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STATE OF NEW JERSEY  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 12-0665-VC

STATE OF NEW JERSEY,	)	
DEPARTMENT OF LAW AND	)	
PUBLIC SAFETY, DIVISION OF	)	
GAMING ENFORCEMENT,	)	
	)	
Complainant,	)	Civil Action
	)	
v.	)	COMPLAINT
	)	
SHOWBOAT ATLANTIC CITY	)	
OPERATING COMPANY, t/a	)	
SHOWBOAT CASINO HOTEL,	)	
	)	
Respondent.	)	
	)	

Complainant, 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:

**COUNT I**  
**(Count Room Procedures)**

1. Respondent, SHOWBOAT ATLANTIC CITY OPERATING COMPANY, LLC, t/a SHOWBOAT CASINO HOTEL ("Showboat") is a New Jersey enterprise having its principal place of business at 801 Boardwalk, Atlantic City, New Jersey 08401.

2. Showboat is the holder of a casino license first issued on April 2, 1987, and continuously renewed thereafter. At all times relevant herein, Showboat was authorized to conduct casino gaming within its casino hotel facility.

3. N.J.A.C. 13:69D-1.33(b) provides, in pertinent part, that:

A casino licensee shall open, count, and record the contents of each drop box in the soft count room except that an emergency slot cash storage box may be held and counted on the regularly scheduled count for the slot machine from which it originated.

4. On April 17, 2012, at approximately 6:00 a.m., Showboat drop team personnel removed a drop box attached to a Four Card Poker table, located in pit #3, FC-03-07, and replaced the drop box with an empty drop box.

5. The drop box removed from table FC-03-07 was placed in a trolley and transported to the count room to be counted.

6. On April 17, 2012, in the count room, the drop box from table game FC-03-07 was removed from the trolley and placed on the count room table.

7. Subsequent to the events described in Paragraph 7, above, the drop box which had been removed from table FC-03-07 and placed on the count room table was returned to the trolley without being opened and without its contents being counted.

8. Based upon the information in Paragraphs 1 through 7, above, on April 17, 2012 Showboat, by its count room personnel, failed to count the contents of the drop box removed from gaming table FC-03-07 as required by N.J.A.C. 13:69D-1.33(b).

WHEREFORE, Complainant demands the following relief against Respondent, Showboat:

A. Judgment that on April 17, 2012, Showboat, by its count room personnel, failed to count the contents of the drop box removed from Four Card Poker gaming table, FC-03-07, in violation of N.J.A.C. 13:69D-1.33(b); and

B. Judgment imposing against Showboat a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5); and

C. Judgment imposing against Showboat such other and further relief as may be deemed just and appropriate under the circumstances.

**COUNT II**  
**(Drop Box Procedures)**

9. COUNT I is incorporated by reference herein and made a part hereof as if set forth at length.

10. N.J.A.C. 13:69D-1.17 (h) provides, in pertinent part, that:

For each pit where drop boxes are exchanged, a casino games supervisor shall record on a drop box verification form, at a minimum, the following:

1. The gaming date;
2. The trolley number;
3. The pit number; and
4. The number of empty drop boxes on the trolley for that pit.

11. N.J.A.C. 13:69D-1.17 (i) provides, in pertinent part, that:

The casino games supervisor in (h) above shall:

1. Sign the drop box verification form before the trolley leaves the pit attesting that the number of drop boxes being removed from the pit equals the number of drop boxes that have been loaded on the trolley, and that the security padlock on the trolley is locked prior to the trolley leaving the pit; and
2. Obtain the signature of a security department member on the drop box verification form attesting to the accuracy of such reconciliation and that the trolley has been secured with a locked padlock.

12. On April 18, 2012, the casino games supervisor completed the drop box verification form indicating that 16 empty drop boxes had been delivered to Pit #3.

13. Subsequent to the events described in Paragraph 12, the drop team personnel commenced the pick up of drop boxes from Pit #3. As the drop box designated for table FC-03-07 had not been counted, it could not be attached to the gaming table.

14. As the drop box designated for table FC-03-07 could not be attached to the gaming table, it was returned to the trolley together with the drop box which had been properly attached to the gaming table. Thereafter, an emergency drop box was delivered to Pit #3 and attached to gaming table FC-03-07.

15. Subsequent to the events described in Paragraph 12, above, the casino games supervisor and a security department member signed the drop box verification form which indicated that 17 drop boxes had been picked up from Pit #3. No reconciliation of the discrepancy between the number of drop boxes delivered to Pit #3 (16) and the number of drop boxes removed from Pit #3 (17) was performed.

16. Based upon the information in Paragraphs 9 through 13, above, Showboat, by its games and security personnel, failed to accurately record information on the drop box verification form and, thereafter, attested to the information on the form in violation of N.J.A.C. 13:69D-1.17 (h) and (i).

WHEREFORE, Complainant demands the following relief against

Respondent, Showboat:

A. Judgment that on April 18, 2012, Showboat, by its casino games supervisor, failed to accurately record information on the drop box verification form, in violation of N.J.A.C. 13:69D-1.17 (h);

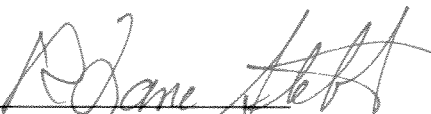
B. Judgment that on April 18, 2012, Showboat casino games supervisor and security department employee signed a drop box verification form containing inaccurate, in violation of N.J.A.C. 13:69D-1.17 (i);

C. Judgment imposing against Showboat a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5); and,

D. Judgment imposing against Showboat such other and further relief as may be deemed just and appropriate under the circumstances.

Respectfully submitted,

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Attorney for Complainant

By:   
R. Lane Stebbins  
Deputy Attorney General

Dated:

A-33-12-018

*September 13, 2012*