



State of New Jersey

Philip D. Murphy
Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
P.O. Box 047
Trenton, NJ 08625-0047

Matthew J. Platkin
Attorney General

Tahesha L. Way
Lt. Governor

Mary Jo Flaherty
Interim Director

June 25, 2024

Jeffrey P. Hendricks, Esq.
Senior Vice President & Assistant General Counsel, Regulatory & Compliance
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 casino licensees 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 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, the AC Licensees have violated the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a*, by employing five individuals in positions serving more than one of the AC Licensees without first ensuring the relevant employees held the requisite multi-casino endorsements on their respective casino key employee licenses.

These individuals have each served in a full-time position for one AC Licensee while also serving in a part-time position for another AC Licensee. Specifically, Noel Galindo (NG) has



(609) 292-9394

New Jersey Is An Equal Opportunity Employer • Printed on Recycled Paper and Recyclable

served as a full-time Count Room Supervisor for Caesars AC since March 2001 and has served as a part-time Casino Shift Manager for Trop AC since 2019. Jamie Harris (JH) has served as a full-time Casino Shift Manager for Harrah's AC since February 2023 and has served as a part-time Casino Cashier Supervisor for Caesars AC since April 2022. Elizabeth Matos (EM) has served as a full-time Cage Cashier Supervisor for Trop AC since July 2019 and has served as a part-time Count Team Lead for Caesars AC since March 2023. Craven Turner (CT) has served as a full-time Casino Cash Services Supervisor for Harrah's AC since May 2018 and has served as a part-time Cage Cashier Supervisor for Caesars AC since April 2022. Danelle Washington (DW) has served as a full-time Casino Cashier Shift Manager for Trop AC and has served as a part-time Cage Cashier Supervisor for Caesars AC, both since January 2022.

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 employment with multiple affiliated casino licensees without a multi-casino endorsement.

By way of background, the AC Licensees and their qualified holding company Caesars Entertainment, Inc. (CEI) were subject to an action in lieu of complaint dated June 30, 2022 for similar violations of the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a* related to seven regional executives who worked primarily in Atlantic City. Thereafter, the AC Licensees conducted a series of self-audits of the licensing status of its AC Licensee personnel and updated its standard operating procedures. Despite these measures, the above-listed individuals were not determined to be without the requisite multi-casino endorsements for their respective casino key employee licenses until a May 8, 2024 inquiry from the Casino Control Commission regarding the casino key employee license resubmission of NG and NG's work for two of the AC Licensees. Post-inquiry, CEI conducted an audit of its employee records, which revealed that, in addition to NG, casino key employee licensees JH, EM, CT, and DW did not have the requisite multi-casino endorsements for their respective casino key employee licenses. Based on these additional failures by the AC Licensees in relation to the provisions of *N.J.S.A. 5:12-91.1* and *N.J.A.C. 19:41A-5.4a*, the Division brings this action in lieu of complaint.

On May 22, 2024, the AC Licensees filed PRN 1442401 with the Division seeking multi-casino endorsements for the casino key employee licenses of the above-listed five individuals in their respective capacities to address these matters going forward. This petition is pending.

Page 3
June 25, 2024

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 \$15,000 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 cursive script that reads "Mary Jo Flaherty".

MARY JO FLAHERTY
INTERIM DIRECTOR