

JEFFREY S. CHIESA
 Attorney General of New Jersey
 Attorney for Petitioner
 State of New Jersey
 Department of Law and Public Safety
 Division of Gaming Enforcement
 1300 Atlantic Avenue
 Atlantic City, New Jersey 08401

By: Brian C. Bisciegia
 Deputy Attorney General
 (609) 317-6218

STATE OF NEW JERSEY
 OFFICE OF THE ATTORNEY GENERAL
 DIVISION OF GAMING ENFORCEMENT
 DOCKET NO. 12-0718-EL

STATE OF NEW JERSEY, DEPARTMENT)
 OF LAW AND PUBLIC SAFETY,)
 DIVISION OF GAMING ENFORCEMENT,)
)
 Petitioner,)
)
 v.)
)
 JAQUASHA CARTER, A.K.A. LONDON)
 MATTHEWS)
)
 Respondent.)
 _____)

Civil Action
 PETITION FOR
 PLACEMENT ON
 EXCLUSION LIST

Petitioner, State of New Jersey, Department of Law and Public Safety,
 Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City,
 New Jersey, 08401 says:

1. Respondent, JAQUASHA CARTER, a.k.a. LONDON MATTHEWS

("Carter"), is a resident of New Jersey, having an address of [REDACTED]

2. N.J.A.C. 13:69G-1.3(a)3 provides, in pertinent, part for the exclusion of:

any person who has been convicted of a criminal offense.... punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein.

3. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of

any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

iii Persons who pose a threat to the safety of the patrons or employee sof a casino licensee

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees

4. On March 17, 2011, Carter was charged in Atlantic County Indictment No. 11-03-0692-CCP with Theft from the Person, third degree, contrary to N.J.S.A. 2C:20-3, and two other related offenses. Carter stole \$3,000 from a patron of the Showboat Casino-Hotel. On March 16, 2012, upon her plea, Carter was convicted of Theft from the Person, third degree, contrary to N.J.S.A. 2C:20-3. The remaining charges were dismissed.

Carter was sentenced to a 2 year term of probation and, further, required to pay certain fines an fees. Carter was also ordered to stay out of all casinos during her probation term.

5. On November 30, 2011, Carter was charged in Atlantic County Accusation No. 11-11-03-0692-CCP with Theft from the Person, third degree, contrary to N.J.S.A. 2C:20-3. Carter stole \$113 from the back pocket of a patron of Harrah's Atlantic City. On March 16, 2012, upon her plea, Carter was convicted of the offense, and was sentenced to a 2 year term of probation and, further, required to pay certain fines an fees. Carter was also ordered to stay out of all casinos during her probation term.

6. On December 4, 2010, Carter was arrested and charged with Engaging in Prostitution, contrary to N.J.S.A. 2C:34-1b(1). 20-3. Carter offered to engage in sexual activity with an undercover detective in exchange for financial compensation at the Showboat Casino-Hotel. On February 24, 2012, upon her plea, Carter was convicted of the offense and sentenced to an incarceration term of 22 days, and, further, required to pay certain fines an fees.

7. On October 20, 2010, Carter was arrested and charged with Criminal Trespass, contrary to N.J.S.A. 2C:18-3. Carter reentered the Trump Taj Majal Casino Resort after having been previously evicted. On February 24, 2012, upon her plea, Carter was convicted of the offense and required to pay certain fines an fees.

8. Based on information contained in Paragraphs 1 through 7 of this

petition, Carter is a person who has been convicted of a criminal offense punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)3.

9. Based on information contained in Paragraphs 1 through 7 of this petition, Carter is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent, Jaquasha Carter, a.k.a. London Matthews:

A. Judgment that the Respondent, Jaquasha Carter, a.k.a. London Matthews, is a person who has been convicted of an offense punishable by more than 6 months in jail and whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)3;

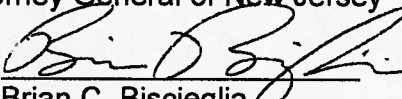
B. Judgment that the Respondent, Jaquasha Carter, a.k.a. London Matthews, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)4;

C. Judgment entering a Final Order placing Respondent, Jaquasha Carter, a.k.a. London Matthews, on the exclusion list pursuant to N.J.S.A. 5:12-71(l) and N.J.A.C. 13:69G-1.3(a)3 and 13:69G-1.3(a)4; and,

D. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

JEFFREY S. CHIESA
Attorney General of New Jersey

By: 
Brian C. Bisciegli
Deputy Attorney General

Dated

9/24/12