, 2007.

20. Based on the facts set forth in paragraphs 2 through 18 it is clear that Jeff Tran and Vy Tran were instrumental in allowing Lien Pham to circumvent the Commission prohibitory order and continue to promote and profit from Asian Entertainment shows in Atlantic City Casinos.

WHEREFORE, complainant demands the following relief against DVH Music Entertainment, Jeff Tran and Vy Tran:

1. An Order barring DVH Music Entertainment, LLC from doing any business with casinos in Atlantic City.

2. An Order barring Jeff Tran from doing any business with casinos, individually and directly, or through any companies owned or operated by him, or as an employee of any companies doing business with casinos in Atlantic City.

3. An Order barring Vy Tran from doing any business with casinos, individually and directly, or through any companies owned or operated by her, or as an employee of any companies doing business with casinos in Atlantic City.

4. The imposition of a fine pursuant to the provisions of *N.J.S.A. 5:12-129(5)*.

5. Restitution of all moneys paid by casinos to DVH Music Entertainment, LLC for shows promoted by DVH from March 8, 2007 to the present.

COUNT TWO

21. The allegations of paragraphs 1 through 20 above are repeated, realleged and incorporated by reference herein.

22. Lien Pham and Saigon Entertainment Inc. were barred from conducting any direct or indirect business with or supplying goods and services to any casino licensee for 5 years by order of the Commission dated March 8, 2007 and placed on the Prohibited Vendor's List by the Commission.

23. Notwithstanding the Commission order barring Lien Pham and Saigon Entertainment, Inc. from doing any direct or indirect business with casino licensees, Lien Pham and Saigon Entertainment, Inc. did in fact continue to do business directly and indirectly with and profit from such business with casino licensees from on or about March 14, 2007 through on or about December 31, 2011 using DVH Music Entertainment, LLC and Jeff Tran as a front for the purpose of circumventing the prohibition on Lien Pham and Saigon Entertainment Inc.

WHEREFORE, complainant demands the following relief against Lien Pham individually and Saigon Entertainment, Inc.

1. The imposition of the maximum fine allowable pursuant to the provisions of *N.J.S.A. 5:12-129(5)* and *N.J.S.A. 5:12-123a* for each day it violated the relevant

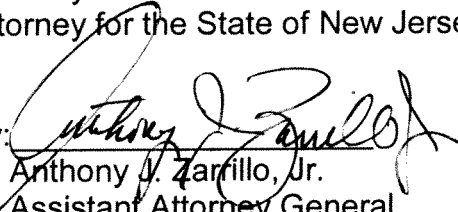
provisions of the Casino Control Act.

2. Restitution of all moneys paid by casinos to DVH Music Entertainment, LLC, Lien Pham and/or Saigon Entertainment, Inc. for shows promoted by DVH from March 8, 2007 to the present.

3. An Order barring Lien Pham and Saigon Entertainment, Inc. from doing business directly or indirectly with any casino licensees for 5 additional years.

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Attorney for the State of New Jersey

By:


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Dated: April 30, 2012