

## **SELF EXCLUSION POLICIES AND PROCEDURES**

### **EXHIBIT X. A.4**

#### ***Self-Exclusion Policies and Procedures***

Sterling Forest Resort has created and will implement 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 table games, gaming machines, food outlets, entertainment, and events. Once self-excluded, the patron is banned from coming onto Sterling Forest Resort's property for any reason.
- The Self-Exclusion Program will be well advertised on-site at the gaming facility and will be 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 Responsible Gaming Support Center (RGSC) Responsible Gambling Ambassadors (RGAs) will be available to assist 20 hours a day, 7 days a week to facilitate exclusions. RGSC RGAs will be able to clearly, respectfully, and tactfully explain the self-exclusion process, options, and breaches of the exclusion.
- The Sterling Forest Resort RGSC will be utilized to complete the self-exclusion process.
- A player tracking system will be utilized to remove self-excluded patrons from mailing lists and to monitor any access/use of a reward card after self-exclusion has been requested.
- A separate system will be 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 will be consistently monitored and updated to reflect additions and expired self-exclusions.
- Updated self-exclusion lists will be regularly sent to relevant departments whose main job and function is to facilitate and maintain integrity of the Self-Exclusion Program (Surveillance, Marketing, Finance, etc.).
- Self-excluded patrons will be provided resources on problem gambling in the form of palm cards and brochures.
- Self-excluded patrons will be required to wait until their entire exclusion period has expired before they can return to the facility.
- Self-excluded patrons will stop receiving promotional materials as soon as possible following the start of the exclusion.
- A detection and enforcement procedure will be in place to identify and remove self-excluded patrons.
- Once the exclusion period has expired, the self-excluded person will not be automatically removed from the exclusion list. The patron must make a formal request before being removed.
- A Self-Exclusion Committee comprised of Executive Level staff will review requests for reinstatement and will make a decision on a case-by-case basis.
- The reinstatement process will require the individual to complete an education program on problem gambling and the individual will have to provide proof of completion with their request letter for reinstatement.
- Additionally, a mandatory meeting will be held at the end of the exclusion period that will include an evaluation of the self-excluder's gambling situation, information about responsible gambling, and referrals to additional resources if needed. The self-exclusion period will continue if the mandatory meeting is not attended.

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The procedure for self-exclusion is as follows:

### **1. Request for Self-Exclusion in Person**

- a. Request for Self-Exclusion will be able to be submitted by appearing in person at the Sterling Forest Resort's Security Command Center or RGSC.
- b. Person requesting self-exclusion will have to complete and submit a Voluntary Self-Exclusion Form (Appendix X. A.4-1.) and a signed release and present proper identification.
  - i. ID must be valid and contain the person's signature and photograph.
  - ii. Verification of identity will be confirmed by an authorized Sterling Forest Resort employee, preferably an RGA or 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 Self-Exclusion Form.
- c. All information as follows will appear on the Voluntary Self-Exclusion Form and must be completed in its entirety by the person requesting Self-Exclusion and the Sterling Forest Resort 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 driver's license standards
  - viii. Sterling Forest Resort's 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 Sterling Forest Resort to enforce my exclusion until the expiration of the exclusionary period I have requested. I understand that if found within the Sterling Forest Resort's facility after having been voluntarily excluded, I will be subject to arrest for criminal trespass. Furthermore, I authorize Sterling Forest Resort 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 will be given to the person requesting exclusion.

### **2. Request for Self-Exclusion by Mail**

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- a. Request for Self-Exclusion can be submitted by mail addressed to the following:

Sterling Forest Resort's  
Director of Security  
[Address to be determined]
- b. Person requesting Self-Exclusion by mail will have to complete and submit a Voluntary Self-Exclusion Form (Appendix X. A.4-1.), a signed release, and proper identification.
  - i. ID must be valid and contain the person's signature and photograph.
  - ii. Request for self-exclusion 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 Self-Exclusion Form and must be completed in 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 driver's license standards
  - viii. Sterling Forest Resort's 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 Sterling Forest Resort to enforce my exclusion until the expiration of the exclusionary period I have requested. I understand that if found within the Sterling Forest Resort's facility after having been voluntarily excluded, I will be subject to arrest for criminal trespass. Furthermore, I authorize Sterling Forest Resort 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. Sterling Forest Resort or an appointed RGA will create and maintain an accurate list of all past and present Self-Exclusions which will include the following information:
  - i. Date of Self-Exclusion

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- ii. Name
  - iii. Address
  - iv. Phone Number
  - v. Date of Birth
  - vi. Social Security Number (optional)
  - vii. Length of Exclusion
  - viii. Reason ("Voluntary Self-Exclusion")
  - ix. Reinstatement Date
- b. Sterling Forest Resort's Security Department will create a file for any requested exclusion pursuant to **Section 5.117.6** of the New York Codes, Rules and Regulations, Title 9. Responsible Gaming and Self-Exclusion that 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. Sterling Forest Resort will not divulge any name on the Master Self-Exclusion List other than to authorize Sterling Forest Resort employees whose duties and functions require access to such information, the New York State 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. An alert will be sent once a Sterling Forest Resort's Rewards card of a self-excluded person is inserted into a video gaming machine or in a promotional kiosk.
  - ii. If a self-excluded person presents their Rewards Card to a representative at any Rewards booth, an alert will be sent.
  - iii. If a self-excluded person attempts to redeem a Limited Voucher at any Cashier's 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. RGAs 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 will be adhered to:
- i. Security will be notified immediately with the location of the self-excluded person.
  - ii. Surveillance will be notified immediately with the location of the self-excluded person.
  - iii. Security (or RGA) will immediately make their way to the location provided.

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- 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 will be immediately notified and requested to arrest the self-excluded person for criminal trespass. Authorized employees of Sterling Forest Resort shall be empowered to swear the complaint against the excluded person.