JEFFREY S. CHIESA
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
Atlantic City, New Jersey 08401

By: David M. Lolli
Deputy Attorney General
(609) 292-8680

STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0792-EL

STATE OF NEW JERSEY, DEPARTMENT OF LAW AND PUBLIC SAFETY, DIVISION OF GAMING ENFORCEMENT, Petitioner, v. ZHAO M. MO, 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, ZHAO M. MO ("Mo"), is a resident of New Jersey, having an address of [redacted]

2. N.J.A.C. 13:69G-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. 13:69G-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
>
> i. Cheats
>
> 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 February 19, 2011, Mo was arrested by the New Jersey State Police for conspiring to cheat with two others at mini Baccarat and to defraud Trump Marina Hotel and Casino of $90,000. On March 23, 2011, Mo was charged in Atlantic County indictment 11-03-00750-I for Conspiracy to Cheat at Table Games (2nd degree), pursuant to N.J.S.A. 2C:5-2A(1) and Swindling and Cheating at Table Games (2nd

degree) pursuant to N.J.S.A. 5:12-113.

5. On February 14, 2012, Mo pled guilty to an amended plea of Theft by Unlawful Taking (3rd degree), N.J.S.A. 2C:20-3. Following his guilty plea, Mo was sentenced to three-hundred-sixty-four (364) days incarceration, three (3) years probation, restitution in the amount of $90,000 and barment from all Atlantic City casinos until his probation ends on March 19, 2015.

6. Based on information contained in Paragraphs 4 and 5 of this petition, Mo 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.

7. Based on information contained in Paragraphs 4 and 5 of this petition, Mo is a person who cheated at mini baccarat, 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, Zhao M. Mo:

A. Judgment that the Respondent, Zhao M. Mo, 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, Zhao M. Mo, 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, Zhao M. Mo, on the exclusion list pursuant to N.J.S.A. 5:12-71(i) 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,

JEFFREY S. CHIESA
Attorney General of New Jersey

By: _____
David M. Lolli
Deputy Attorney General

Dated 10/26/12