

X.A.6 HISTORICAL EFFORTS AGAINST PROBLEM GAMBLING

The proposed owner of the proposed Gaming Facility (“Traditions”) does not own or manage any other casino operations and, therefore, does not have a history of efforts to address problem gambling. The proposed manager of the new gaming facility, however, a subsidiary of Seneca Gaming Corporation (hereinafter referred to as “the Manager”) currently operates through its other subsidiaries three (3) gaming facilities in Western New York pursuant to the Seneca Nation of Indians-New York State Compact, the first operation opening in 2002. The Manager has conducted (and continues to conduct) a Responsible Gaming Program at its properties consisting of the following elements:

1. Employee Training. All employees who have regular contact with gaming patrons are required to undergo the Manager’s on-line Responsible Gaming training. A list of those job titles who must undergo the mandatory Responsible Gaming training is attached hereto as Tab #1. Each employee must pass an on-line test in connection with this training. Attached hereto as Tab #2 are screen shots of the required training and testing.
2. Voluntary Exclusion. Appendix B, Section 19 of the Seneca Nation-State of New York Compact pursuant to which the Manager conducts casino operations in New York provides for patron voluntary self-exclusion. Patrons who desire to self-exclude may do so by contacting the Seneca Gaming Authority and completing a self-exclusion request form. Once this is done the gaming authority provides the pertinent information to the Manager’s Credit Dept., which inputs the information into the Manager’s Casino Management computer system. See Casino Credit Standard Operating Procedure – Exclusion Flag Maintenance attached to Exhibit X.A.1. as Tab #2. As a result of this action, the patron’s account is essentially frozen and he/she cannot be issued complimentaries or receive direct mail from the casino. Furthermore, a self-excluded patron is regarded as a trespasser and is subject to arrest and prosecution if he/she returns to any of the Manager’s properties while the self-exclusion is in effect. Any winnings or slot jackpots won by any such a self-excluded patrons are forfeited.
3. Credit Limitation. Appendix B, Section 18 of the Nation-State Compact provides that a credit patron who wishes to limit his/her credit activity may do so by submitting a written request to the gaming authority, which is then communicated to the Manager’s Credit Dept. See Credit Dept. procedure 1120 1027 (Patron Voluntary Request For Suspension) attached to Exhibit X.A.1. as Tab #3.

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4. Responsible Gaming Information. Patrons who request information regarding assistance for potential problem gambling are directed to the property's Cashiers Cage, where they may obtain information detailing available resources.
5. Employee Assistance Program. The Manager is aware that its employees are equally susceptible to gambling problems as patrons. To that end, the Manager's Human Resources Department maintains an Employee Assistance Program (EAP) under which employees may seek assistance for any number of personal problems, including problem gambling.
6. Unattended Minors. The Manager's training as described in paragraph 1 above includes instruction on how employees are to address unattended minors in the public areas of the facility.
7. Exclusion of Minors From the Casino. Although the Nation-State Compact permits persons over the age of 18 to enter the casino and engage in gaming activity, the Manager has made a policy decision to exclude persons under the age of 21 (subject to very limited exceptions) from the casino areas. In furtherance of this policy, the Manager's Security Departments have security officers stationed at each casino entrance 24 hours per day. These security officers are instructed to request identification from any person appearing to be under the age of 30. Each entry point is equipped with state of the art equipment for scanning tendered identification credentials to detect and identify counterfeits or altered credentials. In addition, table game employees and beverage servers are under instruction to "card" those appearing to be under the age of 30.
8. Responsible Alcoholic Beverage Service. Closely related to problem gambling is the over consumption of alcoholic beverages. All of the Manager's beverage service personnel are required to be "TIPS" certified. This certification follows training and testing in a course of instruction that teaches servers to prevent patrons from becoming intoxicated by pacing of beverage service, to identify patrons who are visibly intoxicated, and to discontinue alcoholic beverage service to any such person.
9. Metrics: The Manager uses the following metrics to assess the vitality of its Responsible Gaming Program. These metrics are reviewed by management on a regular and continuing basis in order to detect trends and to ensure that existing systems and procedures are working properly:

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- a. Number of self-excluded patrons processed through the casino management system;
- b. Number of credit suspensions processed;
- c. Number of self-excluded patrons detected in the casino; and
- d. Number of underage persons turned away from casino entry points or apprehended in the casino.

In conclusion, the Manager has historically and presently has in effect a comprehensive Responsible Gaming program, including the necessary systems and training. This program can easily be adapted to the new gaming facility's operations and the requirements of Section 1362.