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State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
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STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0697-EL

STATE OF NEW JERSEY, DEPARTMENT
OF LAW AND PUBLIC SAFETY,
DIVISION OF GAMING ENFORCEMENT,

Petitioner,

v.

MARKLAND K. GRANT,

Respondent.

Civil Action

PETITION FOR
PLACEMENT ON
EXCLUSION LIST

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, MARKLAND K. GRANT ("Grant"), is a New York
resident, residing at [REDACTED]

2. *N.J.A.C. 13:69G-1.3(a)3* authorizes the exclusion of

[a]ny person who has been convicted of a criminal offense under the laws of any state, or of the United States, which is punishable by more than six months of incarceration, or who has been convicted of any crime or offense involving moral turpitude, and whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein...

3. *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.

4. Between February 2008 and April 2011 Grant was arrested and convicted 9 times for the following offenses: Defiant Trespass, N.J.S.A. 2C:18-3b (6 occasions); Attempting to Cause Purposely/Knowingly to Cause Bodily Injury to Another, N.J.S.A. 2C:12-1a(1) (1 occasion); Criminal Mischief with Damage, N.J.S.A. 2C:17-3a(1) (1 occasion); and Improper Behavior/Disorderly Conduct, N.J.S.A. 2C:33-2(a)1. All of the matters set forth in this paragraph occurred within licensed casino facilities in Atlantic City and all were adjudicated before the Atlantic City Municipal Court.

5. Between November 2010 and June 2012 Grant was arrested an additional 7 times for the following offenses: Defiant Trespass, N.J.S.A. 2C:18-3b (6 occasions); and Improper Behavior/Disorderly Conduct, N.J.S.A. 2C:33-2(a)1 (1

occasion). Court disposition of these arrests remains pending. All of the matters set forth in this paragraph occurred within licensed casino facilities in Atlantic City.

6. In connection with the sentencing on the convictions set forth in paragraph 3, Grant has been barred from Harrah's Hotel Casino, Caesars' Hotel and Casino, Bally's Park Place, Wild Wild West and Trump Plaza Casino Hotel.

7 On various dates from January 2000 to October 2006, Grant has been arrested a total of 7 times in the State of New Jersey, 6 times in Atlantic City and once in Egg Harbor Township. As a result of those arrests Grant has been convicted of Possession of Controlled Dangerous Substance or Analog, N.J.S.A. 2C:35-10a(1) (third degree) and Hindering Apprehension, N.J.S.A. 2C:29-3a (third degree). Grant's convictions in the third degree under the New Jersey Criminal Code are each punishable by more than six (6) months of incarceration.

8. Based on information contained in Paragraphs 1 through 7 of this Petition, Grant is a person who has been convicted of a criminal offense under the laws of New Jersey punishable by more than six months of incarceration.

9. Based on information contained in Paragraphs 1 through 7 of this petition, Grant 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, Markland K. Grant, is a person who has been convicted of an offense punishable by more than 6 months in jail and

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)3;

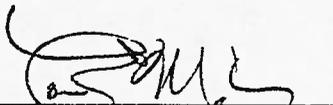
B. Judgment that the Respondent, Markland K. Grant, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C.13:69D-1.3(a)4;

C. Judgment entering an Order placing Respondent, Markland K. Grant, on the Exclusion List pursuant to N.J.S.A. 5:12-71(l) and N.J.A.C.13:69G-1.3(a)3 and 13:69G-1.3(a)4; and,

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

Respectfully submitted,

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Attorney General of New Jersey

By: 
Lon E. Mamolen
Deputy Attorney General

Dated: September 24, 2012