



# EXHIBIT VIII.D.1.a.

## INTERNAL CONTROLS AND SECURITY SYSTEMS

### Proposed Internal Controls

**The Commission will develop regulations governing internal controls for all gaming facilities in the near future. To assist the Board in its evaluation of the Applicant, the Board is interested in knowing what standards the Applicant anticipates adhering to at its Gaming Facility. Accordingly, subject to any adjustments required upon promulgation of the future regulations, submit as Exhibit VIII.D.1.a. a full description of the proposed internal controls, electronic surveillance systems, and security systems for the proposed Gaming Facility and any related facilities, including, for example, any contemplated internal audits, independent external audits, separation of accounting and cage processes for independent verifications, cage and count room supervision, gaming floor drop processes, and other asset preservation and secure cash handling systems and processes. Where third-parties are to be engaged (e.g., external audit and law enforcement/safety entities), so indicate. Indicate how these efforts will achieve risk management/control goals at the enterprise/Licensee level as well as regulatory, law enforcement, and other local, regional, State, and Federal levels as applicable.**

Subject to any adjustments required by the final promulgation of applicable regulations, Attachment VIII.D.1.a.-1 is a full description of Montreign Operating Company, LLC's proposed internal controls. They include a full description of the proposed internal controls by each operating area defining the transactional flow and controls for each area. The internal controls also define the responsibilities and reporting requirements of surveillance, internal audit and security. Included in the submission are controls to define the structure for Information Systems. The internal controls also include the federally required Title 31 Compliance. Additionally, the internal controls contain certain alternative procedures, some of which may or may not be implemented depending on applicable regulatory requirements in connection with the final promulgation of applicable regulations. The alternatives are provided in the interest of thoroughness and provide for Montreign's recommendations.