

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 July 9, 2008, Zoughy was arrested by the New Jersey State Police and charges with Theft, N.J.S.A. 2C:20-3. Zoughy allegedly stole gaming chips valued at \$1,002 from a patron of the Borgata Casino Hotel & Spa. On April 29, 2009, Zoughy was charged in Atlantic County Indictment 09-04-01121 with Theft, N.J.S.A. 2C:20-3.

5. On March 18, 2012, Zoughy was arrested in the State of Delaware on fugitive charges.

6. On September 14, 2012, following his plea of guilty to the charge, Zoughy was convicted of the crime and sentenced to a 3 year term of probation with the condition that he stay out of Atlantic City casinos.

7. Based on information contained in Paragraphs 4 through 6 of this petition, Zoughy 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.

8. Based on information contained in Paragraphs 4 through 6 of this petition, Zoughy 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, Ahmed Zoughy:

A. Judgment that the Respondent, Ahmed Zoughy, 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, Ahmed Zoughy, 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, Ahmed Zoughy, 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

Jan 30, 2013