

Mohegan Sun at the Concord

COMPULSIVE AND PROBLEM GAMBLING
PLAN

June 2014

5-23-6 Compulsive Gambling Plan

December 31, 2013

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POLICY: 1

Goals of Mohegan Sun at the Concord's Compulsive and Problem Gambling Plan and procedures and timetables to implement the plan.

Mohegan Sun at the Concord has developed, and will maintain, amend and adjust as necessary, the goals, procedures and timetables of this CPG Plan as outlined below. The procedures set forth in this CPG Plan and its attachments will be followed by the designated employees. The Compulsive and Problem Gambling Plan will be implemented on or before the opening of the casino.

All employees of Mohegan Sun at the Concord are expected to be knowledgeable of, and follow approved procedures consistent with, this CPG Plan. As part of their new employee orientation and annually as reinforcement training, all employees will receive training on the scope, practice and procedures of this CPG Plan as well as training on the CPG Plan itself.

The Compulsive and Problem Gambling Plan will be implemented upon the opening of the facility.

Mohegan Sun at the Concord will:

1. Educate all employees on responsible gaming.
2. Educate all employees on how to recognize some signs of compulsive and problem gambling.
3. Educate all employees on the social and economic costs of compulsive and problem gambling.
4. Educate all employees regarding the relationship between compulsive and problem gambling and other addictive behaviors.
5. Educate all employees on where to locate and how to provide compulsive and problem gambling literature to patrons seeking such information.
6. Educate all employees on the process of reaching out to a patron suspected of compulsive and problem gambling and deliver problem-gambling literature on voluntary treatment services.
7. Make publicly available to patrons brochures and other literature describing responsible gaming, explaining characteristics of compulsive and problem gambling, and where to find professional assistance and/or treatment.
8. Prevent underage gambling.
9. Prevent gambling by intoxicated patrons.

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10. Conspicuously place signage bearing the toll-free helpline number for the HOPELINE (1-877-7-HOPENY) as specified in the section titled *Plans for posting signs*.
11. Serve alcoholic beverages responsibly.
12. Advertise responsibly and to avoid using individuals who appear to be under 21 years of age in advertisements.
13. Educate all employees regarding self-exclusion including where to direct a patron who requests to be self-excluded.
14. Establish effective procedures to ensure that all regulations (concerning self-exclusion) are complied with.
15. Mandate attendance at employee orientation and mandate attendance at annual reinforcement trainings regarding compulsive and problem gambling.
16. Ensure that orientation and annual reinforcement training is conducted by a person with specialized knowledge, skill, training and experience in responsible gaming employee training programs as evidenced by the curriculum vitae. Departmental specific training is conducted by Department Directors.

POLICY: 2

The Compulsive and Problem Gambling Committee is responsible for crafting, assessing and amending, as necessary, policies related to responsible gambling in accordance with regulations promulgated by the New York State Gaming Commission.

The Compulsive and Problem Gambling Committee is charged with senior oversight of the CPG Plan and ensuring that it can be and is effectively implemented. The Compulsive and Problem Gambling Committee shall monitor, adjust, and respond to concerns involving the maintenance of the Compulsive and Problem Gambling Plan and ensure meaningful compliance therewith.

The Compulsive and Problem Gambling Committee shall be chaired by the President and General Manager, Vice President of Administration, Director of Human Resources, General Counsel or Assistant Counsel, Director of Operational Accounting, Director of Security, and Director of Surveillance.

POLICY: 3

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Commitment to train employees and annual reinforcement training.

Mohegan Sun at the Concord will educate all employees regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons. All employees of Mohegan Sun at the Concord will be trained in accordance with the employee training program (X.A.1.2). Food and Beverage, as well as Security Department employees, will be trained in responsible alcohol service. Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan. Directors of individual departments will be responsible for creating and conducting their respective departmental trainings including procedures set forth in this CPG Plan. The compulsive and problem gambling training program includes training regarding:

1. Characteristics and symptoms of compulsive behavior, including compulsive and problem gambling.
2. The relationship of compulsive and problem gambling to other addictive behavior.
3. The social and economic consequences of compulsive and problem gambling, including debt, treatment costs, suicide, criminal behavior, unemployment and family counseling.
4. Techniques to be used when compulsive and problem gambling is suspected or identified.
5. Techniques to be used to discuss compulsive and problem gambling with patrons and advise patrons regarding community, public and private treatment services.
6. Procedures designed to prevent serving alcohol to visibly intoxicated gaming patrons.
7. Procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
8. Procedures for the dissemination of written materials to patrons explaining the self-exclusion program.
9. Procedures for removing an excluded person, an underage individual or a person on the self-exclusion list from a licensed facility including, if necessary, procedures that include obtaining the assistance of appropriate law enforcement personnel.
10. Procedures for preventing an excluded person or a person on the self-exclusion list from being mailed any advertisement, promotion or other target mailing no later than 5 business days after receiving notice from the Board that the person has been placed on the excluded person or self-exclusion list.
11. Procedures for preventing an individual under 21 years of age from receiving any advertisement, promotion or other target mailing.
12. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from having access to or from receiving complimentary services or other like benefits.

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13. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from cashing checks.

Prior to beginning their assigned duties, all new employees will spend one hour in classroom lecture with sole and specific dedication to the issues of compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons.

All employees will spend one hour annually in reinforcement training with sole and specific dedication to the issues of compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons.

Alcoholic beverage service staff and appropriate supervisory staff from the Security and Food and Beverage Departments will be trained in the responsible alcoholic beverage service policies and procedures.

POLICY: 4

Duties and Responsibilities of Employees Designated to Implement or Participate in the Plan.

The following sets forth the duties and responsibilities, by department, of employees designated to implement or participate in the plan.

1. All employees of Mohegan Sun at the Concord are expected to be knowledgeable of, attend trainings and follow approved procedures consistent with, the CPG Plan. This includes reporting suspected or identified compulsive or problem gamblers to a supervisory employee. Employees are required to keep the identity of an individual suspected of compulsive or problem gambling confidential.
2. The Compulsive and Problem Gambling Committee shall engage, on a contractual basis a

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person or business with specialized knowledge, skill, training and experience in responsible gaming employee training programs to conduct the orientation and reinforcement trainings as set forth in the Plan.

3. The Committee shall engage as necessary, a person or business with specialized knowledge, skill, training and experience in responsible gaming to create, provide and/or review the literature/brochure content.
4. Periodically, as requested by The Compulsive and Problem Gambling Committee audits and reviews will be conducted regarding self-exclusion/exclusion lists, the training program, literature/brochure content, and literature/brochure availability and accessibility. The Committee shall periodically initiate and review reports, metrics, effectiveness and regulatory compliance of the program through the Compliance and Audit teams.
5. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Security is responsible for the enforcement and reporting of operational efforts, which relate to the prevention of underage gambling, intoxicated gambling, and gambling by excluded and self-excluded persons. This includes identifying and removing underage, intoxicated, excluded and self-excluded persons, and, where possible, preventing entry onto the gaming floor by such persons. The Security department shall also be responsible for distribution of updates to the self exclusion and exclusion lists. Procedures for the Security Department are set forth in this plan.
 - b. **Surveillance Department**-Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Director of Surveillance and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patron intoxication, patrons appearing under the age of 21 who are on the gaming floor and/or are engaged in gaming activities and visual identification of excluded and self-excluded persons. Procedures for the Surveillance Department are set forth in this plan.
 - c. **Slots Department**-Slots Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior and identification of underage and intoxicated individuals and the prevention of underage and intoxicated gaming. Slot attendants are also responsible for verifying identification of individuals prior to payment of a hand paid jackpot to ensure that the individual is not underage or on the self-exclusion or exclusion list. Procedures for the Slots Department are set forth in this plan.
 - d. **Table Games Department**-Table Games Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior and identification of underage and intoxicated individuals and the prevention of underage and intoxicated gaming. Table Games employees are also responsible for verifying identification of

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individuals to ensure that an individual is not underage or on the self-exclusion or exclusion list. Procedures for the Table Games Department are set forth in this plan.

- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are underage or on the self-exclusion, exclusion or voluntary credit suspension lists do not receive credit. The credit department will receive the voluntary credit suspension list from the New York State Gaming Commission.
- f. **Cashier's Cage**-Cashier's Cage is responsible for preventing underage individuals and individuals on the exclusion and self-exclusion lists from cashing checks and conducting certain transactions at the cage including the extension of credit. Procedures for verification are set forth in this plan.
- g. **Marketing Department**-Marketing is responsible for ensuring that no individuals who are underage or are on the excluded or self-excluded lists receive player cards, player club privileges, complimentary services or direct mail marketing materials. Marketing is responsible for ensuring that excluded and self-excluded individuals are entered into the ACSC system, and flagged, within 5 business days of Mohegan Sun at the Concord's receipt of the lists from the New York State Gaming Commission. Procedures for Marketing are set forth in this plan.
- h. **Food and Beverage Department**-Food and Beverage is responsible for preventing the serving of alcohol to visibly intoxicated gaming patrons and underage individuals and for notifying security to prevent persons from gaming after having been determined to be visibly intoxicated. Procedures for Food and Beverage are set forth in this plan.

POLICY: 5

The Responsibility of Patrons with Respect to Responsible Gambling.

1. Mohegan Sun at the Concord will utilize a brochure, which provides patron responsibilities regarding responsible gambling (X.A.1.3).
2. Nine areas of responsible gaming include:
 - a. Gambling for entertainment purposes.
 - b. Treating the money lost as the cost of entertainment.
 - c. Setting a dollar limit and sticking to it.
 - d. Setting a time limit and sticking to it.
 - e. Expecting to lose.
 - f. Creating balance in your life.
 - g. Avoiding "chasing" lost money.
 - h. Not gambling as a way to cope with emotional or physical pain.

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- i. Becoming educated about the warning signs of problem gambling.
3. All brochures and related material will be provided at various locations throughout the facility.

POLICY: 6

Procedures to Identify Patrons and Employees with Suspected or Known Compulsive and Problem Gambling Behavior.

Mohegan Sun at the Concord educates all employees regarding signs, symptoms and procedures to be utilized to identify patrons and employees with suspected or known compulsive and problem gambling behavior pursuant to the compulsive and problem gambling plan training (X.A.1.2). Employees are trained to recognize some of the potential behavioral, verbal, social, legal, economic and emotional characteristics that may indicate that a patron may have a gambling problem.

Employees will not diagnose an individual as having a gambling problem. Compulsive gambling is often referred to as a hidden addiction and therefore, identification of compulsive and problem gambling behavior may be difficult for non-mental health personnel. The inaccurate identification of compulsive and problem gambling can lead to faulty assumptions, violations of privacy, or possibly the assignment of an inaccurate stigmatizing label by a non-professional.

POLICY: 7

Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee.

Mohegan Sun at the Concord educates all employees regarding procedures to report suspected compulsive or identified problem gamblers to designated key employees or other supervisory employees. Reporting by employees shall be oral reporting unless otherwise specified herein. All employees are required to keep the reporting of suspected or identified problem gamblers confidential. An identified problem gambler includes an individual on the self-exclusion list who has self-identified himself/herself as a problem gambler as set forth in the Request for Voluntary Self-Exclusion from Gaming Activities (X.A.1.4).

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1. If any employee has identified a compulsive or problem gambler (the individual is on the self-exclusion list) he/she shall contact security immediately. Security will proceed pursuant to the procedures set forth in the section titled *Procedures to prevent self-excluded persons from gambling*.
2. If any employee suspects a patron has a gambling problem, he/she shall orally notify his/her supervisor immediately with specific concerns regarding the behavior exhibited or oral statements made. The report of concern to the supervisor should include (if possible) the patron's name and specific reasons for concern. The concern should not be entered into the player tracking system.
3. Employees should ask themselves, before reporting:
 - a. Am I concerned?
 - b. Are there security or service issues involved?
 - c. Is my concern based on statements?
 - d. How quickly should I report my concern?
4. Supervisors shall follow the steps below or contact the Director of Security or Security Shift Supervisor.
5. The Director of Security/Security Shift Supervisor will evaluate the facts and circumstances presented and make a determination if the patron should be approached. If an approach is warranted, the Director of Security/Security Shift Supervisor shall casually approach the patron to assess the situation. If possible, inquire about the day, the weather or other "small talk." If the person seems receptive, attempt to suggest a conversation in a private setting. Express concern and offer alternatives for assistance such as written materials explaining self-exclusion, problem gambling brochures and problem gambling treatment and assistance resources (Attachments X.A.1.3, X.A.1.4, X.A.1.5) as set forth in the next section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*. Always protect privacy of the patron.
6. If the person is not receptive, walk away.
7. If the Director of Security/Security Shift Supervisor is not comfortable approaching a patron or is uncertain whether the situation warrants patron contact, he/she should contact the Manager on Duty, who will follow the procedures set forth above.
8. Refer all relevant information to officials of the Security Department, who shall document it in an Incident Report, which is treated as a confidential document.

POLICY: 8

Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior.

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Mohegan Sun at the Concord will make available to all patrons printed material to inform patrons about compulsive and problem gambling, responsible gaming, the self-exclusion program and treatment options (Attachments X.A.1.3, X.A.1.4, X.A.1.5).

1. Mohegan Sun at the Concord will post signage within 50 feet of each entrance and exit of the facility and on each ATM, cash dispensing and change machine within the facility as set forth in the section titled *Plans for posting signs*.
2. Mohegan Sun at the Concord will provide items 'a', 'b', 'c', and 'd' in display cases located at the Security Podium and Security Office, Momentum Club Booth, Credit Booth and each Cashier Cage. The other listed items will be provided to guests upon their request:
 - a. Responsible Gaming brochure
 - b. Compulsive and Problem Gambling brochure
 - c. Self-Exclusion Program Brochure
 - d. Voluntary Credit Suspension Brochure
 - e. Request for Voluntary Self-Exclusion form
 - f. Treatment provider list
 - g. Gamblers Anonymous New York Directory
 - h. New York State Council On Compulsive Gambling
3. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
4. The Director of Security/Security Shift Supervisor may provide the above referenced information pursuant to the section titled *Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee*.
5. All employees should be able to refer patrons to the backside of all Player Cards, which provides the phrase: (Problem Gambling Programs Work, Call 1-800 426-1234)

POLICY: 9

Procedures for responding to patron requests for information.

Mohegan Sun at the Concord will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the self-exclusion program, the voluntary credit suspension program, and treatment options.

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1. Mohegan Sun at the Concord will provide items 'a', 'b', 'c', and 'd' in display cases located at Casino Security Podium and Security Office, Momentum Club Booth, Credit Booth and each Cashier Cage. The other listed items will be provided to guests upon their request:

a.	Responsible Gaming brochure
b.	Compulsive and Problem Gambling brochure
c.	Self-Exclusion Program Brochure
d.	Voluntary Credit Suspension Brochure
e.	Request for Voluntary Self-Exclusion form
f.	Treatment provider list
g.	Gamblers Anonymous New York Director
h.	New York State Council On Compulsive Gambling

2. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
3. All employees should be able to refer patrons to the information on the backside of all Player Cards, which provides the phrase "Problem Gambling Programs Work, Call 1 800 426-1234".
4. Requests for information should never be entered into the player tracking system.

POLICY: 10

Procedures to keep the identity of an individual suspected of problem gambling confidential.

All employees are required to keep the identity of an individual suspected of problem gambling confidential.

1. Except for the procedures set forth in the section titled *Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee* and the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior* employees shall not discuss or disclose the identity of an individual that he or she suspects has a gambling problem.
2. Employees may discuss the identity of such individuals with their supervisor, security and if necessary, the Manager on Duty, however the identity should never be discussed or disclosed to any other employee of Mohegan Sun or individual who is not one of the designated employees unless directed to do so by any of the above referenced individuals or

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a New York State Gaming Commission employee.

POLICY: 11

Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available.

Mohegan Sun at the Concord will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the voluntary credit suspension program, the self-exclusion program and treatment options and will review and update the printed materials as necessary.

1. Mohegan Sun at the Concord will post signage as set forth in the section titled *Plans for posting signs*.
2. Mohegan Sun at the Concord will provide printed information in display cases located at Casino Security Podium and Security Office, Player's Club Booth and each Cashier Cage.
3. On the backside of all Momentum Cards, on the website, in racing programs and on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio and television, Mohegan Sun at the Concord will print and/or provide the phrase "Problem Gambling Programs Work, Call NYS HOPEline at 1-877-846-7369."

POLICY: 12

Placeholder

POLICY: 13

List of community, public and private treatment services.

Mohegan Sun at the Concord will provide or direct patrons to the location of printed material to inform patrons about treatment options (X.A.1.5 is an example of our Massachusetts list of counseling services) and will review and update the printed materials as necessary. Providing this list **does not** create a duty for Mohegan Sun at the Concord or its employees to refer compulsive and problem gamblers to qualified treatment professionals.

1. Mohegan Sun at the Concord will provide the list of community, public and private treatment services pursuant to the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*, the section titled

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Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available and upon request.

2. Mohegan Sun at the Concord will provide such information located at Casino Security Podium and Security Office Player's Club Booth and each Cashier Cage, upon patron request.

POLICY: 14

Certification process to verify that each employee has completed the required training and annual reinforcement training

Mohegan Sun at the Concord will educate all employees regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons. All employees of Mohegan Sun at the Concord will be trained in accordance with the employee training program (X.A.1.2). Appropriate employees, as specified herein, will be trained in to recognize responsible drinking. Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan.

1. Verification of attendance at training and annual reinforcement training regarding compulsive and problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons and the identification and ejection of excluded and self-excluded persons will be demonstrated on "sign-in" and "sign-out" sheets which will be completed by the employee at the trainings. This record of training attendance will be kept on file in the Human Resources Department.
2. Verification of responsible alcohol training will be demonstrated pursuant to the appropriate certification process. This record of training attendance will be kept on file in the Human Resources Department.
3. Verification of departmental specific training regarding policies and procedures as set forth in this Plan will be demonstrated on "sign-in" and "sign-out" sheets which will be completed by the employee at the trainings. This record of training attendance will be kept on file in the Human Resources Department.
4. Certificates of training completion, for initial and annual reinforcement trainings for compulsive, will include the employee's printed name and employee signature above the following phrase; "has successfully completed employee training in the area of problem and compulsive gambling".
5. Additionally, the signature of the organization's President and General Manager, and the date

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of the training will be affixed to the certificate (X.A.1.6 is an example of our Massachusetts certificate). The certificate of training completion will be awarded after verification of “sign-in,” “sign-out” procedures and be kept in the employees personnel file.

POLICY: 15

Procedures to prevent underage gambling.

Persons under the age of twenty-one (21) (“underage”) are prohibited from gambling, or traversing the gaming floor. Underage persons may transverse the gaming floor utilizing pathways that have been specifically excluded from the gaming floor, as approved by the Board, with an adult over the age of 21 and a security escort

An individual 18 years of age or older employed by a slot machine licensee, a gaming service provider, the board or any other regulatory or emergency response agency is not considered to be underage while engaged in the performance of the individual’s employment duties.

1. Mohegan Sun at the Concord will prominently post signage within 50 feet of each entrance and exit of the gaming floor signage related to underage gambling as set forth in the section titled *Plans for posting signs*.
2. Prior to entering the gaming floor, all patrons who appear under the age of 30 will be asked, by security officers, to verify their age by producing valid, legally acceptable government issued photo identification.
3. Legally acceptable government issued identification must include a photograph and date of birth:
 - a. A valid photo driver’s license issued by the New York State Department of Transportation or any other state.
 - b. A valid Alcohol Beverage Control Card.
 - c. A valid photo identification issued by the New York State Department of Transportation or any other state.
 - d. A valid Armed Forces identification card that contains the holder’s photograph.
 - e. A valid passport or visa, which contains the holder’s photograph.
 - f. Any other form of valid government issued identification (Green Card, Merchant Marine Identification, foreign driver’s license, etc., that has been verified in an identification book or database).
4. Security will not permit an individual to enter or transverse the gaming floor without having

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presented a valid, legally acceptable government issued photo identification that indicates that the individual is at least 21 years of age, however, individuals under 21 may transverse the gaming floor utilizing pathways that have been specifically excluded from the gaming floor if accompanied by an adult 21 years of age or older **and** with an escort of the Security Department, subject to approving the procedure with the New York State Gaming Commission. Underage individuals may only be escorted to a restaurant, retail shop, banquet facilities or other non-gaming amenity.

5. Any patron, who appears to be under the age of 30, that seeks to initiate play at a gaming table, will be asked by table game personnel to verify his or her age by producing valid, legally acceptable government issued identification. If such a patron does not verify that he or she is at least 21 years of age, table game personnel will not permit the patron to commence play at the gaming table and will notify security that the patron should be removed from the gaming floor.

Any employee who suspects that an individual on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaging in gaming activities is underage shall immediately notify the Security Department who will enact the security procedures related to underage gambling as set forth in the Security Department duties and responsibilities below.

6. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Security is responsible for the enforcement and reporting of operational efforts, which relate to the prevention and identification of underage gambling.
 - 1) Prior to entering the gaming floor, or areas off the gaming floor where contests or tournaments are conducted, all patrons who appear under the age of 30 will be asked, by security officers, to produce valid, legally acceptable government issued photo identification, to verify their age/identification.
 - 2) Security will require all patrons who are on the gaming floor or in areas off the gaming floor where contests or tournaments are conducted and who appear to be under the age of 30 to produce valid, legally acceptable government issued photo identification, to verify their age/identification.
 - 3) Upon identification by security, or notification by any employee, of an underage individual who is on the gaming floor, gambling or not, security officers will approach, engage, and verify the age of the patron in question by requesting legally

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- acceptable government issued photo identification as outlined above.
- 4) If the patron is underage, or cannot produce legally acceptable government issued photo identification, the security officer(s) will immediately contact the Casino Compliance Representative on duty, New York State Police (NYSP) and surveillance. The underage individual will be escorted off the gaming floor by the security officer(s) and/or PSP and/or the Casino Compliance Representative. If the underage individual was engaging in gaming activities, security and/or the Casino Compliance Representative on duty will facilitate “cash out” of the slot machine prior to initiation of the escort. The underage individual will be removed to the NYSP offices for processing. Security and/or the Casino Compliance Representative on duty will confiscate all the winnings, and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the New York Gaming Commission upon request.
 - 5) The Director of Security may complete a formal eviction form for the individual who will be advised that subsequent violations will result in an arrest for trespass. The involved security officer(s) will document this event on an incident report and forward to the Shift Supervisor. The Shift Supervisor will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to the Director of Security for review and signature, and the Director of Security will ultimately forward a copy of the report to the Assistant Counsel, who will handle all issues related to required reporting and remittance of any winnings.
 - 6) The Director of Security or, in his absence, his designee will notify the Enforcement Bureau of the New York Gaming Commission within 24 hours of the identification of an underage individual who has engaged in gaming activities.
- b. **Surveillance Department**-Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Director of Surveillance and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patrons appearing to be underage who are on the gaming floor and/or are engaged in gaming activities.
- 1) Upon identification, or notification, of an individual suspected to be underage, the surveillance personnel shall notify the Director of Security/Security Shift Supervisor who will enact the security procedures related to underage gambling as set forth above.
 - 2) Surveillance personnel will immediately track the individual on the gaming floor or

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- areas off the gaming floor where contests or tournaments are conducted to advise Casino Compliance Representative if the individual had engaged in gaming activities.
- 3) The Director of Security/Security Shift Supervisor will document the incident and notification efforts on an incident report and will provide a copy of the surveillance tape/disc and timeline to the Casino Compliance Representative with a copy of the incident report.
- c. **Slots Department**-Slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants will verify the age of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a hand paid jackpot to ensure that the individual is at least 21 years of age.
- 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be underage, the slot attendant will immediately notify Security personnel, who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify underage individuals and prevent underage gaming. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not underage.
- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be underage, the employee will immediately notify Security personnel who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are underage do not receive credit.
- 1) If a patron cannot produce legally acceptable government issued photo identification

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- showing proof of age, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Credit Executive.
- 2) If the Credit Executive is unable verify the age of the individual, he will notify Security Director/Security Shift Supervisor who will enact the security procedures related to underage gambling as set forth above.
- f. **Cashier's Cage**-All cage cashiers will request legally acceptable government issued photo identification as proof of age and will check the identification against the player tracking system prior to processing check cashing privileges, cashing of vouchers, cashing of gift certificates/cards, customer deposits creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips.
- 1) If a patron cannot produce legally acceptable government issued photo identification showing proof of age, the cashier will not proceed with the transaction and will immediately notify the Cashier's Cage Shift Supervisor.
 - 2) If the Cashier's Cage Shift Supervisor is unable verify the age of the individual, he will notify the Security Department, who will enact the security procedures related to underage gambling as set forth above.
 - 3) The Cashier/Cage Department will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the New York State Gaming Commission requests remittance.
 - 4) The Security Director/Security Shift Supervisor will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department**- Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Momentum Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested, but, but both addresses will be listed in the system. A Momentum Card will not be issued to an individual under 21. Only Momentum members will be eligible for promotions, complimentary services, awards and drawings and targeted mailings.
- 1) At the time of Momentum Program registration, a patron must provide legally acceptable government issued photo identification, sign the back of the card and establish a PIN number for their individual subsequent use. Since the Momentum

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- card number and PIN number are integrated into the player tracking system, no self-redemption or use of the points on the Momentum Card can occur without the use of a valid card and the PIN number.
- 2) In addition, individuals under the age of 21 are precluded from accessing the gaming floor without a Security escort, and will not be permitted to use the self-redemption kiosks or any gaming device.
 - 3) Only valid Momentum members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification showing proof of age.
 - 4) Upon identification, or notification of an individual suspected to be under 21, marketing personnel will immediately notify the Security Department, who will enact the security procedures related to underage gambling as set forth above.
 - 5) The Security department will document the incident and notification efforts on an incident report.
- h. ***Food and Beverage Department***-Although security officers will be asking anyone who appears to be 30 years or age or under for identification, food and beverage staff who have patron contact may challenge any patron, whether on or off the gaming floor, attempting to purchase alcohol. In addition, food and beverage staff who have patron contact will notify a Security Officer if a patron appears to be under 21 years of age and is on the gaming floor or consuming or attempting to consume alcohol. Food and beverage personnel with patron contact will notify the Security Department, who will enact the security procedures related to underage gambling as set forth above. The Director of Security/Security Shift Supervisor will document the incident and notification efforts on an incident report.

POLICY: 16

Procedures to prevent excluded persons from gambling.

Mohegan Sun at the Concord prohibits excluded persons from gambling.

1. Mohegan Sun at the Concord shall maintain electronic and hard copies of the most current version of the Exclusion List published by the New York State Gaming Commission and distribute to the appropriate personnel. The list distribution and appropriate personnel include the following:
 - a. Receipt of the list, as well as additions, deletions, changes and other updates, is

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- acknowledged by the Security Director or his designee to the Casino Compliance Representative.
- b. The Administrative Assistant of the Security department, within 2 business days of receipt of the list, disperses the list and additions, deletions, changes and other updates to: the Marketing department, Surveillance department, Slots department, the Operational Accounting Department and the Legal Department. The Directors of the Security and Surveillance departments are responsible for ensuring all employees of those departments, except those exercising clerical and administrative duties, review the information and photographs of the Excluded persons at least weekly to become familiar with the appearance and physical description of each excluded person.
2. A hard copy of the exclusion list is kept at all security podiums, the Security Office, Surveillance Room and the offices of each department receiving a copy. Employees of Security and Surveillance will review the information and photographs of the Excluded persons at a minimum, weekly, to become familiar with the appearance, identity and physical description of each excluded person. This review will consist of employees reviewing at least 10% of the exclusion list at least twice weekly during roll calls in sequential fashion in order to examine the entire list on a rotating basis. In addition, hard copies of the exclusion list will be kept on file in both departments to allow employees to review the list on breaks.
 3. Excluded persons, who have been identified by the New York State Gaming Commission and placed on the list, will have their names entered on the player tracking system by the Director of Promotions or designee within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. If no player tracking system account exists for an individual on the exclusion list, the Promotions Manager will create an account and will simultaneously “flag” and disable the new account within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. In addition, the account will be flagged so that any complimentary points that may be due to the patron as a result of gaming play at Mohegan Sun at the Concord will be deleted, and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions. The person will further be excluded from the entire property, rather than simply the gaming floor, for the duration of their exclusion so as to maximize the impact of the exclusion.
 4. Any employee who suspects that an individual is on the Exclusion List, or is a person known to satisfy the criteria of a-d below, shall immediately notify the Security Department, who will enact the security procedures related to Excluded Persons as set forth below.

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4. The Assistant General Counsel shall inform the New York State Gaming Commission, in writing, of the names of persons that Mohegan Sun at the Concord believes are appropriate for placement on the exclusion list or a person who has been excluded or ejected because they meet one or more of the following criteria, and the reason for placement on the list:
 - a. A career or professional offender, whose presence in a licensed facility would, in the opinion of the Board, be inimical to the interest of the State or of licensed gaming therein, or both.
 - b. An individual with a known relationship or connection with a career or professional offender whose presence in a licensed facility would be inimical to the interest of the State or of licensed gaming therein, or both.
 - c. A person who has been convicted of a criminal offense under the laws of any state, or of the United States, which is punishable by more than 1 year in prison, or who has been convicted of any crime or offense involving moral turpitude, and whose presence in a licensed facility would be inimical to the interest of the State or of licensed gaming therein, or both.
 - d. A person whose presence in a licensed facility would be inimical to the interest of the State or of licensed gaming therein, or both, including:
 - 1) Cheats.
 - 2) Persons whose gaming privileges have been suspended by the Board.
 - 3) Persons whose Board registrations, certifications, permits, licenses or other approvals have been revoked.
 - 4) Persons who pose a threat to the safety of the patrons or employees of a licensed gaming entity.
 - 5) Persons with a history of conduct involving the disruption of the gaming operations within a licensed facility.
 - 6) Persons subject to an order of a court of competent jurisdiction in this State excluding those persons from licensed facilities.
 - 7) Persons with pending charges or indictments for a gaming or gambling crime or a crime related to the integrity of gaming operations in this State or another jurisdiction.
 - 8) Persons who have been convicted of a gaming or gambling crime or crime related to the integrity of gaming operations in this State or another jurisdiction.
 - 9) Persons who have performed an act or have a notorious or unsavory reputation that would adversely affect public confidence and trust in gaming, including, being identified with criminal activities in published reports of various Federal and State legislative and executive bodies that have inquired into criminal or organized criminal activities.

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6. Specific departments have duties and responsibilities as set forth below:

- a. **Security Department-** Upon notification or visual identification (e.g., via video surveillance or in-vivo) of a person suspected to be on the exclusion list, security officers will immediately contact the Director of Security or his designee for comparison and consultation of physical features/photographs consistent with those identified on the hard copy of the exclusion list published by the New York Gaming commission and entered into the player tracking system. If a comparison match is indicated, the Director of Security or his designee will verify the identification of the individual and will immediately contact the Casino Compliance Representative on duty and surveillance. The individual will be escorted off the gaming floor by Security and/or the Casino Compliance Representative. If the individual was engaging in gaming activities, security and/or the Casino Compliance Representative on duty will facilitate “cash out” of the slot machine prior to initiation the escort. The individual will be removed to the New York State Gaming Commission offices for processing. Security and/or the Casino Compliance Representative on duty will confiscate all the winnings, and Security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the New York State Gaming Commission upon request.
 - 1) The Director of Security or his designee will complete a formal eviction form for the individual and will be advised that subsequent violations will result in an arrest for trespass.
 - 2) The involved security officer(s) will document this event on the incident report and forward to the Director of Security.
 - 3) The Director of Security will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to the responding Security Officers for review and signature.
 - 4) The responding Security Officers will complete the necessary reports, logbooks, and paperwork within one hour of the incident, or within one hour of their return to work. However, in no case shall the completion and forwarding of the details of the incident to the Director of Security be greater than twenty four (24) hours from the occurrence of the incident.
 - 5) The Director of Security or, in his absence, his designee will notify the appropriate designee of the New York State Gaming Commission via email within 24 hours of the incident and will copy Assistant Counsel.

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- b. **Surveillance Department**- Surveillance personnel are responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and food and beverage areas in the facility. Surveillance will maintain a hard copy of the Exclusion list in the Surveillance room. The Director of Surveillance and surveillance personnel assigned to surveillance duties are responsible for becoming familiar with the photographs of the excluded persons and for monitoring these areas for excluded persons.
- 1) Upon identification, or notification, of an individual suspected to be on the Exclusion List, the Surveillance personnel shall notify the Director of Security or his designee, who will enact the security procedures related to excluded persons as set forth above.
 - 2) Surveillance personnel will immediately track the individual on the gaming floor or in areas off the gaming floor where contests or tournaments are conducted to advise Casino Compliance Representative if the individual had engaged in gaming activities.
 - 3) The Surveillance agent will document the incident and notification efforts on a surveillance log report and will provide a copy of the surveillance tape/disc and timeline to the Casino Compliance Representative with a copy of the incident report.
- c. **Slots Department**-All slot attendants are responsible for the visual monitoring of patron activity on the casino floor. The Slots Department will maintain current copies of the exclusion list in the Slots office. Slot attendants will verify the identity of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a hand paid jackpot and will verify, through the player tracking system, to ensure that the individual is not flagged as being on the exclusion list.
- 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be on the exclusion list, the slot attendant will immediately notify the Security Department who will enact the security procedures related to exclude persons as set forth above.
 - 2) The Security Department will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify excluded individuals. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not an excluded person.

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- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the exclusion list, the employee will immediately notify the Security personnel who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Security Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are on the exclusion list do not receive credit.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as an excluded person in the player tracking system, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Director/Security Shift Supervisor
- d. **Cashier's Cage**- All cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system prior to processing check cashing privileges, cashing of vouchers, cashing of gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as an excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Security Department.
 - 2) The Security Department who will enact the security procedures related to excluded persons as set forth above.
 - 3) The Cashier/Cage Department will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the New York State Gaming Commission requests remittance.
 - 4) The Director of Cage/Count or their designee will notify the security department, who will document the incident and notification efforts of the Cage on an incident report.
- e. **Marketing Department**- Excluded persons, who have been identified by the New York State Gaming Commission and placed on the list, will have their names and

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brief physical descriptions entered on the player tracking system by the Director of Promotions or designee within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Mohegan Sun at the Concord will be deleted, and the individual will not be permitted to redeem them and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.

- 1) Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Momentum Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested, but both addresses shall remain in the system.
- 2) A Momentum Card will not be issued to an individual who is flagged in the player tracking system as being excluded.
- 3) Only valid Momentum Club members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification.
- 4) Upon identification, or notification of an individual suspected to be on the exclusion list, marketing personnel will immediately notify the Security Department, who will enact the security procedures related to exclude persons as set forth above.
- 5) The Security Department will document the incident and notification efforts on an incident report.
- 6) The Marketing department will maintain current copies of the exclusion list in the Marketing Department office and all active promotions booths. .

POLICY: 17

Procedures to prevent self-excluded persons from gambling.

Mohegan Sun at the Concord prohibits self-excluded persons from gambling.

1. Mohegan Sun at the Concord will prominently post signage at all entrances to its facility indicating that a person who is on the self-exclusion list will be subject to arrest for trespassing if the person is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted or engaging in gaming activities as set forth in the section titled *Plans for posting signs within the facility*.
2. The prohibition against allowing self-excluded persons on the gaming floor or in areas off the

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gaming floor where contests or tournaments are conducted does not apply to an individual who is on the self-exclusion list if all of the following apply:

- a. The individual is carrying out the duties of employment or incidental activities related to employment,
 - b. Mohegan Sun at the Concord's security department and the New York State Gaming Commission have received prior notice,
 - c. Access to the gaming floor or areas off the gaming floor where contests or tournaments are conducted is limited to the time necessary to complete the individual's assigned duties, and
 - d. The individual does not otherwise engage in any gaming activities.
3. The New York State Gaming Commission maintains the official self-exclusion list and notifies Mohegan Sun at the Concord of additions, deletions, changes and other updates to the list by first class mail or electronically. The notice provided by the New York State Gaming Commission will include the following information concerning a person who has been added to the self-exclusion list:
- a. Name, including any aliases or nicknames.
 - b. Date of birth.
 - c. Address of current residence.
 - d. Telephone number.
 - e. Social Security number, when voluntarily provided by the person requesting self-exclusion.
 - f. Physical description of the person, including height, weight, gender, hair color, eye color and other physical characteristics that may assist in the identification of the person.
 - g. A copy of the photograph taken by the New York State Gaming Commission.
 - h. The notice provided to slot machine licensees by the New York State Gaming Commission concerning a person whose name has been *removed* from the self-exclusion list will include the name and date of birth of the person.
4. Mohegan Sun at the Concord shall maintain electronic and hard copies of the self-exclusion list provided by the New York State Gaming Commission and distribute to the appropriate personnel and shall maintain electronic and hard copies of the list of individuals whose name has been removed from the self-exclusion list.

The list distribution and appropriate personnel include the following;

- a. Receipt of the list, as well as additions, deletions, changes and other updates, is

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- acknowledged by Director of Security or his designee to the Casino Compliance Representative.
- b. The Administrative Assistant of the Security Department disperses the list and additions, deletions or other updates to the list within 2 business days of receipt of the list and updates from the New York State Gaming Commission to: the Surveillance department, Slots department, Marketing Department, Cash/Cage Department, Operational Accounting department and Legal department. The directors of the Security and Surveillance departments are responsible for ensuring that all employees of those respective departments, except those with clerical and administrative responsibilities, review the information and photographs of the self-excluded persons at least weekly to become familiar with the appearance and physical description of each self-excluded person.
 - c. Employees are required to keep the identity of an individual on the self-exclusion list confidential.
5. A hard copy of the self-exclusion list is kept at all security podiums, the Security Office, Surveillance Room and the offices of the departments receiving the list. Employees of Security and Surveillance will review the information and photographs of the self-excluded persons at a minimum, weekly, to become familiar with the appearance, identity and physical description of each self-excluded person.
 6. The Director of Promotions or designee will “flag” and disable the player tracking system account of a self-excluded individual within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Mohegan Sun at the Concord will be deleted, and the individual will not be permitted to redeem them. If no player tracking system account exists for an individual on the self-exclusion list, the Director of Promotions or designee will create an account and will simultaneously “flag” and disable the new account within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. In addition, the individual will be excluded from the entire property, rather than simply the gaming floor, to maximize the impact of the self-exclusion
 7. The Director of Promotions or designee will remove the “flag” and enable the player tracking system account of an individual who has been removed from the self-exclusion list within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. If the account was created for purposes of “flagging” the individual as self-excluded, then the account will be deleted upon removal of the individual from the self-

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exclusion list.

8. Employees will disseminate written materials to patrons explaining the self-exclusion program as set forth in the section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior* and the section titled *Procedures for responding to patron requests for information*.
9. Employees should direct an individual inquiring about self-exclusion to Security. Security DOES NOT do the intake, but should explain the highlights of the program (Security should be familiar with the FAQs of self-exclusion as set forth in the state's Self-Exclusion brochure). Security should contact the Casino Compliance Representative on duty or the appropriate Gaming Commission representative to make an appointment for the self-exclusion intake if the individual wants to request voluntary self-exclusion. Security should provide copies of the Forms to the individual. All contact with employees and security is to be kept confidential.
10. Specific departments have duties and responsibilities for which they will be trained as set forth below:
 - a. **Security Department-** Upon notification or visual identification (e.g., via video surveillance or in-vivo) of a person suspected to be on the self-exclusion list, security officers will immediately contact the Self Exclusion List for comparison and consultation of physical features/photographs consistent with those identified on the hard copy of the self-exclusion list published by the New York State Gaming Commission. If a comparison match is indicated, the Director of Security will verify the identification of the individual and will immediately contact the Casino Compliance Representative on duty, New York State Police and Surveillance. The individual will be escorted off the gaming floor by security and/or the Casino Compliance Representative and the New York State Police. If the individual was engaging in gaming activities, security and/or the Casino Compliance Representative on duty will facilitate "cash out" of the slot machine prior to initiation the escort. The individual will be removed to the New York State Gaming Commission offices or the offices of the New York State Police for processing. Security and/or the Casino Compliance Representative on duty will confiscate all the winnings and security will document the amount and submit the confiscated winnings to the casino cage for safekeeping. Winnings will be remitted to the New York State Gaming Commission upon request.
 - 1) The involved security officer(s) will document this event on an incident report and forward to the Director of Security, and will immediately inform Assistant General Counsel of the incident.

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- 2) The Director of Security will ensure that the incident report includes identification of all employees involved and the location of entry to the gaming floor, and will forward the report to Security Officers for review and signature, and the Director of Security ultimately forwards a copy of the report to the Assistant General Counsel.
 - 3) The Security Officers will complete the necessary reports, logbooks, and paperwork within one (1) hours of the incident, or within eight (8) hours of their return to work. However, in no case shall the completion and forwarding of the details of the incident to the Director of Security be greater than twenty four (24) hours from the occurrence of the incident.
 - 4) The Director of Security or, in his absence, his designee will notify the appropriate designee of the New York State Gaming Commission via email within 24 hours of the incident and will copy Assistant General Counsel.
- b. **Surveillance Department-** Surveillance is responsible for the electronic monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Surveillance Director and surveillance personnel assigned to surveillance duties are responsible for becoming familiar with the photographs of the self-excluded persons and for monitoring the abovementioned areas for self-excluded persons.
- 1) Upon identification, or notification, of an individual suspected to be on the Self-Exclusion List, the Surveillance personnel shall notify the Security Department who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) Surveillance personnel will immediately track the individual on the gaming floor to advise Casino Compliance Representative if the individual had engaged in gaming activities.
 - 3) The Surveillance Agent will document the incident and notification efforts in a log report and will provide a copy of the surveillance tape/disc and timeline to the Casino Compliance Representative with a copy of the incident report.
- c. **Slots Department-**All slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants will verify the identity of an individual by inspecting legally acceptable government issued photo identification prior to the payment of a hand paid jackpot and will verify, through the player tracking system, to ensure that the individual is not flagged as being on the self-exclusion list.
- 1) If any slot attendant identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gaming activities and is suspected to be on the self-exclusion list, the slot attendant will immediately notify the Security department who

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- will enact the security procedures related to self-excluded persons as set forth above.
- 2) The Security Department will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify self-excluded individuals. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not a self-excluded person.
- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the self-exclusion list, the employee will immediately notify Security personnel who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) The Security Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are on the self-exclusion list do not receive credit.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as a self-excluded person in the player tracking system, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Director/Security Shift Supervisor.
- f. **Cashier's Cage**- All cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system prior to processing check cashing privileges, cashing of vouchers, cashing of gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flagged as a self-excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Director of cage/Count or their designee.
 - 2) The Director of cage/Count will notify the Security Department, who will enact the security procedures related to self-excluded persons as set forth above.

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- 3) The Cashier/Cage Department will issue a receipt for confiscated winnings, redeem any vouchers that were confiscated (and retain copies of the vouchers) and will provide safekeeping of the redeemed winnings until the New York State Gaming Commission requests remittance.
 - 4) The Security Department will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department-** Individuals who are on the self-exclusion list will have their names and brief physical descriptions entered on the player tracking system by the Director of Promotions or designee within 5 business days after the day notice is mailed or transmitted electronically to Mohegan Sun at the Concord. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Mohegan Sun at the Concord will be deleted, and the individual will not be permitted to redeem them and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.
- 1) Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Momentum Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested, but both addresses will appear in the system.
 - 2) A Momentum Card will not be issued to an individual who is flagged in the player tracking system as being self-excluded.
 - 3) Only valid Momentum Club members will be eligible for promotions and targeted mailings. No complimentary services or other like benefits will be provided to an individual without valid government issued photo identification.
 - 4) Upon identification, or notification of an individual suspected to be on the self-exclusion list, marketing personnel will immediately notify the Shift Supervisor, who will notify the Security Department, who will enact the security procedures related to self-excluded persons as set forth above.
 - 5) The Security Department will document the incident and notification efforts on an incident report.

POLICY: 18

Procedures to prevent intoxicated patrons from engaging in gaming activities.

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Mohegan Sun at the Concord will prevent intoxicated patrons from engaging in gaming activities and will assist in arranging food and a safe departure or accommodations.

1. Mohegan Sun at the Concord has trained its Security and Food and Beverage employees who have patron contact in the responsible alcohol beverage service program as set forth in the policy titled *Commitment to train employees and annual reinforcement training* which includes procedures designed to prevent serving alcohol to visibly intoxicated gaming patrons and has established these procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
2. Visibly intoxicated patrons will be denied entry to the gaming floor and areas off the gaming floor where contests or tournaments are conducted by security officers stationed at entrances to prevent the patron from engaging in gaming activities and from entry to the gaming floor and areas off the gaming floor where contests or tournaments are conducted. The procedures outlined below will be followed to ensure that the intoxicated patron is denied entry to the gaming floor.
3. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department**-Upon visual observation or notification of any patron identified, or suspected to be visibly intoxicated, the security officer will notify Security Dispatch, if necessary, to dispatch additional security officers to assist in approaching the patron. Security officer(s) shall approach the patron, perform a status check, and make a determination if the patron appears to be visibly intoxicated (as set forth in responsible alcohol beverage service training materials).
 - 1) If the security officer or Security Supervisor determines the patron is visibly intoxicated, the security officer or Security Supervisor will explain to the patron they appear to be visibly intoxicated and advise the patron they are not be permitted to enter the gaming floor or areas off the gaming floor where contests or tournaments are conducted, or if located on the gaming floor or areas off the gaming floor where contests or tournaments are conducted, to stop drinking and leave the gaming floor. The security officer or Security Supervisor will remove the patron from the gaming floor to prevent the intoxicated patron from engaging in gaming activities. Any unfinished alcoholic beverage will be removed from the intoxicated patron to prevent any further consumption of alcohol. The security officer or Security Supervisor will assist the patron and suggest the patron visit a restaurant and/or take a break.
 - 2) If the patron refuses to give up their alcoholic beverage, refuses to leave the gaming floor or becomes unduly disruptive, the security officers will notify the New York

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- State Police assigned to Mohegan Sun at the Concord for further handling of the patron. If the intoxicated patron is interested in leaving the facility, security department personnel shall discuss with the patron driving arrangements, or overnight accommodations. If the patron attempts to leave the facility intoxicated, the Security Department will immediately notify the New York State Police
- 3) Security officers shall document the incident and interventions provided to the intoxicated patron on an incident report.
- b. **Surveillance Department**-Upon visual observation of a patron who appears to be visibly intoxicated, Surveillance personnel assigned to surveillance duties shall immediately contact the Security Department to engage the procedures as set forth above. The surveillance personnel assigned to surveillance duties will document the incident and notification efforts on an incident report.
- c. **Slots Department**-Upon observation of a patron who appears to be visibly intoxicated, slot attendants will immediately notify the Security department, who will enact the procedures as set forth above. The Security department will document the incident and notification efforts on an incident report.
- d. **Food and Beverage Department**-Although security officers will be asking anyone who appears to be 30 years or age or under for identification, food and beverage staff who have patron contact have the right to challenge any patron attempting to purchase alcohol. In addition, food and beverage staff who have patron contact will notify a Security Officer if a patron appears to be visibly intoxicated as set forth in the responsible alcohol beverage service training materials. Food and beverage personnel with patron contact will notify Beverage Personnel for alcohol service suspension/refusal of service once they have determined a patron is showing signs of intoxication and service to the patron has been suspended. Security officer(s) will assist in the suspension of service. They will inform the patron of New York State Liquor laws and security will enact the procedures as set forth above. The Security Department will document the incident and notification efforts on an incident report.

POLICY: 19

Procedures to ensure that certain individuals may not obtain credit

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Mohegan Sun at the Concord offers credit at its licensed facility. In order to ensure that individuals on the Voluntary Credit Suspension List (“VCS List”) do not obtain credit, Mohegan Sun at the Concord instituted the following procedures. Mohegan Sun at the Concord assumes that the Gaming Commission will hold the official voluntary list of credit suspensions, however, in the absence of such a list with the state, Mohegan Sun at the Concord will maintain its own internal listing with the Credit Department.

1. A New York State Gaming Commission casino compliance representative (“CCR”) will provide the Director of Security or, in his or her absence, the Administrative Assistant to Director of Security with the advisories of patrons who have requested Voluntary Credit Suspension. The Director of Security or, in his or her absence, the Administrative Assistant to Director of Security will, within 24 hours, forward the advisory to the Credit Department for processing.
2. The Credit Department will maintain a copy of the VCS List and will ensure that the copy of the list is updated within 24 hours after Mohegan Sun at the Concord receives the update(s) from the New York State Gaming Commission. The Credit Department will immediately suspend the credit privileges of any individual upon receipt of notice that the individual has been added to the voluntary credit suspension list.
3. A member of the Credit Department will check the player tracking system for the patron’s account and will flag the account to denote credit suspension. As a result, this patron can no longer receive credit from Mohegan Sun at the Concord. If the patron does not have an account with Mohegan Sun at the Concord, a member of the Credit Department will create a credit account for that patron in the player tracking system and will flag the account to denote the credit suspension. Hard copies of VCS Advisories will be placed in the patron’s credit file by a member of the Credit Department. A member of the Credit Department will note the patron’s Voluntary Credit Suspension in the patron’s credit file.
4. The New York State Gaming Commission retains the authority and responsibility to complete the Voluntary Credit Suspension /Reinstatement Form at Mohegan Sun at the Concord.
5. A New York State Gaming Commission representative will provide the Director of Security, or in his or her absence the Administrative Assistant to the Director of Security, with the advisories of patrons who have been removed from Voluntary Credit Suspension. The Director of Security or, in his or her absence, the Administrative Assistant to the Director of Security will forward the reinstatement advisory to the Credit Department for processing within 2 business days of receipt.

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6. A member of the Credit Department will remove the patron from all Mohegan Sun at the Concord's copies of the VCS List within 3 business days of receipt of the Voluntary Credit Reinstatement Advisory from the New York State Gaming Commission.
7. A member of the Credit Department will obtain the hard copy of the patron's credit file and re-verify the credit line pursuant to the procedures for establishing a casino credit line upon request for reinstatement by the patron.
8. A member of the New York State Gaming Commission, subject to their approval as the designated authority, will sign the Voluntary Credit Suspension / Removal Form, including the date and time of removal.
9. A member of the Credit Department will eliminate the credit suspension flag on the patron's account in the player tracking system.
10. A hard copy of the Credit Reinstatement Advisory along with a notation of the Credit Reinstatement Advisory will be placed in the patron's credit file
11. The VSC List will be posted in the Credit Department and Casino Cage.

POLICY: 20

Details of outreach program(s) offered to employees and other individuals

Mohegan Sun at the Concord offers the following outreach programs to its employees and other individuals as well as the following memberships and sponsorships:

- a. employee participation in contests and other activities designated to highlight awareness of compulsive and problem gambling issues;
- b. annual sponsorship of National Problem Gambling Awareness Week;

POLICY: 21

Plan for posting approved signs in the facility and materials offered to the public

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Mohegan Sun at the Concord will post the required signage throughout the facility and on information offered to the public. Signage will convey information in plain clearly understandable language. The statements and font size are submitted for approval by the Commission. For purposes of this section, the term "advertisement" means marketing materials including signs, billboards, print, radio and television advertisements, emails and any notice or communication to the public through broadcasting, publication, mailing or other means of dissemination. The Vice President of Marketing Director is responsible for reviewing all signs and materials offered to the public and for submitting signs and materials to the New York State Gaming Commission for approval.

1. Mohegan Sun at the Concord will post a minimum of 20 signs bearing the gambling assistance message which is the phrase: "Problem Gambling Programs Work, Call 1 800 426-1234". The signs shall be prominently posted at the following locations:
 - a. within 50 feet of each entrance and exit
 - b. On each ATM, cash dispensing and change machine in the facility.
2. Mohegan Sun at the Concord will print the gambling assistance message on all marketing or advertising materials that are offered to the general public, including signs, billboards, and print, radio and television advertisements.
3. Mohegan Sun at the Concord will post signs at all entrances to the facility indicating that "A person who is on the self-exclusion list will be subject to arrest for trespassing if the person is on the gaming floor or engaging in gaming activities".
4. Mohegan Sun at the Concord will post signs with the phrase "No person under the age of 21 is permitted on the casino floor." The signs will be prominently posted within 50 feet of each entrance and exit of the gaming floor.
5. Mohegan Sun at the Concord advertisements will not use or depict individuals who appear to be under 21 years of age.
6. Mohegan Sun at the Concord will discontinue as expeditiously as possible the use of a particular advertisement upon receipt of written notice from the New York State Gaming Commission that the Commission has determined that the use of the particular advertisement in, or with respect to, this State could adversely impact the public or the integrity of gaming, subject to the right of Mohegan Sun at the Concord to challenge that determination in an appropriate legal venue.
7. Mohegan Sun at the Concord advertisements will not (1) contain false or misleading information, (2) use a font, type size, location, lighting, illustration, graphic depiction or color obscuring any material fact or the gambling assistance message, or (3) fail to disclose

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any material conditions or limiting factors associated with the advertisement.

8. The height of the font used for the gambling assistance message in signs, direct mail marketing materials, posters and other print advertisements will be the greater of (1) at least the same size as the majority of the text used or (2) 2% of the height or width, whichever is greater, of the sign, direct mail marketing material, poster or other print advertisement.
9. The height of the font used for the gambling assistance message will be at least 5% of the height of the face of the billboard.
10. The height of the font used for the gambling assistance message for video and television advertisements will be at least 2% of the height of the image that will be displayed and will be visible for the entire time the video or television advertisement is displayed, unless a shorter time is approved by the New York State Gaming Commission.

POLICY: 22

Other policies and procedures intended to be used beyond what is required

Mohegan Sun at the Concord will continue, through the efforts of its Compulsive and Problem Gambling Committee, to identify and implement appropriate programs to support efforts to control compulsive and problem gambling.

POLICY: 23

Procedures to prevent cashing of certain checks for patrons.

Mohegan Sun at the Concord prohibits the cashing of any check except a personal check, a check issued to a patron by Mohegan Sun at the Concord and prohibits the cashing of any check payable to an individual, including Social Security, unemployment insurance, disability payment, public assistance payment or payroll check for a patron.

1. Mohegan Sun at the Concord cashes personal checks and checks issued by Mohegan Sun at the Concord to a patron for gaming purposes.
2. Personal checks will be cashed at the Casino Cage. Cashiers and Cage Management will only cash personal checks in accordance with the procedures outlined in Mohegan Sun at the Concord's approved Accounting and Internal Controls and as set forth in the policy titled *Procedures to prevent underage gambling*, policy titled *Procedures to prevent excluded persons from gambling* and policy titled *Procedures to prevent self-excluded persons from gambling*.

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3. Mohegan Sun at the Concord will not cash third party checks, checks from any government agency issued for any purpose, or paychecks.
4. No one in Mohegan Sun at the Concord Management or Ownership may authorize an exception to the cashing of only personal checks or checks issued to a patron by Mohegan Sun at the Concord.

POLICY: 24

Promotions and promotions advertising.

Mohegan Sun at the Concord will take the following steps prior to conducting any promotion:

1. Post the rules for the promotion at the Players' Club for public review, which include:
 - a. A description of what is being offered as part of the promotion
 - b. The date(s) and time(s) of the promotion
 - c. Eligibility requirements to participate in the promotion
 - d. What must be done to receive the promotion offer
 - e. The procedure to claim or redeem the promotion offer
 - f. The tagline "Problem Gambling Programs Work, Call HOPEline at 1-877-846-7369" on all printed materials
2. Marketing personnel will review the valid identification of any person who wishes to take part in any promotion to ensure that they are at least 21 years of age. In addition, all persons who wish to take part in any promotion are checked against the player tracking system to ensure that they are not on the self-exclusion/excluded persons list. All records generated from any promotion will be retained by Mohegan Sun at the Concord for a minimum of 5 years.
3. Mohegan Sun at the Concord may conduct a promotion that is limited to invited patrons only. In the event that the rules of a promotion are printed on any invitation that the invited patron would be required to present upon arrival at the facility, Mohegan Sun at the Concord will not post the rules of the promotion listed in item #1.

Advertisement Requirements

Mohegan Sun at the Concord will adhere to the following guidelines when conducting advertising of promotions:

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1. A description of what is being offered as part of the promotion
2. The date(s) and time(s) of the promotion
3. Eligibility requirements to participate in the promotion
4. What must be done to receive the promotion offer
5. The procedure to claim or redeem the promotion offer
6. Include the tagline “Problem Gambling Programs Work, Call 1 800 426-1234” on all printed materials

Required Notifications

At least two (2) business days prior to conducting a promotion, Mohegan Sun at the Concord will provide the previously referenced rules of the promotion to the designee(s) at the New York State Gaming Commission.

Prohibited Activities

Mohegan Sun at the Concord will not conduct any promotion or publish any advertisement which:

1. misrepresents the probability of winning the promotion offer, or is false, misleading or deceptive
2. is directed at minors
3. promotes the consumption of alcohol while gaming
4. violates any federal, state or local law

Mohegan Sun at the Concord will immediately discontinue the use of any promotion or advertisement upon receipt of written notice from the Commission to do so.