

## Exhibit X.B.4

### EXPERIENCE WITH HIRING UNEMPLOYED

*(Amended per NYSGFLB Memo Dated May 12, 2014)*

*The Gaming Facility Location Board recognizes the benefits to business and the economy of utilizing the skills of the long-term unemployed. A commitment to the removal of barriers that may prevent qualified long-term unemployed job seekers from applying or being fully considered for jobs generally requires the following practices:*

- 1. Ensuring that advertising does not discourage or discriminate against unemployed individuals.*
- 2. Reviewing screens or procedures used in recruiting and hiring processes so as to not intentionally or inadvertently disadvantage individuals from being considered for a job based solely on their unemployment status.*
- 3. Reviewing current recruiting practices to encourage all qualified candidates to consider applying, including the long-term unemployed, by taking steps that may include:
  - 1. Publicizing a commitment that qualified unemployed individuals will not be disadvantaged solely on their unemployment status on the Applicant's website, in application materials, or in other places where it can be seen by potential applicants;*
  - 2. Interviewing or otherwise considering qualified long-term unemployed individuals;**
- 4. Training hiring teams and recruiters to focus on the bona fide occupational requirements and leadership requirements for a given role and not on an applicant's current or recent employment status; and*
- 5. Engaging local and regional entities in order to reach broad segments of the population with relevant skills and experience.*

*(continued)*

*Submit as Exhibit X. B.4. a description of the Applicant's and, as applicable, the Manager's approach and experience in the last ten (10) years with hiring in general, and with particular respect to demographic groups evidencing high unemployment. Also include a structured plan or approach for the recruitment and hiring of the unemployed and long-term underemployed.*

**EXPERIENCE WITH HIRING UNEMPLOYED****Applicant and Manager Approach**

Pursuant to the terms of the Community Mitigation Plan between Nevele Resort, Casino & Spa and the Town of Wawarsing and the Village of Ellenville (collectively and with Ulster County, “Host Communities”), we have agreed to give reasonable preference to properly qualified residents of the Host Communities and to make every effort to afford the Host Communities’ residents the opportunity to be trained for such trade/craft positions through all training opportunities offered by us.

In addition, unlike other potential operators, Nevele does not have another operating property; as such, we have been working tirelessly with the State University of New York (SUNY), the Board of Cooperative Educational Services (BOCES) and the Workforce Investment Boards (WIB) partners to identify training and educational programs that can prepare Host Communities’ residents for jobs at Nevele Resort, Casino & Spa. We intend to assist and utilize all available local resources to develop a trained workforce for its operations, to focus its hiring efforts within the Host Communities, and to develop a robust in-house program to train its employees to meet our high standards.

In order to fulfill its commitments to its Host Communities, Nevele will actively seek partners to ensure that Host Communities’ residents, particularly those who are underemployed or unemployed, are provided sufficient training to enable them to obtain positions that we have allocated for them. This is in furtherance to our commitments of the Community Mitigation Plan and our Workforce Development Plan, both of which are part of this application.

Specific to the unemployed within the Host Communities, Nevele commits to working with the WIB to identify and communicate all jobs for which no special skills or experience are required and for which we will provide on-the-job-training. Additionally, in collaboration with the WIB, we have agreed to make presentations to the unemployed to explain the types of jobs that are available, what it’s like to work in a 24/7 casino industry environment and what to expect as an employee of Nevele.

Nevele Resort, Casino & Spa will also develop recruitment programs to link our job openings not only with the WIB, but also with numerous diversity partners serving underemployed persons, handicapped persons and veterans. Through the development of thousands of new jobs, training and recruiting, we are confident that we will have a significant positive impact on the high unemployment and underemployment in the region.

As its management has done for over 15 years in other jurisdictions, Nevele Resort, Casino & Spa will strive to create a diverse workforce and hire from areas characterized by high unemployment or underemployment. With recruiting and hiring in other jurisdictions, our management has been successful in training and facilitating training for casino jobs where there was no casino industry talent pool from which to recruit.

A recent example was in the State of Pennsylvania, which experienced a similar casino industry evolution as New York. In Pennsylvania, there was no talent pool of casino-experienced workers, however there was a huge talent pool from which to recruit in Atlantic City, New Jersey. As an example of Nevele management's recruiting and hiring experience and commitment to host communities, rather than recruit experienced dealers from Atlantic City, Nevele management working in PA at the time, opted to train over 90% of the dealing staff, who were residents of the Host Communities and the State of Pennsylvania, keeping over 500 jobs in PA. We commit to staying with the intent of the legislation that enacted the New York State Gaming Economic Development Act of 2013 by recruiting locally and hiring locally qualified job seekers into as many jobs as possible.

### **Best Practices for Hiring the Unemployed and the Long-Term Unemployed**

Nevele Resort, Casino & Spa realizes that there are people that have been out of work for long and longer periods – many times, through no fault of their own. We also realize that many of these people are ready, willing and able to work, regardless of how long they've been out of work. In fact, they are likely more eager to get back into the workforce. We are prepared to take applications from the unemployed and to interview all who are qualified, regardless of the length of unemployment.

To ensure that Nevele's employment advertising does not discourage or discriminate against unemployed individuals, we will not include verbiage in our ads that say we are only accepting applications for the employed or recently unemployed. We will ensure that our application questions, our screeners, our recruiters and our interviewers are focused on the quality and qualifications of the applicants. We will achieve this by training those employees responsible for the various hiring activities, by ensuring our advertising doesn't discriminate in any way, including against the unemployed, by posting Best Hiring Practices on our website and by sharing our Best Hiring Practices with our recruitment and training partners in the community.

**Structured Approach to Hiring the Unemployed and the Long-Term Unemployed**

Nevele will include the following approach to ensure we are not discriminating against the unemployed and the long-term unemployed and ensure that we are giving equal opportunity to the unemployed and the long-term unemployed by:

- Marketing jobs and career pathways to all irrespective of length of unemployment.
- Ensuring Best Hiring Practices are in place and complied with by all employees who play a role in the hiring process. This includes screeners, recruiters, interviewers and hiring managers.
- Advertising in a fair and equitable manner, in accordance with all laws and in compliance with our Best Hiring Practices, which includes not discriminating against the unemployed.
- Placing ads and posting jobs in places where the unemployed are more likely to see the ads/posting such as unemployment offices.
- Partnering with job placement assistance, work-based training and employer engagement programs.
- Placing a focus on reemploying long-term unemployed workers and working on getting them back to work through the use of skill assessments, job placement assistance, training and mentoring.
- Providing work-based and on-the-job training.

**Notes**

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