



Submit as Exhibit X.A.3. a description of the initial and ongoing training that will be used to help Gaming Facility employees identify those who may have gambling-related problems, or self-identify, and assist them to obtain help for those problems.

As set forth in the CPG Plan,¹ MRMI utilizes, and Montreign Operating Company, LLC will utilize, initial and ongoing training to help employees identify those who may have gambling-related problems, or self-identify, and assist them to obtain help for those problems. However, problem gambling is a hidden addiction and unlike drug and alcohol addiction, problem gambling has few outward signs. The outward signs that may be exhibited by a patron, which include signs of distress, could be related to other issues that are unrelated to a gambling problem. Therefore, no employee is qualified, or will attempt, to diagnose or identify a gambling problem.

MRMI educates, and Montreign 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 are, and will, be trained in accordance with the employee training program developed by the New York Council on Problem Gambling (“NYCPG”) and available at <http://nyrghub.org>. All employees, as



¹ See Attachment X.A.1.-1.

specified in the CPG Plan, are also trained in the Training for Intervention Procedures (“TIPS”). Employees of specific departments are trained in departmental specific training regarding policies and procedures as set forth in the CPG Plan. The training program includes training regarding:

- Characteristics and symptoms of disassociated behavior, including compulsive and problem gambling.
- The relationship of compulsive and problem gambling to other addictive behavior.
- The social and economic consequences of compulsive and problem gambling, including debt, treatment costs, suicide, criminal behavior, unemployment and family counseling.
- Techniques to be used when compulsive and problem gambling is suspected.
- Techniques to be used to discuss compulsive and problem gambling with patrons and advise patrons regarding community, public and private treatment services.
- Procedures designed to prevent serving alcohol to visibly intoxicated patrons.
- Procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
- Procedures for the dissemination of written materials to patrons explaining the self-exclusion program.
- 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.
- 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 placing the person on the excluded person or self-exclusion list (or within 5 business days after receiving notice from the Commission that the person has been placed on the excluded person or self-exclusion list).
- Procedures for preventing an individual under 21 years of age (18 years of age for VGM gaming, traditional lottery and wagering on races) from receiving any advertisement, promotion or other targeted mailing.

PROBLEM GAMBLING

HOW TO SPOT THE SIGNS

Would you know a gambling problem if you saw it in a friend, loved one, coworker, patient or student? It's important to know the signs because 3 percent of the population may have a problem, which puts them and their families at financial and emotional risk. Here are some warning signs:

- Preoccupied with gambling and unable to stop
- Bragging about gambling, exaggerating wins and minimizing losses
- Restless and irritable when not gambling
- Gambling to win back what you've lost
- Borrowing money for gambling
- Lying to hide time spent gambling or unpaid debts
- Frequent unexplained absences
- Losing work time because of gambling
- Doing something illegal to get money for gambling
- Jeopardizing a significant relationship or job by gambling



- Procedures to prevent an excluded person, an individual under 21 years of age (18 years of age for VGM gaming, traditional lottery and wagering on races) or a person on the self-exclusion list from having access to or from receiving complimentary services, or other like benefits.
- Procedures to prevent an excluded person, an individual under 21 years of age (18 years of age for VGM gaming, traditional lottery and wagering on races) or a person on the self-exclusion list from cashing checks.

During orientation, all new employees receive responsible gaming training. Employees with duties specified in the CPG Plan are, and will be, trained on the CPG Plan with a 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 are, and will be, given reinforcement training with a 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.