



State of New Jersey

Philip D. Murphy
Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
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Director

June 30, 2022

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Caesars Entertainment, Inc.
100 West Liberty Street, 12th Floor
Reno, NV 89501

Bessie A. Sacco, Esq.
Vice President & Chief Counsel, Regional Operations
Caesars Entertainment, Inc.
2831 Boardwalk
Atlantic City, NJ 08401

RE: Action in Lieu of Complaint

Dear Counsel:

The Division of Gaming Enforcement (Division) brings this Action in Lieu of Complaint against Caesars Entertainment, Inc. (CEI), a qualified holding company of Boardwalk Regency LLC (Caesars AC), Harrah's Atlantic City Operating Company (Harrah's AC), and Tropicana Atlantic City Corp. (Trop AC) (collectively, the AC Licensees), concerning its failure to comply with certain statutory and regulatory requirements set forth in the Casino Control Act (Act), *N.J.S.A. 5:12-1 et seq.*, and the regulations promulgated thereunder. In particular, CEI has violated the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a*, by employing seven individuals in positions serving the three AC Licensees without first ensuring the relevant employees held the requisite multi-casino endorsements on their respective casino key employee licenses. The relevant individuals and their titles are: Christine Boxer (CB), Vice President (VP) of National Casino Marketing; Christine Critelli (CC), VP of Human Resources – AC Region; Michael Pompei (MP), Director of Human Resources – AC Region; Cheryl Thomas (CT), Director of Materials Management; Steffan Van Der Molen (SVDM), VP of Catering & Conventions Events; James Ziereis (JZ), VP of Hotel Sales – AC Region; and Bessie Sacco (BS), VP & Chief Counsel, Regional Operations.



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N.J.S.A. 5:12-91.1 permits affiliated casino licensees to petition for a casino key employee to be endorsed as a multi-casino employee provided they do not engage in any incompatible functions. *N.J.A.C. 19:41A-5.4a* prohibits casino key employee licensees from being employed by multiple affiliated casino licensees without a multi-casino endorsement.

On April 28, 2022, the AC Licensees filed PRN 1242203 with the Division seeking multi-casino endorsements for the casino key employee licenses of the above-listed individuals in their respective capacities. Division review of the license status of these individuals revealed that each has been working for various periods of time without the proper multi-casino endorsement.

On November 15, 2021, the Division approved plans for the integrations of the Human Resources, Purchasing, Conventions, and Hotel Sales departments of the AC Licensees. The AC Licensees have now requested by PRN 1242203 multi-casino endorsements for certain employees of these integrated departments who have been working in their roles for the AC Licensees since November 2021. Specifically, CC (#7730-11), VP of Human Resources – AC Region and MP (#9837-11), Director of Human Resources – AC Region in the Human Resources department, CT (#8952-11), Director of Materials Management in the Purchasing department, SVDM (#9647-11), VP of Catering & Convention Events in the Conventions department, and JZ (#8600-11), VP of Hotel Sales in the Hotel Sales department have each worked in the respective integrated departments of the AC Licensees without the required multi-casino endorsements for more than five months before PRN 1242203 was filed. Accordingly, CEI has violated the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a*. Since approximately August 2021, CB (#7009-11), VP of National Casino Marketing, has been serving in that position for the AC Licensees while only maintaining a multi-casino endorsement on CB's casino key employee license for Caesars AC and Harrah's AC. As Trop AC did not have a National Casino Marketing department at that time and there were no personnel changes associated with the addition of Trop AC to the casino licensees that this department would serve, no approval from the Division of a synergy plan under Order No. 20-07-15-14, Condition 23 was necessary. Finally, BS (#9714-11), VP & Chief Counsel of Regional Operations has been representing the AC Licensees in New Jersey regulatory matters without the proper multi-casino endorsement on BS' casino key employee license for approximately one year. Accordingly, CEI has violated the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a*.

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The Division therefore accepts the offer of CEI to render a civil monetary penalty pursuant to *N.J.S.A.* 5:12-123, -129, and -130 in the amount of \$17,500 payable under the Act in accordance with *N.J.S.A.* 5:12-145a. CEI has agreed to pay such amount in recognition of the seriousness of its failures related to non-compliance with the mandates of *N.J.S.A.* 5:12-91.1 and *N.J.A.C.* 19:41A-5.4a. Any subsequent violations of the above-referenced statute and regulation by CEI may result in further regulatory action by the Division as appropriate under the circumstances.

Sincerely,

A handwritten signature in black ink that reads "David Rebeck". The signature is written in a cursive style with a horizontal line extending to the right.

DAVID REBUCK
DIRECTOR