

Exhibit VIII.A.14B Disciplinary Actions Brought Against Applicant Parties

1. On July 14, 2009, Seneca Gaming Corporation received a proposed Notice of Violation dated July 13, 2009, or the 2009 NOV, from the Seneca Gaming Authority, or the SGA, alleging fifteen violations of certain sections of the Class III Gaming Ordinance and the Seneca Nation of Indians-State of New York Compact (Compact), as well as SGC's corporate charter. In addition to SGC, eleven employees received similar notices arising out of the same set of facts, alleging from five to twelve violations of the provisions noted above. Each of the alleged violations was attributable to SGC's accounting treatment of an alleged table games inventory (i.e., gaming chips) discrepancy of \$25,971 that arose due to a single human error during an ordinary course table games move on April 3, 2009. On August 17, 2009, SGC and each of the affected employees received a proposed final assessment, which included proposed fines of \$10,000 payable by SGC, and proposed fines payable by four out of the eleven individual employees cited originally, ranging from \$500 to \$2,500.

On December 18, 2009, the SGA Commission determined that the SGA's action with respect to seven of the affected individuals did not constitute a "Notice of Violation" and that the matter had been settled from the SGA's perspective (confirming that the matter would not have any negative licensing implications for the individuals). Also on that date, the SGC and the SGA entered into a settlement agreement pursuant to which the proposed Notices of Violation issued to the four remaining individuals (with proposed fines ranging from \$500 to \$2,500) were vacated and dismissed in their entirety, while the SGA agreed that the proposed Notice of Violation issued to SGC would be vacated and dismissed without further action of the SGA on March 15, 2010. The settlement agreement required that the SGC engage in certain compliance-related efforts, and remit to the SGA an administrative fine of \$10,000 to cover SGA costs.

2. Except as noted below, no Applicant Party has had a gaming-related license denied, suspended, withdrawn or revoked; nor is there any pending proceeding that could lead to any of these conditions.

- a. On September 22, 2011, the Seneca Gaming Authority (SGA) suspended the Class III Key Gaming Employee License of [REDACTED]

[REDACTED]
(*Seneca Gaming Corporation and Seneca Niagara Falls Gaming Corporation v. Harvest Trends, Inc. et al. (NYS Supreme Court, Niagara County, Index No. 140370)*), [REDACTED]
[REDACTED]

- b. On July 15, 2013, the Seneca Gaming Authority (SGA) also provided notice of its denial of the Class III Primary Management Official License of [REDACTED]

