

Internal Controls and Security Systems

ALL INTERNAL CONTROLS AND SECURITY SYSTEMS DOCUMENTS HAVE BEEN REDACTED

Proposed Internal Controls

Caesars will implement and enforce an Internal Control Plan, consistent with all applicable laws and rules.

The role of the Company's internal controls

Internal controls will be designed to provide reasonable assurance that the Company's specific goals and objectives will be achieved and all applicable laws are followed. Internal controls are a mean by which an organization's resources are directed, monitored and measured.

Through a properly executed set of internal controls, the Company can track transactions, assure proper taxation of revenues, prevent theft, loss or embezzlement and provide for public confidence in the integrity of casino operations.

Policies and procedures that will be put in place as internal controls will be either proactive or reactive in nature. They can be described as follows:

- **Preventative** – controls designed to prevent errors or irregularities from occurring in the Company's financial operations.
- **Directive** – controls designed to encourage appropriate and lawful conducts that promote public confidence in the Company's financial operations.
- **Detective** – controls designed to detect and subsequently correct errors or irregularities in the Company's financial operations.

The purpose of the Company's internal controls

The Company's Internal Control Standards will be designed to provide the following:

1. Administrative controls, including the plan of organization and the procedures and records that are concerned with the decision processes leading to the Company's authorization of transactions. Administrative controls are methods and procedures that are concerned mainly with operational efficiency and adherence to managerial policies and usually relate only indirectly to the financial records.

2. Accounting controls, which are methods and procedures that are concerned with, and related directly to, safeguarding of assets and the reliability of the financial records.
3. Controls to prevent the use of casino gaming for criminal purposes or for purposes of the laundering of the proceeds of crime.
4. Control over all matters related to the playing and operation of casino games and gaming machines on the licensed premises.
5. Organizational charts, job descriptions and staffing levels.

The following gaming areas will be included as part of the Internal Controls and will include; however, are not limited, to the following controls:

- Accounting:
 - Accounting Records
 - Forms, Records of Documents
 - Storage of Unused Controlled Forms
 - Table Games Audit Procedures
 - Slots Audit Procedures
 - Cage Audit Procedures
 - Complimentary Accounting
 - Signature Requirements
- Cage:
 - Security of the Cage and Main Bank/Vault
 - Cage/ Main Bank Accountability
 - Accounting Controls
 - Cash Equivalents
 - Exchange of Chips
 - Credit/Marker Issuance Transactions
 - Front Money (Safekeeping) and Deposits/Withdrawals
 - Personal Checks
 - Cage/Jackpot Checks
 - Wire Transfers
 - Unsecured Funds
 - Self-Redemption Units
 - Count Room Security
 - Table Drop Boxes and Slot Bill Validators

- Emergency Drop
 - Drop Box Count Procedures
 - Inventory of Secondary and Reserve Chips

- Credit
 - Credit Application
 - Credit File
 - Access to Credit Documentation
 - Credit Approval Process
 - Suspension of Credit
 - Limit Increases
 - Credit Approvers
 - Credit / Marker Issuance Transactions
 - Returned Items
 - Collection Activities
 - Returned Item Payment Standards
 - Settlements
 - Write-Offs

- Information Technology
 - System Security
 - Data Protection and Storage

- Slots
 - Pouch Pay Procedures
 - Overrides
 - Voids
 - Tips/Tokes
 - Slot Entries, Machine, and Changes
 - Ticketing Procedures
 - Unclaimed Winnings

- Table Games
 - Chips, Card and Dice; specifications, receipt, storage, inspections, and removal from use
 - Handling of cash at gaming tables
 - Table inventory
 - Opening/Closing of gaming tables
 - Progressive payouts

- Manual Fills/Credits
- Computerized Fills/Credits
- Table Marker
- Table layouts
- Required personnel for specific table games
- Minimum and maximum table game wagers
- Table games jackpot
- Poker room
- Tips and Gratuities
- Rules by Game Type
- Poker Promotional Funds

- Internal Audit
 - Audit Work Performed
 - Unannounced Observations
 - Audit Findings
 - Audit Report
 - Follow Up
 - Record Retention

- Sensitive Keys
 - Sensitive Key Control
 - Broken Sensitive Key
 - Electronic Box Alarms
 - Replacement of a Sensitive Key
 - System Failure
 - Manual issuance of keys
 - Manual return of keys
 - Custody of Sensitive Keys
 - Duplicate Keys
 - Inventory
 - Destruction of keys and locks

- Promotions
 - Coupon and Voucher Minimum Requirements
 - Coupons Wagered at Table Games Match Play Coupons
 - Deferred Vouchers
 - Exchange Voucher
 - Coupon Redemption

- Coupon/Voucher Audit for Verification
 - Electronic Promotion

- Security

- Surveillance

- Title 31 & Anti-Money Laundering

- Compliance

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Projected Table of Organization

Projected organization and staffing levels for Accounting, Compliance, Internal Audit, Surveillance and Security are provided in the table below:

Department	Position	Staffing Level (estimated*)	Comment
Accounting	Vice President of Finance	1	
	Director of Finance	1	
	Financial Controller	1	
	Supervisor (Records)	1	
	Property Accountant	2	
	Records Coordinators	3	
Cage	Casino Controller	1	
	Shift Manager	5	
	Supervisor	16	
	Cashier	98	
	Cage Coordinator	5	
Count Room	Supervisor	1	
	Count Room Lead	4	
	Count Team Members	34	
Compliance	Regulatory Compliance Officer	1	Responsible for communications with the Commission
	Regulatory Compliance Analyst	1	
Internal Audit	Senior Auditor	1	
	Staff Auditor	1	
Security	Director	1	
	Shift Manager	3	
	Supervisor	7	
	Ambassadors/Officers	200	
	Dispatcher	6	
Surveillance	Director	1	
	Shift Supervisor	3	
	Officers	23	
	Surveillance Technician	2	
*Dependent on property layout, slot and table positions, regulations, and final ICS, etc.			

