

## **IDENTIFICATION OF PROBLEM GAMBLING**

### **EXHIBIT X. A.3**

#### ***Staff Training Responsible Gambling***

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

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

1. Procedures on how to handle persons who are displaying signs of problem gambling.
2. Procedures designed to prevent service of alcohol to visibly intoxicated gaming patrons.
3. Procedures designed to prevent persons from gaming after having been determined to be visibly intoxicated.
4. Procedures for the dissemination of written materials to patrons explaining the self-exclusion program.
5. Procedures for removing an excluded person, an underage individual, or a person on the self-exclusion list from our facility including, if necessary, procedures that involve obtaining the assistance of appropriate law enforcement personnel.
6. Procedures for preventing an excluded person or a person on the self-exclusion list from being mailed any advertisement, promotion, or other target mailing no later than five business days after receiving notice that the person has been placed on the excluded person or self-exclusion list.
7. Procedures for preventing an individual under 18 years of age from receiving any advertisement, promotion, or other target mailing.
8. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from having access to or from receiving complimentary services or other like benefits.
9. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from cashing checks.
10. Procedures to prevent an excluded person, an individual under 18 years of age, or a person on the self-exclusion list from being issued a Sterling Forest Resort Player's Card.

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

All employees will spend one hour annually in reinforcement training solely and specifically dedicated to the issues of problem gambling, the prohibition of underage gambling, the prohibition of gambling by intoxicated patrons, and the identification and ejection of excluded and self-excluded persons.

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

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