STATE OF NEW JERSEY
Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
Dkt No. 10-0378-VC

STATE OF NEW JERSEY, DEPARTMENT OF LAW AND PUBLIC SAFETY, DIVISION OF GAMING ENFORCEMENT,	)	
Petitioner,	)	**ORDER**
v.	)	
HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC, d/b/a HARRAH'S MARINA HOTEL & CASINO,	)	
Respondent.	)	

The Division filed a complaint on December 16, 2010, Docket No. 10-0378-VC, seeking sanctions against HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC d/b/a HARRAH'S MARINA HOTEL & CASINO ("Harrah's") for reasons set forth therein and, more specifically, that Harrah's permitted an underage person to enter, remain, and wager in its casino; and

Having considered the relevant provisions of the Casino Control Act, N.J.S.A. 5:12-1 et seq., specifically N.J.S.A. 5:12-119(b), and the regulations promulgated thereunder, specifically N.J.A.C. 13:69C-16.1(a)1, N.J.A.C. 13:69C-16.1(a)2, and N.J.A.C. 13:69C-16.1(a)3; and

Having considered the Stipulation of Settlement which the parties executed and finding sufficient legal and factual support for the recommended penalty therein.

I hereby **ORDER** that the settlement be adopted and that a civil penalty in the aggregate amount of $2,500 be imposed upon Harrah's, payable upon receipt of an invoice from the Division.

Dated: July 6, 2012

DAVID L. REBUCK
DIRECTOR

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STATE OF NEW JERSEY
DOCKET NO.: 10-0378-VC

STATE OF NEW JERSEY, DEPARTMENT OF LAW AND PUBLIC SAFETY, DIVISION OF GAMING ENFORCEMENT, Complainant, v. HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC d/b/a HARRAH'S MARINA HOTEL & CASINO, Respondent.	STIPULATION OF FACTS AND SETTLEMENT

The above-captioned matter having been discussed by and between the parties involved, Jeffrey S. Chiesa, Attorney General of New Jersey, attorney for Complainant State of New Jersey, Department of Law and Public Safety, Division of

Gaming Enforcement ("Division") by Timothy C. Ficchi, Deputy Attorney General, and N. Lynne Hughes, Esquire, VP Legal Affairs & Chief Legal Officer - Caesars Entertainment/Eastern Division, attorney for Respondent Harrah's Atlantic City Operating Company, LLC d/b/a Harrah's Marina Hotel & Casino (hereinafter "Harrah's"), the following facts have been agreed upon and stipulated as to the Division and Harrah's:

Preliminary Facts

1. Respondent Harrah's is a New Jersey enterprise having its principal place of business located at 777 Harrah's Boulevard, Atlantic City, New Jersey 08401.

2. Harrah's is the holder of a casino license first issued by the Casino Control Commission on or about November 19, 1981 and most recently renewed on or about June 18, 2008 to be effective July 1, 2008.

3. At all times relevant herein, Harrah's was authorized to conduct casino gaming within its casino hotel facility.

Facts Regarding Underage Gambling of PP

4. PP is a male individual whose date of birth is June 6, 1990. At all times relevant herein, PP was under 21 years of age.

5. On August 7, 2010, shortly after 10:00 p.m., PP entered Harrah's casino floor and proceeded to Roulette table #209 ("RO 209").

6. PP purchased gaming chips at RO 209 and, at approximately 10:12 p.m., PP commenced gambling on that table without games personnel requesting PP to produce identification.

7. From approximately 10:12 p.m. until approximately 10:48 p.m., while gambling on RO 209, PP bet on the outcome of a total of nineteen (19) spins of the roulette wheel. At no time during PP's wagering did Harrah's personnel request PP to produce identification.

8. At approximately 11:00 p.m., PP left RO 209 and proceeded to the Casino Main Cage where he attempted to "cash in" one hundred twenty ($120.00) dollars in gaming chips obtained from his play at RO 209.

9. At the Casino Main Cage, the cashier requested of PP to produce identification. Upon PP's failure to produce identification, the cashier notified Harrah's Security Department who dispatched a security officer to establish the identity of PP. PP later admitted to Harrah's Security Department personnel that he was twenty (20) years of age and PP was subsequently charged by New Jersey State Police for underage gambling.

Applicable Law

10. N.J.S.A. 5:12-119(b) was effective at all times referenced herein and provides in pertinent part:

> Any licensee or employee of a casino who allows a person under the age at which a person is authorized to purchase and consume alcoholic beverages to remain in or wager in a casino or simulcasting facility is guilty of a disorderly persons offense; . . .

11. N.J.S.A. 9:17B-1(b) was effective at all times referenced herein and provides in pertinent part:

> The Legislature finds and declares and by this act intends. . to:
> b. Extend to persons 21 years of age and older the right to purchase and consume alcoholic beverages. . . .

12. N.J.A.C. 13:69C-16.1 was effective at all times referenced herein and provides in pertinent part:

> (a) No casino licensee or agent or employee thereof, shall allow, permit or suffer any person under the age at which a person is authorized to purchase and consume alcoholic beverages in this State ("underage person") to:
>
> 1. Enter a casino or casino simulcasting facility, except to pass directly to another room, unless the underage person is licensed under the Act and is acting in the regular course of his or her licensed activities;
>
> 2. Remain in a casino or casino simulcasting facility, unless the underage person is licensed under the Act and is acting in the regular course of his or her licensed activities;
>
> 3. Wager at any game or at casino simulcasting in a casino or casino simulcasting facility;. . . .

Prior Regulatory History of the Licensee

13. Harrah's was the subject of formal administrative complaints and found to have permitted underage persons to enter its casino, remain in its casino and wager at games in its casino on three (3) occasions within the past ten (10) years:

a) In State v. Marina Associates d/b/a Harrah's Marina Hotel & Casino, Dkt. No. 02-0441-VC (2002), the Commission imposed a fine of $20,000 against Harrah's for allowing an underage individual to gamble in its casino.

b) In State v. Marina Associates d/b/a Harrah's Marina Hotel and Casino, Dkt. No. 08-0518-VC (2009), the Commission imposed a fine of $15,000 against Harrah's for allowing an underage individual to gamble in its casino.

c) In State v. Harrah's Atlantic City Operating Company, LLC d/b/a Harrah's Marina Hotel & Casino, Dkt. No. 10-0144-VC (2011), a stipulation of settlement was approved imposing a fine of $15,000 against Harrah's for allowing an underage individual to gamble in its casino.

Corrective Action Of The Licensee And Mitigating Factors

14. The service of alcoholic beverages, the issuance of credit and the issuance of complimentaries were not involved in this incident.

15. Harrah's cage supervisor alerted security due to the youthful appearance of PP which resulted in the charge against PP's of underage gambling by New Jersey State Police.

16. One table games supervisor and one dealer were issued written warnings as a result of this incident.

17. Harrah's represents that its records indicate that it has caught and subsequently either arrested or ejected, prevented from entering or escorted from its casino floor 9,171 underage individuals in calendar year 2010; 7,802 in calendar year 2011; and 3,140 underage individuals in calendar year 2012 through June 17, 2012.

18. Harrah's has developed and implemented various initiatives to identify and stop individuals from participating in underage gambling:

a. With the assistance of its parent, subsidiary and affiliated companies, Harrah's has adopted responsible gaming initiatives, which teach employees, minors, parents and guardians about the consequences of

gambling under the legal age. These initiatives include, without limitation, front and back-of-house signage, detailed employee training on cues for identifying minors, and the on-going creation of materials to keep employees and players aware, including community awareness through TV public service announcements.

b. Harrah's trains its employees to card individuals who appear to be below the age of 30, and take other actions to detect potentially invalid identification. Harrah's now uses electronic ID scanners to card its guests. Harrah's issues appropriate and consistent discipline to its employees who fail to perform his or her employment obligations with regard to underage gaming or drinking.

c. Harrah's, through its Code of Commitment, repeatedly emphasizes to its employees, guests and surrounding communities that casino gaming is an adults-only activity, and Harrah's requires its employees to remain vigilant in their efforts to prevent underage gaming. In so doing, Harrah's restricts the placement and content of its advertising and marketing materials to age-appropriate venues and messages.

In sum, Harrah's asserts that it takes its responsibilities and obligations regarding responsible gaming seriously and it is consistently exploring avenues in which to advance its responsible gaming initiatives.

Settlement Agreement

WHEREAS, Respondent Harrah's admits that by permitting PP, an underage person, to enter the casino, remain in the casino, and wager at games in the casino, Respondent Harrah's violated N.J.S.A. 5:12-119(b), N.J.A.C. 13:69C-16.1(a)1, N.J.A.C. 13:69C-16.1(a)2, and N.J.A.C. 13:69C-16.1(a)3.

IT IS THEREFORE consented to and agreed upon by the Division of Gaming Enforcement and Harrah's that:

A. Respondent Harrah's shall pay the sum of $2,500 to the New Jersey Casino Revenue Fund as a civil penalty pursuant to N.J.S.A. 5:12-129(5) for the aforementioned violations associated with permitting PP, an underage person, to enter the casino, remain in the casino, and wager at games in the casino.

B. The parties agree that such penalty is just and equitable and in accordance with the criteria for the imposition of sanctions set forth at N.J.S.A. 5:12-130 and shall be in

full and final settlement of the allegations set forth in the above captioned complaint.

State of New Jersey, Department of Law and Public Safety, Division of Gaming Enforcement

Dated: 6/26/12

By: _____
Timothy C. Ficchi
Deputy Attorney General

Harrah's Atlantic City Operating Company, LLC d/b/a Harrah's Resort Atlantic City

Dated: 6/26/2012

By: _____
N. Lynne Hughes, Esquire
VP Legal Affairs & Chief Legal Officer - Caesars Entertainment/ Eastern Division