

1. Respondent, YESENIA MORALES ("Morales"), is a resident of New Jersey, having an address of [REDACTED]

2. N.J.A.C. 13:69D-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. 13:69D-1.3(a)4 provides, in pertinent, part for 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

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

4. On August 11, 2011, Morales was arrested by the Atlantic City Police Department. On November 2, 2011, Morales was charged in Atlantic County Indictment 11-11-2629 B with Engaging in Prostitution (4th degree), N.J.S.A. 2C:34-1.

On July 20, 2012, following her plea of guilty to the charge, Morales was sentenced to an 18 month term of probation.

5. On June 23, 2012, Morales was arrested by the Atlantic City Police Department. On July 13, 2012, Morales was charged in Atlantic County Accusation 12-07-1537 A with Engaging in Prostitution (4th degree), N.J.S.A. 2C:34-1. On July 20, 2012, following her plea of guilty to the charge, Morales was sentenced to an 18 month term of probation concurrent with the sentence imposed for Indictment 11-11-2629 B, as described in Paragraph 4, above.

6. On May 16, 2010, Morales was arrested and charged with Defiant Trespass, N.J.S.A. 2C:18-3. Morales allegedly entered the premises of the Tropicana Casino Hotel and Resort after previously being evicted. On June 3, 2010, upon her plea, Morales was convicted of the offense by the Atlantic City Municipal Court. In addition to fines and other penalties, Morales was ordered to not to return or enter the Tropicana premises for a period of two years.

7. On October 3, 2011, Morales was arrested and charged with Defiant Trespass, N.J.S.A. 2C:18-3. Morales allegedly entered the premises of the Tropicana Casino Hotel and Resort after previously being evicted. On November 21, 2011, upon her plea, Morales was convicted of the offense by the Atlantic City Municipal Court. In addition to fines and other penalties, Morales was sentenced to a 30 day jail

term which was suspended.

8. On October 11, 2011, Morales was arrested and charged with Defiant Trespass, N.J.S.A. 2C:18-3. Morales allegedly entered the premises of the Showboat Casino Hotel after previously being evicted. On October 18, 2011, upon her plea, Morales was convicted of the offense by the Atlantic City Municipal Court. In addition to fines and other penalties, Morales was sentenced to two years of probation (non-reporting) and ordered to not to return or enter the Showboat premises for a period of two years.

9. On January 1, 2012, Morales was arrested and charged with Defiant Trespass, N.J.S.A. 2C:18-3. Morales allegedly entered the premises of the Golden Nugget Casino Hotel after previously being evicted. On May 14, 2012, upon her plea, Morales was convicted of the offense by the Atlantic City Municipal Court and was ordered to pay certain fines and other penalties.

10. In addition to the criminal offenses described in Paragraphs 4 through 9, above, Morales has been evicted from several Atlantic City casino hotels, including the Tropicana Casino Hotel and Resort (May 16, 2010), the Showboat Casino Hotel (August 31, 2011) and Trump Taj Mahal Casino Hotel (November 21, 2011 and January 3, 2012).

11. Based on information contained in Paragraphs 4 and 5 of this petition, Morales is a person who has been convicted of an offense punishable by more than 6 months incarceration and 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)3.

12. Based on information contained in Paragraphs 4 through 10 of this petition, Morales 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, Yesenia Morales:

A. Judgment that the Respondent, Yesenia Morales, 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)3;

B. Judgment that the Respondent, Yesenia Morales, 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

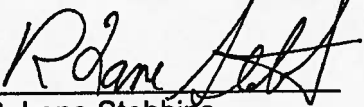
N.J.A.C.13:69G-1.3(a)4;

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

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

Respectfully submitted,

JEFFERY S. CHIESA
Attorney General of New Jersey

By: 
R. Lane Stebbins
Deputy Attorney General

Dated *September 26, 2012*