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Acting 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
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By: Brian C. Biscieglia
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STATE OF NEW JERSEY
DOCKET NO. 14-0036-EL

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| STATE OF NEW JERSEY, DEPARTMENT OF LAW AND PUBLIC SAFETY, DIVISION OF GAMING ENFORCEMENT, | ) | |
| Petitioner, | ) | Civil Action |
| v. | ) | PETITION FOR PLACEMENT ON EXCLUSION LIST |
| JONAH BRUCE, | ) | |
| 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, JONAH BRUCE ("Bruce"), is a New Jersey resident, residing at [redacted]

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

3. On April 2, 2013, Bruce was arrested and charged with Criminal Trespass, contrary to N.J.S.A. 2C:18-3. Bruce reentered Tropicana Hotel Casino and Resort after having been previously evicted. On June 27, 2013, Bruce was convicted of this offense in Atlantic City Municipal Court and fined.

4. On September 22, 2013, Bruce was arrested and charged with Criminal Trespass, contrary to N.J.S.A. 2C:18-3. Bruce reentered Tropicana Hotel Casino and Resort after having been previously evicted. On October 24, 2013, Bruce was convicted of this offense in Atlantic City Municipal Court and fined.

5. On October 16, 2013, Bruce was arrested and charged with Criminal

Trespass, contrary to N.J.S.A. 2C:18-3. Bruce reentered Trump Plaza Casino Hotel after having been previously evicted. On October 24, 2013, Bruce was convicted of this offense in Atlantic City Municipal Court and fined.

6. Based on information contained in Paragraphs 1 through 5 of this Petition, Bruce 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, Jonah Bruce:

A. Judgment that Respondent, Jonah Bruce, 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;

B. Judgment entering a final order placing Respondent, Jonah Bruce, on the exclusion list pursuant to N.J.S.A. 5:12-71 and 13:69G-1.3(a)4 and,

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

Respectfully submitted,

**JOHN J. HOFFMAN**
Acting Attorney General of New Jersey

By: _____
Brian C. Biscieglia
Deputy Attorney General

Dated: 1/27/14