

IDENTIFICATION OF PROBLEM GAMBLING

EXHIBIT X. A.3

Staff Training Responsible Gambling

Resorts World Hudson Valley will educate all employees regarding 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. Resorts World Hudson Valley will focus on three training deliverables: the Training for Intervention Procedures (T.I.P.S.) Program; New York Council on Problem Gambling responsible gambling training; and in-house policy and procedure training for voluntary and involuntary exclusions, underage gambling, and intoxicated persons. Employees from all departments will be trained in departmental-specific training regarding the policies and procedures of responsible gambling.

The Human Resources Department will be responsible for creating and conducting respective departmental trainings including procedures set forth in the Resorts World Hudson Valley's Problem Gambling Plan. The problem gambling training program will include training and procedures regarding:

1. Procedures on how to handle persons who are displaying signs of problem gambling.
2. Procedures designed to prevent service of alcohol to visibly intoxicated gaming patrons.
3. Procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
4. Procedures for the dissemination of written materials to patrons explaining the self-exclusion program.
5. Procedures for removing an excluded person, an underage individual, or a person on the self-exclusion list from our facility including, if necessary, procedures that involve obtaining the assistance of appropriate law enforcement personnel.
6. 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 five business days after receiving notice that the person has been placed on the excluded person or self-exclusion list.
7. Procedures for preventing an individual under 18 years of age from receiving any advertisement, promotion, or other target mailing.
8. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from having access to or from receiving complimentary services or other like benefits.
9. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from cashing checks.
10. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from being issued a Resorts World Hudson Valley Player's Card.

Prior to beginning their assigned duties, all new employees will spend two hours in classroom lecture solely and specifically dedicated to the issues of problem gambling, the prohibition of underage gambling (Underage Gambling Policies and Procedure as shown in Appendix X. A.3-1.), 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 solely and specifically dedicated to the issues of 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.

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All employees from Security, Surveillance, Valet, Table Games, Hotel Operations, Food and Beverage, Slot Operations, EVS, Credit, and Finance will be trained in accordance with our Problem Gaming Plan above. Additional training and certification will be required for our on-property Responsible Gaming Ambassadors. Training will be conducted and certified through the New York Council on Problem Gambling. Training will include:

1. Characteristics and symptoms of compulsive behavior including problem gambling.
2. The relationship of problem gambling to other addictive behavior.
3. The social and economic consequences of problem gambling including debt, treatment costs, suicide, criminal behavior, unemployment, and family counseling.
4. Techniques to be used when problem gambling is suspected or identified.
5. Techniques to be used to discuss problem gambling with patrons and advise patrons regarding community and public/private treatment services.

WORKFORCE ENHANCEMENT FACTORS

APPENDIX X. A.3-1. Underage Gambling Policies and Procedures

Underage Gambling Policies and Procedures

Resorts World Casino New York City prohibits underage gambling and focuses efforts on preventing minors from accessing the casino floor.

- The RWCNYC Underage Gambling policy and the “Under 30 Initiative” were created to safeguard minors from being exposed to gambling activities.
- RWCNYC prohibits anyone under the age of 18 (eighteen) to enter the facility.
- Clear policies and procedures on underage gambling (identifying and removing violators) are in place to safeguard the integrity of the operation.
- Signage is conspicuously placed throughout the property informing the public that persons under the age of 18 (eighteen) are prohibited from entering the facility. Signs are placed in the Food Court, each Parking Level, Elevators, Bus Lobby, Family Corridor, Porte -Cochere and all other entry points.
- Underage disclaimer plaques are placed on each gaming machine enforcing the underage gambling policy.
- Security Officers are placed at each point of entry to screen all guests coming in.
- Stanchions are positioned at points of entry to control access to the Casino Floor. Security Officers can clearly monitor the flow of traffic through these control access points while ensuring RWCNYC remains in compliance with the age mandate.
- RWCNYC has an “Under 30 Initiative” in place in which employees are required to ID anyone who looks like they may be under the age of 30. The “Under 30 Initiative” pertains to entering the casino and also serving alcohol.
- All newly hired employees undergo Responsible Gambling training, which incorporates the Underage Gambling procedure and the “Under 30 Initiative”.
- Security personnel are continuously trained on how to recognize underage gambling. Refreshers are done on a yearly basis through classroom training as well as pre-shift meetings.
- The RWCNYC website clearly states the company policy prohibiting anyone under the age of 18 (eighteen) from entering the facility and also provides resources for Responsible Gambling.
- Palm cards and brochures about underage gambling are available to guests at the RGSC, the Security Podiums and at the Genting Rewards information desk.

- An accurate list is maintained with the names of all persons who are found to be in violation of the underage policy.

The procedures for Underage Gambling are as follows:

1. Entering the Facility
 - a. Security Officers are present at each point of entry into the facility. The security post is stanchioned off to control the entering and exiting of patrons.
 - b. Security Officers are trained to verify the age of all patrons that look under the age of 30. The following forms of identification are acceptable and must be produced before gaining entrance:
 - i. A photographic driver's license issued by the laws of a state or other government agency which appears on its face to be valid.
 - ii. A photographic identification card or similar card issued pursuant to the laws of a state or federal government which appears on its face to be valid.
 - c. If a patron is suspected of being under the age of 30 refuses or cannot provide proper identification, the Security Department shall not permit that individual to enter the facility.
 - d. Requesting and checking identification of questionable individuals shall be the primary responsibility of Security Officers assigned to entrance of the facility. In addition, waitresses and bartenders must also verify age of patrons who look under the age of 30 to ensure that no one under the age of 21 is being served alcoholic beverages.
 - e. Any floor operations employee that is in constant contact with patrons is expected to adhere to procedures for underage gambling.
2. Detection and Enforcement
 - a. All employees have been trained on the company underage policy and should be able to identify questionable persons.
 - b. If any employee has a suspicion that someone under the age of 18 has gained access to the casino floor or any outlet on property, they are to immediately notify the Security Department via radio with the location of the questionable person.
 - c. A Security Officer will go to the requested location and ask the patron to provide proper identification.
 - d. Security will be in communication with Surveillance.
 - e. If the person in question is found to be underage and is either unwilling or unable to produce identification verifying age, the Security Officer will escort the patron to the Security Department where information about the patron will be collected and maintained on a log. Local authorities will be notified and underage persons will be escorted off the property.