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State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

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STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 13-0043-EL

STATE OF NEW JERSEY, DEPARTMENT)	
OF LAW AND PUBLIC SAFETY,)	
DIVISION OF GAMING ENFORCEMENT,)	
)	
Petitioner,)	Civil Action
)	
v.)	PETITION FOR
)	PLACEMENT ON
SAMUEL W. JACKSON,)	EXCLUSION LIST
)	
Respondent.)	
)	

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, SAMUEL W. JACKSON ("Jackson"), is a New Jersey resident, residing at 1554 North Ohio Avenue, Atlantic City, New Jersey 08401.

2. *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 employees of a casino licensee;
- iii. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees; and
- iv. Persons subject to an order of the Superior Court of New Jersey excluding such persons from all casino hotel facilities.

3. Between January 2010 and December 2012 Jackson was arrested a total of thirteen (13) times, all of which resulted in convictions as follows:

- i. Twelve (12) times for Defiant Trespasser in violation of *N.J.S.A. 2C:18-3b*; and
- ii. Once for Theft by Unlawful Taking (fourth degree) in violation of *N.J.S.A. 2C:20-3a*.

4. All of the convictions referenced in Paragraph 3 above occurred on licensed casino premises in the City of Atlantic City. All Defiant Trespasser offenses and the fourth degree Theft by Unlawful Taking offense were adjudicated before the Municipal Court of Atlantic City.

4. In connection with the sentencing on the Defiant Trespasser convictions, Banks has been barred for a period of two years as follows:

- i. On February 3, 2010, from Borgata Hotel and Casino;
- ii. On March 24, 2010, from Tropicana Hotel and Casino;
- iii. On May 31, 2010, from Borgata Hotel and Casino;
- iv. On March 24, 2011, from Trump Plaza Hotel and Casino;
- v. On May 31, 2011, from Showboat Hotel and Casino;

- vi. On September 16, 2011, from Tropicana Hotel and Casino;
- vii. On May 14, 2012, from Tropicana Hotel and Casino;
- viii. On May 14, 2012, from Showboat Hotel and Casino;
- ix. On May 21, 2012, Caesars Hotel and Casino;
- x. On June 28, 2012, from Showboat Hotel and Casino;
- xi. On October 15, 2012, from Borgata Hotel and Casino; and
- xii. On October 15, 2012, from Golden Nugget Hotel and Casino.

5. In addition to the two year barment in connection with Jackson's sentences on October 15, 2012 referenced in Paragraph 4 at xi. and xii., Jackson was sentenced to 30 days incarceration consecutively on each matter.

6. With respect to Jackson's conviction for Theft by Unlawful Taking From the Person (fourth degree), on August 29, 2010, Jackson stole a gaming voucher in the amount of \$157.00 belonging to another casino patron while on the casino floor of Bally's Hotel and Casino.

7. Based on information contained in Paragraphs 1 through 6 of this petition, Jackson 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.13:69D-1.3(a)4*.

WHEREFORE, Petitioner demands the following relief against Respondent:

A. Judgment that the Respondent, Samuel W. Jackson, is a person whose presence in a licensed casino establishment would be inimical to the interest of

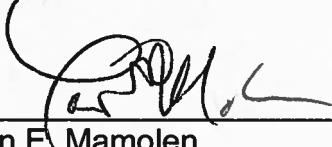
the State of New Jersey or of licensed gaming therein, within the meaning of *N.J.A.C.13:69D-1.3(a)4*;

B. Judgment entering an Order placing Respondent, Samuel W. Jackson, on the Exclusion List pursuant to *N.J.S.A. 5:12-71(l)* and *N.J.A.C. 13:69G-1.3(a)4*; and,

C. Judgment for such other and further relief as may be just and appropriate under the circumstances.

Respectfully submitted,

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By: 

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Dated: January 15, 2013