HISTORICAL EFFORTS AGAINST PROBLEM GAMBLING

EXHIBIT X. A.6

Historical Efforts Against Problem Gambling

Resorts World Hudson Valley will continue to focus its efforts on employee readiness, dissemination of information, and patron support services. Continuing to pace the industry with respect to problem gambling training, dissemination of information, and use of facilities to facilitate our robust support service offerings will ensure that we exceed the standard of our own current practices. Continuous training at all levels will support the foundation of our Responsible Gaming Plan (Appendix X. A.6-1) and help to cement our dedication to ensuring that Resorts World Hudson Valley proactively engages the community with a message of responsible gaming.

Our Code of Conduct will continue to represent our commitment to our customers, employees, and the state of New York concerning responsible gambling. All relevant Resorts World staff currently complete approved responsible gambling training through the New York Council on Problem Gambling (NYCPG). Resorts World Hudson Valley will be committed to training employees on an annual basis, as problem gambling information and criteria changes to ensure that customers can be provided with the most appropriate service(s) for their individual circumstances.

Responsible Gambling services currently available to customers at Resorts World include:

- A Responsible Gambling Support Center (RGSC) located in Guest Services, where patrons may discuss potential problem gaming issues;
- On-property Responsible Gambling Ambassadors (RGA);
- Self-exclusion;
- Information and assistance (also offered in languages other than English);
- Referral to other support providers and treatment centers;
- Self-assessment test to gauge risk level;
- On-property phone access to the Problem Gambling HOPEline;
- Brochures and palm cards (also offered in languages other than English).

All services are currently provided confidentially in our RGSC and are free of charge, 20 hours a day, 7 days a week.

Our current Code of Conduct and all processes and procedures related to our current and active Responsible Gaming Plan in Resorts World New York City are internally reviewed, at least annually, to ensure that it complies with relevant state and federal legislation and any other relevant guidelines. The content, operation, and effectiveness of the Code of Conduct and our operational procedures with respect to responsible gaming and training modules for the preceding 12 months will also be reviewed at this time.

Current plan review involves seeking feedback from all relevant stakeholders including Resorts World staff, customers, and problem gambling support services. The Resorts World Responsible Gambling Department obtains feedback through Gambling Related Incident Reports (GRIR) (Appendix X. A.6-2). RGAs collate and report on the data collected through GRIRs and when relevant, forward that report including recommendations for improvement of the Code of Conduct and/or its operation.

Within three months of the commencement of the relevant review, a meeting of the Resorts World Responsible Gambling Management Committee (RGMC) is held to consider and review the report, and where relevant, agree on recommendations for change and/or improvement. The RGMC will also make a plan for implementing accepted recommendations. All updates to our Responsible Gaming Plan and changes in policy or procedures are provided to the New York State Gaming Commission when completed. These current program auditing practices will be instituted at Resorts World Hudson Valley property to ensure that the Responsible Gaming Plan and the Code of Conduct continue to exceed the pace of standard market practices.

HISTORICAL EFFORTS AGAINST PROBLEM GAMBLING

It is also important to note that all current policies and procedures with respect to our Responsib	le
Gaming Plan will be updated to include Credit Services, Table Game Operations, and Hotel Operations.	

WORKFORCE ENHANCEMENT FACTORS

APPENDIX X. A.6-1. Responsible Gaming Plan



PROBLEM GAMBLING PLAN

May 2014



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Goals of Resorts World New York City Problem Gambling Plan and Procedures

Resorts World Casino New York City has developed, and will maintain, amend and adjust as necessary, the goals, procedures and timetables of this RWCNYC Problem Gambling Plan as outlined below. The procedures set forth in this RWCNYC Problem Gambling Plan and the designated employees will follow its attachments. The RWCNYC Problem Gambling Plan will be implemented on or before the opening of the casino.

All employees of Resorts World Casino New York City are expected to be knowledgeable of, and follow approved procedures consistent with, this RWCNYC Problem Gambling 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 RWCNYC Problem Gambling Plan as well as training on the RWCNYC Problem Gambling Plan itself.

Resorts World Casino New York City will:

- 1. Educate all employees on responsible gaming.
- 2. Educate all employees on how to recognize signs of problem gambling.
- 3. Educate all employees on the social and economic costs of problem gambling.
- 4. Educate all employees regarding the relationship between problem gambling and other addictive behaviors.
- 5. Educate all employees on where to locate and how to provide problem gambling literature to patrons seeking such information.
- 6. Educate all employees on the process of reaching out to a patron suspected of 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 problem gambling, and where to find professional assistance and/or treatment.
- 8. Prevent underage gambling.
- 9. Prevent gambling by intoxicated patrons.
- 10. Conspicuously place signage bearing the toll-free helpline number for the Compulsive Gamblers hotline as specified in the section titled *Plans for posting signs* and as provided in Exhibit "A"
- 11. Serve alcoholic beverages responsibly.
- 12. Advertise responsibly and avoid using individuals who appear to be under 18 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. Mandate attendance at employee orientation and mandate attendance at annual reinforcement trainings regarding problem gambling.



- 15. 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 of New York Council on Problem Gambling which is attached hereto as Exhibit "B". Departmental specific training is conducted by Department Directors.
- 16. Ensure that no one under the age of 18 is issued a Genting Rewards Player's Card.
- 17. Ensure that no one issued a Genting Rewards Player's card is identified on the self-exclusion or exclusion lists maintained by RWCNYC.
- 18. Ensure that all persons read and sign the back of the Genting Rewards Player's Card upon issuance in order to confirm that they are over the age of 18 and not an individual whose name appears on the self-exclusion or exclusions lists maintained by RWCNYC.



Commitment to train employees and annual reinforcement training

Resorts World Casino New York City 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. All employees of Resorts World Casino New York City will be trained in accordance with the employee training program Exhibit "C". Security, Surveillance, Valet, Beverage, appropriate employees from the Restaurant Department, Slot Operations Supervisor, Slot Operations Manager, and Slot Technician Manager will be trained in the Training for Intervention Procedures (T.I.P.S.) Program Exhibit "K". Employees of the Food and Beverage and Marketing Departments will be trained in the procedures for issuing/activating Genting Rewards Player's Cards. 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 RWCNYC Problem Gambling Plan. The problem gambling training program includes training and procedures regarding:

- 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, 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 18 years of age from receiving any advertisement, promotion or other target mailing.
- 12. 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.
- 13. Procedures to prevent an excluded person, an individual under 18 years of age or a person on the self-exclusion list from cashing checks.



14. 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 Genting Rewards Player's Card.

Prior to beginning their assigned duties, all new employees will spend one hour and forty-five minutes in classroom lecture with sole and specific dedication 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.

All employees will spend one hour and twenty minutes annually in reinforcement training with sole and specific dedication 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.

All employees from – Security, Surveillance, Valet, Food and Beverage, appropriate employees from the Restaurant Department, Slot Operations Supervisor, Slot Operations Manager, and Slot Technician Manager will be trained in the T.I.P.S Program.

SECTION #3

The Problem Gambling Committee is responsible for the implementation and maintenance of the plan

The Problem Gambling Committee is charged with reviewing RWCNYC Problem Gambling Plan and ensuring its effective implementation during day-to-day operations of the facility. Problem Gambling Committee shall monitor, adjust, and respond to concerns involving the maintenance of the Problem Gambling Plan and ensure meaningful compliance therewith. Problem gambling issues and/or concerns will be recorded electronically in the responsible gaming log. The responsible gaming log will be kept electronically by the Director of Security or his designee in the Security Department.

The Problem Gambling Committee shall consist of the President & Chief Executive Officer, Chief Financial Officer, Vice President of Human Resources, Director of Security, Vice President Gaming Operations, Vice President of Surveillance, Casino Controller, Compliance Manager, Compliance Specialist and H.R. Training Manager. The Compliance Manager shall serve as liaison to RWCNYC with regard to issues related to the content and administration of RWCNYC Problem Gambling Plan.

The Problem Gambling Committee will meet quarterly. During these meetings the responsible gaming log will be reviewed. Agendas and minutes of these meetings will be submitted to the Director of RWCNYC Problem Gambling upon request, at least annually.



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 Resorts World Casino New York City are expected to be knowledgeable of, attend trainings and follow approved procedures consistent with, the RWCNYC Problem Gambling Plan. This includes reporting suspected or identified compulsive or problem gamblers to supervisory employee. Employees are required to keep the identity of an individual suspected of compulsive or problem gambling confidential.
- 2. The Problem Gambling Committee shall engage a 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. Currently, the Committee has engaged the New York Council on Problem Gambling ("NYCPG") to conduct the orientation and reinforcement.
- 3. The Problem Gambling Committee shall engage a person or business with specialized knowledge, skill, training and experience in responsible gaming to create, provide and/or review the problem gambling/responsible gaming literature to be provided to patrons. Currently the Committee has engaged the NYCPG to provide and/or review the literature/brochure content.
- 4. The Problem Gambling Committee will conduct routine and periodic reviews of self-exclusion/exclusion lists, the training program, literature/brochure content, availability and accessibility, and will create annual reports regarding the Plan.
- 5. Specific departments have duties and responsibilities as set forth below:
 - a. <u>Security Department</u>-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. Security is responsible for ensuring that persons entering the gaming floor have a valid identification. Procedures for the Security Department are set forth in this plan.
 - b. <u>Surveillance Department-</u>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 Vice President of Surveillance and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patron intoxication, patrons appearing under the age of 18 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. <u>Slots Department-</u>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 ambassadors 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. <u>Cashier's Cage-</u>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.
- e. <u>Marketing Department-</u>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 DRS (Dynamic Reporting System) system, and flagged, within 5 business days of Resorts World Casino New York City's receipt of the lists from RWCNYC. Marketing is responsible for ensuring that only individuals who are over the age of 18 and not identified as excluded or self-excluded persons are issued a Genting Rewards Player's Card. Procedures for Marketing are set forth in this plan.
- f. <u>Food and Beverage Department-</u>Food and Beverage is responsible for preventing the serving 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. Food and Beverage are responsible for ensuring that no individual under the age of 21 is served an alcoholic beverage. Procedures for Food and Beverage are set forth in this plan.
- g. <u>Valet Department-</u>Valet is responsible for preventing intoxicated patrons from obtaining a valet parked car to leave the facility.



The Responsibility of Patrons with Respect to Responsible Gambling

- 1. Resorts World Casino New York City utilizes a brochure, which provides patron responsibilities regarding responsible gambling. Attached as Exhibit "D" are brochures from the NYCPG which Resorts World Casino New York City will display at its licensed facility along with customized Resorts World Casino New York City brochures.
- 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.
 - 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.

SECTION #6

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

Resorts World Casino New York City educates all employees regarding signs, symptoms and procedures to be utilized to identify patrons and employees with suspected or known problem gambling behavior pursuant to the problem gambling plan training. See Exhibit "C". 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 problem gambling behavior may be difficult for non-mental health personnel. The inaccurate identification of problem gambling can lead to faulty assumptions, violations of privacy, or possibly the assignment of an inaccurate stigmatizing label by a non-professional.



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

Resorts World Casino New York City 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. See Exhibit "E".

- 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. RGA 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 should be then forwarded to a Responsible Gaming Ambassador (RGA) who will approach the patron in confidentiality. Upon request the RGA will offer support services to the problem gambler or escort the patron to the Responsible Gaming Support Center.

Resorts World Responsible Gaming Support Center (RGSC)

The RGSC is strategically located away from the gaming floor and it provides a unique array of services and resources for customers with potential gambling problems. Staffed with trained professionals this center is the focal point of Resorts World's commitment to providing support for troubled gamblers. Specifically the RGSC:

- a. Facilitates referrals to problem gambling, financial counseling support services and welfare organizations and provides contact(s) with and information about these bodies;
- b. Ensures assistance and referrals services are conducted in strict confidence;
- c. Provides information regarding Self-Exclusion for customers who wish to exclude themselves from the casino and helps to manage Resorts World's Self-Exclusion Program;
- d. Provides strategies to assist customers in managing their gambling behaviors, to foster responsible gambling and prevent difficulties from arising; and
- e. Provides all services free of charge, 20 hours a day, 7 days a week



- 3. Before reporting and escalating through the proper channels, 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 Responsible Gaming Ambassador for further assistance.
- 5. The Responsible Gaming Ambassador (RGA) will evaluate the facts and circumstances presented and make a determination if the patron should be approached. If an approach is warranted, the RGA 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 (Exhibits "D" and "H") as set forth in the next section titled *Procedures for providing information to individuals with suspected or known problem gambling behavior*. Always protect privacy of the patron.
- 6. If the person is not receptive, walk away.
- 7. The RGA will enter all known information regarding the incident into the electronic responsible gaming registry kept electronically by the Responsible Gaming Committee located within the RGSC.



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

Resorts World Casino New York City will make available to all patrons printed material to inform patrons about problem gambling, responsible gaming, the self-exclusion program and treatment options on the floor and in the Responsible Gaming Support Center.

- 1. Resorts World Casino New York City 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. Resorts World Casino New York City will provide items in display cases located at the Security Podium and Security Office, Player's Club Information Booth, each Cashier Cage and the Responsible Gaming Support Center. The other listed items will be kept at the Security Podium, Cage, Player's Club Information Booth and the RGSC will be provided to guests upon their request:
 - a. Responsible Gaming brochure (Display cases)
 - b. Problem Gambling brochure (Display cases)
 - c. Self-Exclusion Program Brochure (Display cases)
 - d. Request for Voluntary Self-Exclusion form (Upon request)
 - e. Treatment provider list (Upon request)
 - f. Gamblers Anonymous New York Directory (Upon request)
 - g. GAM-ANON New York Directory (Upon request)
 - h. Resorts World Code of Conduct
 - i. Underage Gambling brochures
- 3. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
- 4. The RGA 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, (Exhibit "I"), and on the backside of all ticket vouchers (Exhibit "J") which provides the phrase "PLAY RESPONSIBLY! CALL 1-877-8 HOPENY"



Procedures for responding to patron requests for information

Resorts World Casino New York City will provide or direct patrons to the location of printed material to inform patrons about problem gambling, responsible gaming, the self-exclusion program and treatment options. See Exhibit "D"

- 1. Resorts World Casino New York City will provide item attached hereto as Exhibit "D" which are customized for Resorts World Casino New York City in display cases located at Casino Security Podium and Security Office, Player's Club Information Booth, The Responsible Gaming Support Center and Cashier Cage. The other listed items Security Podium, Cage, Responsible Gaming Support Center and the Player's Club Information Booth will be provided to guests upon their request:
 - a. Responsible Gaming brochure (Display cases)
 - b. Problem Gambling brochure (Display cases)
 - c. Self-Exclusion Program Brochure (Display cases)
 - d. Request for Voluntary Self-Exclusion form (Upon request)
 - e. Treatment provider list (Upon request)
 - f. Gamblers Anonymous New York Directory (Upon request)
 - g. GAM-ANON New York Directory (Upon request)
 - h. Resorts World Code of Conduct
 - i. Underage Gambling brochures
- 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, (Exhibit "I"), and on the backside of all ticket vouchers (Exhibit "J"), which provides the phrase "PLAY RESPONSIBLY! CALL 1-877-8 HOPENY"
- 4. Requests for information should never be entered into the player tracking system.



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 (RGA) or other supervisory employee* and the section titled *Procedures for providing information to individuals with suspected or known 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, RGA, security and if necessary, the Manager on duty, however the identity should never be discussed or disclosed to any other employee of Resorts World Casino New York City or individual who is not one of the designated employees unless directed to do so by any of the above referenced individuals or a RWCNYC employee.



Procedures for Voluntary Self-Exclusion Procedures

Resorts World Casino New York City has created and implemented a Self-Exclusion Program in which guests can voluntarily ban themselves from coming on property and using the gaming facility.

- The Self-Exclusion Program was created to safeguard individuals who exhibit or are at risk of problem gambling.
- A self-exclusion bans the patron from utilizing gaming machines, food outlets, entertainment and events. Once self-excluded, the patron is banned from coming on RWCNYC property for any reason.
- The Self-Exclusion Program is well advertised onsite at the gaming facility and is explained through informational palm cards or other take away materials as well as on the company website where paperwork for Voluntary Self Exclusion can be downloaded.
- Clear self-exclusion policies and procedures are written to process a self-exclusion.
- Trained RGSC staff is available to assist 20 hours a day, 7 days a week to facilitate exclusions. RGSC staff can clearly, respectfully and tactfully explain the self-exclusion process, options and breaches of the exclusion.
- Responsible Gaming Support Center (RGSC) will be utilized to complete the self-exclusion process.
- A player tracking system is utilized to remove self-excluded patrons from mailing lists as well as to monitor any access/use of a reward card after self-exclusion has been requested.
- A separate system is used to flag the social security numbers of self-excluded guests. Any self-excluded guest who wins a reportable amount will be automatically identified once trying to redeem that voucher at any Cashier's Cage.
- Self-Exclusion lists are consistently monitored and updated to reflect additions and expired self-exclusions.
- Updated self-exclusion lists are regularly sent to relevant departments whose main job and function is so to facilitate and maintain integrity of the Self-Exclusion Program (Surveillance, Marketing, Finance, etc).



- Self-excluded patrons are provided resources on problem gambling in the form of palm cards and brochures.
- Self-excluded patrons are required to wait until their entire exclusion period has expired before they can return to the facility.
- Self-excluded patrons stop receiving promotional materials as soon as possible following the time of the exclusion.
- A detection and enforcement procedure is in place to identify and remove self-excluded patrons.
- Once the exclusion period has expired, the self-excluded person is not automatically removed from the exclusion list. The patron must make a formal request before being removed.
- A Self-Exclusion Committee compromised of Executive Level staff reviews requests for reinstatement and makes a decision based on a case-by-case basis.
- The reinstatement process requires the individual complete an education program on Problem Gambling and provide proof of completion with their request letter for reinstatement.
- Additionally, a mandatory meeting will be held at the end of exclusion period which will
 include an evaluation of the self-excluders gambling situation, information about chance
 and Responsible Gambling, and referrals to additional resources if needed. The selfexclusion period will continue if the mandatory meeting is not attended.

The procedure for the Self-Exclusion is as follows:

- 1. Request for Self Exclusion in Person
 - a. Request for Self Exclusion can be submitted by appearing in person at the RWCNYC Command Center.
 - b. Person requesting Self Exclusion must complete and submit a Voluntary Self Exclusion Form (Exhibit A), a signed release and present proper identification.
 - i. ID must valid, contain the person's signature and photograph.
 - ii. Verification of identity must be confirmed by an authorized RWCNYC employee (RGA, Security Officer). Employee will sign and record their gaming license number as well as a physical description or photograph (that agrees with the physical description of the person's actual appearance) of the person requesting exclusion on the Voluntary Exclusion Form.
 - c. All information as follows appears on the Voluntary Exclusion Form and must be completed to its entirety by the person requesting Self Exclusion and the RWCNYC employee facilitating the process:



- i. Date of requested Self Exclusion
- ii. Name
- iii. Address
- iv. Current Phone Number
- v. Date of Birth
- vi. Social Security Number (voluntary)
- vii. A photograph that complies with passport or drivers license standards
- viii. Genting Rewards account number if applicable
- ix. Length of requested Self Exclusion period
 - 1. The time period must be one of the following designated time frames:
 - a. One year
 - b. Three years
 - c. Five years
 - 2. Once the time frame is selected, the person requesting exclusion must serve the entire duration of the exclusion period
- x. Signed Release, acknowledging the following statement:
 - a. "I certify that the information which I have provided is true and accurate. I am aware that my signature below authorizes RWCNYC to enforce my exclusion until the expiration of the exclusionary period I have requested. I understand that if found within the RWCNYC facility after having been voluntarily excluded, I will be subject to arrest for criminal trespass. Furthermore, I authorize RWCNYC to send a copy of my request to each video lottery gaming facility located within New York State."
- d. A copy of the Voluntary Self-Exclusion Form is given to the person requesting exclusion.
- 2. Request for Self Exclusion by Mail
 - a. Request for Self Exclusion can be submitted by mail addressed to the following:
 - a. Resorts World Casino New York City
 - b. Tim Pearson Director of Security
 - c. 110-00 Rockaway Boulevard
 - d. South Ozone Park, NY 11420
 - b. Person requesting Self Exclusion by mail must complete and submit a Voluntary Self Exclusion Form (Exhibit A), a signed release and proper identification.
 - i. ID must valid, contain the person's signature and photograph.
 - ii. Request for self exclusion done by mail shall be signed before a Notary Public or other person empowered by law to take oaths and shall contain a certificate of acknowledgement by such notary public or other person attesting to the identity of the person making the request.
 - c. All information as follows appears on the Voluntary Exclusion Form and must be completed to its entirety by the person requesting Self Exclusion and the Notary Public or other person empowered by law to take oaths:
 - i. Date of requested Self Exclusion
 - ii. Name



- iii. Address
- iv. Current Phone Number
- v. Date of Birth
- vi. Social Security Number (voluntary)
- vii. A photograph that complies with passport or drivers license standards
- viii. Genting Rewards account number if applicable
- ix. Length of requested Self Exclusion period
 - 1. The time period must be one of the following designated time frames:
 - a. One year
 - b. Three years
 - c. Five years
 - 2. Once the time frame is selected, the person requesting exclusion must serve the entire duration of the exclusion period
- x. Signature and Seal by Notary Public
- xi. Signed Release, acknowledging the following statement:
 - a. "I certify that the information which I have provided is true and accurate. I am aware that my signature below authorizes RWCNYC to enforce my exclusion until the expiration of the exclusionary period I have requested. I understand that if found within the RWCNYC facility after having been voluntarily excluded, I will be subject to arrest for criminal trespass. Furthermore, I authorize RWCNYC to send a copy of my request to each video lottery gaming facility located within New York State."
- 3. Processing and Maintaining Self Exclusion List
 - a. RWCNYC or an appointed RGA will create and maintain an accurate list of all past and present Self Exclusions which will include the following information (Exhibit B):
 - i. Date of Self Exclusion
 - ii. Name
 - iii. Address
 - iv. Phone Number
 - v. Date of Birth
 - vi. SSN (optional)
 - vii. Length of Exclusion
 - viii. Reason ("Voluntary Self Exclusion")
 - ix. Reinstatement Date
 - b. RWCNYC Security Department will create a file for any requested exclusion pursuant to section 5.117.6 which will be comprised of the following:
 - i. A copy of the completed Voluntary Self-Exclusion Form
 - ii. The date, time, signature and employee license number of the authorized representative creating and processing the file
 - c. Security will notify Surveillance, Marketing and Finance Departments of all additions to the self exclusion list within one business day as well as expirees on the self exclusion list.



- i. Marketing Marketing will immediately remove the self-excluded person from the rewards program and stop any promotional advertisements from being mailed to the self-excluded.
- ii. Finance Finance will flag the social security number of the self-excluded person.
- iii. Surveillance Surveillance will periodically review photos and will be able to identify self-excluded persons as part of their job responsibility.
- d. RWCNYC will not divulge any name on the Master Self-Exclusion List other than to authorized RWCNYC employees whose duties and functions require access to such information and the New York Gaming Commission or the commission's duly authorized representatives.

4. Detection and Enforcement

- a. The following indicators will immediately detect if a self-excluded person violates their exclusion:
 - i. Once a Genting Rewards card of a self-excluded person is inserted into a video gaming machine or in a promotional kiosk an alert will be sent
 - ii. If a self-excluded person presents their Genting Reward Card to a representative at any Genting Rewards booth an alert will be sent
 - iii. If a self-excluded person attempts to redeem a Limited Voucher at any Cashiers Cage, an alert will automatically notify Cage Personnel.
- b. Surveillance and Security will periodically review photos and will be able to identify potential self-excluders as part of their job responsibilities.
- c. RGA's will periodically review photos and will be able to identify potential self-excluders as part of their job responsibilities.
- d. If a self-excluded person is identified on property, the following protocol is to be adhered to:
 - i. Security is to be called immediately at X3333 with the location of the self-excluded person
 - ii. Surveillance is to be called immediately at X3080 with the location of selfexcluded person
 - iii. Security (or RGA) will immediately make their way to the location provided
 - iv. Security (or RGA) will respectfully and tactfully approach the self-excluded person and ask them to accompany them to the RGSC.
 - v. The authorized employee will communicate clearly to the self-excluded person that they have violated their exclusion and must immediately leave the property.
 - vi. If the self-excluded person refuses to be escorted from the property, a law enforcement agency shall be immediately notified and requested to effectuate an arrest of the self-excluded person for criminal trespass. Authorized employees of RWCNYC shall be empowered to swear the complaint against the excluded person.



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

Resorts World Casino New York City will provide or direct patrons to the location of printed material to inform patrons about problem gambling, responsible gaming, the self-exclusion program and treatment options (Exhibit "D", "E" and "H") and will review and update the printed materials as necessary.

- 1. Resorts World Casino New York City will post signage as set forth in the section titled *Plans for posting signs* and as provided in Exhibit "A".
- 2. Resorts World Casino New York City will provide printed information (Exhibit "D") in display cases located at Casino Security Podium and Security Office, Player's Club Information Booth, each Cashier Cage and the Responsible Gaming Support Center.
- 3. On the backside of all Player Cards, (Exhibit "I") and on the backside of all ticket vouchers (Exhibit "J"), on the Web site, and on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio and television, Resorts World Casino New York City will print and/or provide the phrase "PLAY RESPONSIBLY! CALL 1-877-8 HOPENY"

SECTION #13

List of community, public and private treatment services

Resorts World Casino New York City will provide or direct patrons to the location of printed material to inform patrons about treatment options (Exhibit "H") and will review and update the printed materials as necessary. Providing this list *does not* create a duty for Resorts World Casino New York City or its employees to refer problem gamblers to qualified treatment professionals.

- 1. Resorts World Casino New York City 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 problem gambling behavior*, the section titled *Provision of printed material to educate patrons about problem gambling and to inform them about treatment services available* and upon request.
- 2. Resorts World Casino New York City will provide such information located at Casino Security Podium and Security Office, Player's Club Information Booth, each Cashier Cage and the Responsible Gaming Support Center, upon patron request.



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

Resorts World Casino New York City 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. All employees of Resorts World Casino New York City will be trained in accordance with the employee training program Exhibit "C". Appropriate employees, as specified herein, will be also be trained in the T.I.P.S. Program. 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 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. See Exhibit "F". This record of training attendance will be kept on file in the Human Resources Department.
- 2. Verification of T.I.P.S training will be demonstrated pursuant to the T.I.P.S 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 gambling, will include the employee's printed name and employee signature below the following phrase; "This certificate of successful completion of problem gambling awareness training for Resorts World Casino New York City is hereby granted to".
- 5. Additionally, the signature of the Resorts World Casino New York City's President, and the date of the training will be affixed to the certificate. Exhibit "G". The certificate of training completion will be awarded after verification of "sign-in," "sign-out" procedures and be kept in the employees personnel file.



Procedures to prevent underage gambling

Persons under the age of twenty-one (18) ("underage") are prohibited from gambling, or from entering Resorts World Casino New York City's gaming floor.

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. Resorts World Casino New York City 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* and as provided in Exhibit "A".
- 2. Prior to entering the gaming floor, all patrons who appear under the age of 30, as set forth in our Under "30" Initiative, training materials Exhibit "M", 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 Department of Motor Vehicles or any other state.
 - b. A valid Alcohol Beverage Control Card.
 - c. A valid photo identification issued by the New York Department of Motor Vehicles 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. 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 personnel who will enact the security procedures related to underage gambling as set forth in the Security Department duties and responsibilities below.
- 5. Specific departments have duties and responsibilities as set forth below:
 - a. <u>Security Department</u>-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, as set forth in our Under "30" Initiative, training materials Exhibit "K", 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, as set forth in our Under "30" Initiative, training materials Exhibit "K", 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 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 supervisor/manager will immediately contact the Casino Compliance Representative on duty, New York Police Department (NYPD) and surveillance. The underage individual will be escorted off the gaming floor by the security officer(s) and/or NYPD 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 from RWCNYC and/or NYPD 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 RWCNYC upon request.
- 5) The Director of Security/Manager or Supervisor 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 Manager 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 Chief Financial Officer 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 New York Gaming Commission within 24 hours of the identification of an underage individual who has engaged in gaming activities.
- 7) Security Guards will require any patron appearing under the age of 30 as set forth in our Under "30" Initiative, training materials Exhibit "K" to also produce a valid Genting Rewards Player's Card which will be verified in the manner described below.



- b. <u>Surveillance Department-</u> 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 Vice President 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 Manager 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 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 Manager 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.
 - 4) Surveillance will monitor the casino entrances to ensure that all patrons swipe a valid Genting Rewards Player's Card prior to entering the gaming floor.
- c. <u>Slots Department-</u> Slot ambassadors are responsible for the visual monitoring of patron activity on the gaming floor. Slot ambassadors 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 18 years of age.
 - 1) If any slot ambassadors 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 ambassadors will immediately notify Security personnel, who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Director of Security /Security Shift Manager will document the incident and notification efforts on an incident report.
- d. <u>Cashier's Cage-</u>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) Cashier/Cage personnel 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 Lottery Commission (NYGC) requests remittance.
- 4) The Director of Security/Security Shift Manager will document the incident and notification efforts of the Cage on an incident report.
- e. <u>Marketing Department-</u> Marketing personnel require legally acceptable government issued photo identification prior to registering an individual in the player tracking system and issuing a Player's Club Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested with proof of residence, but, but both addresses will be listed in the system. A Player's Club Card will not be issued to an individual under 18. Only Player's Club members will be eligible for promotions, complimentary services, awards and drawings and targeted mailings.
 - 1) At the time of Player's Club 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 Player's Club card number and PIN number are integrated into the player tracking system, no self-redemption or use of the points on the Player's Card can occur without the use of a valid card and the PIN number.
 - 2) In addition, individuals under the age of 18 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 Player's 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 showing proof of age.
 - 4) Upon identification, or notification of an individual suspected to be under 18, marketing personnel will immediately notify the Marketing Manager, who will notify Security personnel who will enact the security procedures related to underage gambling as set forth above.
 - 5) The Director of Security/Security Shift Manager will document the incident and notification efforts on an incident report.
- f. <u>Food and Beverage Department-</u>Although security officers will be asking anyone who appears to be 30 years or age or under, as set forth in the T.I.P.S. training materials Exhibit "K", 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 Food and Beverage Manager if a patron appears to be under 18 years of age (as set forth in the T.I.P.S. training materials Exhibit "K") and is on the gaming floor or consuming or attempting to consume alcohol. The Food and Beverage Manager 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 Manager will document the incident and notification efforts on an incident report.



Procedures to prevent excluded persons from gambling

Resorts World Casino New York City prohibits excluded persons from gambling.

- 1. Resorts World Casino New York City shall maintain electronic and hard copies of the most current version of the Exclusion List published by RWCNYC 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 acknowledged by the Director of Security or his designee to the Casino Compliance Representative.
 - b. The Director of Security or his designee within 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, and Operational Accounting Department. The Director of the Security and the Vice President of Surveillance are responsible for ensuring all employees of their 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. Directors of the other departments listed above are responsible for ensuring all managers and supervisors and above of their departments review the information and photographs of 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 the Security and Surveillance Departments 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 RWCNYC and placed on the list, will have their names and brief physical descriptions entered on the player tracking system by the Database Marketing Manager within 5 business days after the day notice is mailed or transmitted electronically to Resorts World Casino New York City. If no player tracking system account exists for an individual on the exclusion list, the Database Marketing 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 Resorts World Casino New York City. 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 Resorts World Casino New York City 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 Self-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.
- 5. The CFO shall inform the New York Lottery Commission, in writing, of the names of persons that Resorts World Casino New York City believes are appropriate for placement on the self-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 of New York 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 of New York 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 of New York 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 of New York 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 of New York 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 of New York 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 of New York 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.
 - 5. 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 RWCNYC 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 RWCNYC 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 RWCNYC 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. The Director of Security will forward a copy of the report to the President and CEO.
 - 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 New York Gaming Commission via email within 24 hours of the incident and will copy Compliance Specialist.
- b. <u>Surveillance Department-</u> 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 Vice President 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 self-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. <u>Slots Department-</u>All slot ambassadors 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. Designated Slots Department personnel will review the exclusion list on a weekly basis. Slot ambassadors 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 ambassadors 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 ambassadors will immediately notify the Security personnel who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Director of Security/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- d. <u>Cashier's Cage-</u> 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 Cage Manager.
 - 2) The Cage Manager will notify Security personnel who will enact the security procedures related to excluded persons as set forth above.
 - 3) Cashier/Cage personnel 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 RWCNYC requests remittance.
 - 4) Director of Security/Security Shift Supervisor will document the incident and notification efforts of the Cage on an incident report.



- e. <u>Marketing Department-</u> Excluded persons, who have been identified by RWCNYC and placed on the list, will have their names and brief physical descriptions entered on the player tracking system by the Database Marketing Manager within 5 business days after the day notice is mailed or transmitted electronically to Resorts World Casino New York City. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Resorts World Casino New York City 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 Player's Club Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested with proof of residence, but both addresses shall remain in the system.
 - 2) A Player's Club Card will not be issued to an individual who is flagged in the player tracking system as being excluded.
 - 3) Only valid Player's 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) Marketing personnel require legally acceptable government issued photo identification prior to issuing a Genting Rewards Player's Card. The government issued photo identification will be scanned into the Casino Access System.
 - 5) Casino Access and Genting Rewards Player's Cards will not be issued to an individual who is flagged in the Casino Access System as being excluded.
 - 6) Upon identification, or notification of an individual suspected to be on the exclusion list, marketing personnel will immediately notify the Marketing Manager who will notify Security personnel, who will enact the security procedures related to exclude persons as set forth above.
 - 7) The Director of Security/Security Shift Manager will document the incident and notification efforts on an incident report.
 - 8) The Marketing Department will maintain current copies of the exclusion list in the Marketing Department office and all active promotions booths. Designated Marketing personnel will review the exclusion list on a weekly basis.



Procedures to prevent self-excluded persons from gambling

Resorts World Casino New York City prohibits self-excluded persons from gambling.

- 1. Resorts World Casino New York City 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 under 18 Pa.C.S. § 3503 (relating to criminal trespass) 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 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. Resorts World Casino New York City's security department and the NYGC 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. RWCNYC maintains the official self-exclusion list and notifies NYGC of additions, deletions, changes and other updates to the list by first class mail or electronically. The notice provided by RWCNYC 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 selfexclusion.
 - 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 RWCNYC.
 - h. The notice provided to slot machine licensees by RWCNYC 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. Resorts World Casino New York City shall maintain electronic and hard copies of the self-exclusion list provided by the Security Department 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 acknowledged by Director of Security or his designee to the Casino Compliance Representative.
- b. 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 RWCNYC to: the Surveillance Department, Slots Department, Marketing Department, Cashier/Cage Department, and Operational Accounting Department. The Director of Security and Vice President of Surveillance are responsible for ensuring that all employees of their 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. Directors of the other departments listed above are responsible for ensuring all managers and supervisors and above of their departments review the information and photographs of 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. All 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 Database Marketing Manager 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 Resorts World Casino New York City. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Resorts World Casino New York City 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 Database Marketing 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 Resorts World Casino New York City. 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 Database Marketing Manager 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 Resorts World Casino New York City. 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-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 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 an RGA. At that point, (RGA) DOES NOT do the intake, but should explain the highlights of the program (RGA should be familiar with the FAQs of self-exclusion as set forth in the state's Self-Exclusion brochure). If the patron wishes to continue the RGA should proceed with the self-exclusion or make an appointment for the self-exclusion intake if the individual wants to request voluntary self-exclusion. RGA should provide copies of the Forms to the individual. All contact with employees and RGA 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 Director of Security/Security Shift Manager for comparison and consultation of physical features/photographs consistent with those identified on the hard copy of the self-exclusion list published by RWCNYC and entered into the player tracking system. If a comparison match is indicated, the Director of Security/Security Manager will verify the identification of the individual and will immediately contact the Casino Compliance Representative on duty, NYPD and Surveillance. The individual will be escorted off the gaming floor by security and/or the Casino Compliance Representative and the NYPD. 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 RWCNYC offices or the offices of the NYPD for processing (including arrest for trespass pursuant to 18 Pa.C.S. 3503). 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 RWCNYC 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 Compliance Manager of the incident.
 - 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 Executive Director of Security ultimately forwards a copy of the report to President and CEO.
 - 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 Director of RWCNYC Problem Gambling via email within 24 hours of the incident with a copy to the President and CEO.



- b. <u>Surveillance Department-</u> 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 Vice President of Surveillance 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 or 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 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 log report.
- c. <u>Slots Department-</u>All slot ambassadors are responsible for the visual monitoring of patron activity on the gaming floor. Slot ambassadors 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 ambassador 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 ambassador will immediately notify the Security personnel who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) The Director of Security/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- d. <u>Cashier's Cage-</u> 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.
 - 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 Operational Accounting or their designee.
 - 2) The Director of Operational Accounting will notify the Security Department, who will enact the security procedures related to self-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 NYGC requests remittance.
- 4) The Security Executive Director/Security Shift Supervisor will document the incident and notification efforts of the Cage on an incident report.
- e. <u>Marketing Department-</u> Individuals who are on the self-exclusion list will have their names and brief physical descriptions entered on the player tracking system by the Database Marketing Manager within 5 business days after the day notice is mailed or transmitted electronically to Resorts World Casino New York City. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at Resorts World Casino New York City 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 Player's Club Card. The government issued photo identification will be scanned into the player tracking system. Marketing will utilize a second address for mailing if requested with proof of residency, but both addresses will appear in the system.
 - 2) A Player's Club Card will not be issued to an individual who is flagged in the player tracking system as being self-excluded.
 - 3) Only valid Player's 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 Director of Security/Security Shift Manager will document the incident and notification efforts on an incident report.



Procedures to prevent intoxicated patrons from engaging in gaming activities

Resorts World Casino New York City will prevent intoxicated patrons from engaging in gaming activities and will assist in arranging food and a safe departure or accommodations.

- 1. Resorts World Casino New York City has trained its Security, Surveillance, Valet, Beverage, appropriate employees from the Restaurant Department, Slot Operations Supervisor, Slot Operations Manager, and Slot Technician Manager employees who have patron contact in the T.I.P.S. Program as set forth in the SECTION 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 and is provided with food and safe transportation or accommodations.
- 3. Specific departments have duties and responsibilities as set forth below:
 - a. <u>Security Department-</u>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 T.I.P.S. training materials Exhibit "K".
 - 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 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 NYPD assigned to Resorts World Casino New York City 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 personnel will immediately notify NYPD. Security personnel shall remain with the intoxicated patron until arrangements for their safe departure have been secured.

- 3) If the patron has valet parked their vehicle, the car will not be returned to them until satisfactory and safe travel arrangements have been made.
- 4) Security officers shall document the incident and interventions provided to the intoxicated patron on an incident report.
- b. <u>Surveillance Department-</u>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. <u>Slots Department-</u>Upon observation of a patron who appears to be visibly intoxicated, slot ambassadors will immediately notify the Slots Manager who will notify Security personnel, who will enact the procedures as set forth above. The Director of Security/Security Shift Manager 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, as set forth in the T.I.P.S. training materials Exhibit "K", 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 Food and Beverage Manager if a patron appears to be visibly intoxicated as set forth in T.I.P.S. training materials Exhibit "K". 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. The Food and Beverage Manger will notify Security officer(s) who 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 Director of Security/Security Shift Manager will document the incident and notification efforts on an incident report.
- e. <u>Valet Department-</u>Valet personnel with patron contact will notify their on-duty supervisor if they suspect that a patron is intoxicated and attempts to obtain their car to leave the facility. The valet supervisor will notify Security to enact the procedures set forth above. Security officer(s) will assist in the refusal to return a parked car to an intoxicated patron. The valet supervisor will document the incident and notification efforts on an incident report.



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

Resorts World Casino New York City 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 as Exhibit "A" with the RWCNYC Problem Gambling Plan and the specific locations for the signs are set forth in Exhibit "A". For purposes of this section, the term "advertisement" means marketing materials including signs, billboards, print, radio and advertisements communicated through television, emails or cellular phone text messages and any notice or communication to the public through broadcasting, publication, mailing or other means of dissemination. The Director of Marketing is responsible for reviewing all signs and materials offered to the public and for submitting signs and materials to the New York Gaming Commission for approval.

- 1. Resorts World Casino New York City will post a minimum of 20 signs bearing the gambling assistance message which is the phrase: "PLAY RESPONSIBLY" Call 1-877-8-HOPENY". The complete text of the sign is as set forth in Exhibit "A". 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, as set forth in Exhibit "A".
- 2. Resorts World Casino New York City will print the gambling assistance message, "PLAY RESPONSIBLY" Call 1-877-8-HOPENY" on all marketing or advertising materials that are offered to the general public, including signs, billboards, and print, radio and television advertisements.
- 3. Resorts World Casino New York City 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 under 18 Pa.C.S. § 3503 (relating to criminal trespass) if the person is on the gaming floor or engaging in gaming activities." Exhibit "A"
- 4. Resorts World Casino New York City will post signs with the phrase "No person under the age of 18 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. Resorts World Casino New York City advertisements will not use or depict individuals who appear to be under 18 years of age.
- 6. Resorts World Casino New York City will discontinue as expeditiously as possible the use of a particular advertisement upon receipt of written notice from the Board that the Board has determined that the use of the particular advertisement in, or with respect to, this State of New York could adversely impact the public or the integrity of gaming.
- 7. Resorts World Casino New York City 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 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, Web sites 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, webpage or other print advertisement (Attachment I).
- 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 (Attachment I).
- 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 Gaming Commission.
- 11. All advertisements on social media sites must include the gambling assistance message. This includes the gambling assistance message on the homepage and profile page of each social media site as well as on each advertisement posted to the social media site. The height of the font used for the gambling assistance message 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 webpage or the advertisement posted to the social media site.

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

Resorts World Casino New York City will continue, through the efforts of its Problem Gambling Committee, to identify and implement appropriate programs to support efforts to control problem gambling.



Procedures to prevent cashing of certain checks for patrons

Resorts World Casino New York City prohibits the cashing of any check except a personal check, a check issued to a patron by Resorts World Casino New York City 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. Resorts World Casino New York City cashes personal checks and checks issued by Resorts World Casino New York City 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 Resorts World Casino New York City's approved Accounting and Internal Controls and as set forth in the section titled *Procedures to prevent underage gambling*, section titled *Procedures to prevent excluded persons from gambling* and section titled *Procedures to prevent self-excluded persons from gambling*.
- 3. Resorts World Casino New York City will not cash third party checks, checks from any government agency issued for any purpose, or paychecks.
- 4. No one in Resorts World Casino New York City Management or Ownership may authorize an exception to the cashing of only personal checks or checks issued to a patron by Resorts World Casino New York City.

SECTION #22

Procedures relating to promotions and promotions advertising

Resorts World Casino New York City intends to use marketing promotions as part of its overall marketing strategy. Any person wishing to take part in any promotion must be a valid player club card holder and cannot be on either the Self-Exclusion List or the Exclusion List.

Resorts World Casino New York City 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 "PLAY RESPONSIBLY! Call (877) 8-HOPENY" 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 18 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 Resorts World Casino New York City for a minimum of 5 years.
- 3. Resorts World Casino New York City 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, Resorts World Casino New York City will not post the rules of the promotion listed in item #1.

Advertisement Requirements

Resorts World Casino New York City will adhere to the following guidelines when conducting advertising of promotions:

- 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 "PLAY RESPONSIBLY! Call (877) 8-HOPENY" on all printed materials

Required Notifications

At least two (2) business days prior to conducting a promotion, Resorts World Casino New York City will provide the previously referenced rules of the promotion to:

- 1. The Casino Enforcement Office
- 2. The RWCNYC Office of Gaming Operations
- 3. The Department of Revenue

Prohibited Activities

Resorts World Casino New York City 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 or directed to minors;
- 3. Promotes the consumption of alcohol while gaming; and
- 4. Violates any federal, state or local law

Resorts World Casino New York City will immediately discontinue the use of any promotion or advertisement upon receipt of written notice from the Board to do so.



Problem Gambling Prevention Protocols in Casino

1. <u>Patronizing of Amenities</u>

(i) Patrons of Food & Beverage Outlets

1. Dining Guests of Genting Palace and RW Prime

Any individual who appears to be under the age of 30, as set forth in the T.I.P.S, training materials Exhibit "K", will be required to present valid government issued photo identification.

2. Patronizing Bars and the Nightclub

Any individual who appears to be under the age of 30, as set forth in the T.I.P.S. training materials Exhibit "K", will be required to present valid government issued photo identification.

3. Patronizing the Food Court

Any individual who appears to be under the age of 30, as set forth in the T.I.P.S. training materials Exhibit "K", will be required to present valid government issued photo identification.

(ii) Patrons of Retail Outlets

Any individual who appears to be under the age of 30, as set forth in the T.I.P.S. training materials Exhibit "K", will be required to present valid government issued photo identification.



3. Genting Rewards Player's

(a) Activation of Genting Rewards Player's

All Resorts World Casino New York City employees involved in the activation of a Genting Rewards Player's will be permitted by the Board as a Gaming Employee.

(i) Players Club Information Desk

A patron may obtain a Genting Rewards Player's at the Players Club desk in the lobby outside the gaming floor. A Players Club representative of Resorts World Casino New York City will answer any questions which the patron may have regarding the various Genting Rewards Player's and will explain the registration process. After a patron has selected the membership that he would like to purchase, the Players Club representative asks for the patron's driver's license in order to confirm that the patron is at least 18 years of age. The patron will also be given a disclaimer to read and acknowledge which provides the rules and restrictions relating to the use of the Genting Rewards Player's Card while authorizing Resorts World Casino New York City to use the patron's driver's license information. The patron's driver's license is swiped which allows for the capture of relevant personal information.

If the patron does not have a driver's license, another valid form of government-issued photo identification is required and the patron's personal information is manually inputted by the Players Club representative.

A cross-reference with the exclusion and self-exclusion lists is performed to ensure that the patron's name does not appear on those lists. If the patron is not identified on the exclusion or self-exclusion lists, then the Casino Access database will take the information from the patron's driver's license or the personal information manually entered and will direct an embossing machine to print the Genting Rewards Player's Card with the patron's name.

The Players Club representative has the patron sign the Genting Rewards Player's Card. The Players Club representative explains to the patron that the Genting Rewards Player's Card is only valid for the length of the membership and that he is eligible to bring a guest to the casino floor with him as long as the guest enters the casino at the same time as the membership holder. If the guest appears to be under the age of 30 the guest will be required to present valid government issued photo identification. The Players Club representative further explains that the Genting Rewards Player's Card must be used at a terminal at the casino entrance in order to gain admission. Lastly, the customer service representative advises the membership holder that the Genting Rewards Player's Card is to be maintained on his person while on the gaming floor and that he must also have a form of valid government-issued photo identification.



EXHIBITS

- A. PLANS FOR POSTING SIGNS
- B. NYCPG CURRICULUM
- C. PROBLEM GAMBLING EMPLOYEE TRAINING PROGRAM
- D. BROCHURES FROM NYCPG
- E. VOLUNTARY SELF-EXCLUSION
- F. SIGN-IN, SIGN-OUT SHEET (TRAINING)
- G. RWCNYC TRAINING CERTIFICATE
- H. PROBLEM GAMBLING TREATMENT AND ASSISTANCE RESOURCES
- I. BACKSIDE OF PLAYERS CARDS (AFFIXED WITH PROBLEM GAMBLING MESSAGE/CONTACT)
- J. BACKSIDE OF SLOT VOUCHERS (AFFIXED WITH PROBLEM GAMBLING MESSAGE/CONTACT)
- K. T.I.P.S. PROGRAM

ATTACHMENTS

A. PRINT ADVERTISEMENT, BILLBOARD

WORKFORCE ENHANCEMENT FACTORS

APPENDIX X. A.6-2. Gambling Related Incident Report

RESORTS WORLD CASINO NEW YORK CITY GAMBLING RELATED INCIDENT REPORT



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						INCIDENT	#:
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