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- reinforcement trainings regarding compulsive and problem gambling.
16. 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.

SECTION #2

Commitment to train employees and annual reinforcement training

MEA will educate all employees regarding compulsive and 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 MEA will be trained in accordance with the employee training program. Food and Beverage, as well as Security Department employees, will be trained in the RAMP program. 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 CPG Plan. The compulsive and problem gambling training program includes training and procedures regarding:

1. Characteristics and symptoms of compulsive behavior, including compulsive and problem gambling.
2. *The relationship of compulsive and problem gambling to other addictive behavior.*
3. The social and economic consequences of compulsive and problem gambling, including debt, treatment costs, suicide, criminal behavior, unemployment and family counseling.
4. Techniques to be used when compulsive and problem gambling is suspected or identified.
5. Techniques to be used to discuss compulsive and 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 21 years of age from receiving any advertisement, promotion or other target mailing.
12. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from having access to or from receiving complimentary services

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- or other like benefits.
13. Procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from cashing checks.

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 compulsive and 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 compulsive and 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.

Appropriate employees from the Security and Food and Beverage Departments will be trained in the Pa. R.A.M.P. Program.

SECTION #3

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

The Compulsive and Problem Gambling Committee is charged with reviewing the CPG Plan and ensuring its effective implementation during day-to-day operations of the facility. Compulsive and Problem Gambling Committee shall monitor, adjust, and respond to concerns involving the maintenance of the Compulsive and 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 Compulsive and Problem Gambling Committee shall consist of the President & Chief Executive Officer, Vice President of Human Resources, Director of Security, Vice President of Gaming Operations, Director of Surveillance, Casino Controller, Compliance Specialist and H.R. Training Manager. The Compliance Specialist shall serve as liaison to the PGCB with regard to issues related to the content and administration of the CPG Plan.

The Compulsive and 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 the OCPG upon request, at least annually.

SECTION #4

Duties and Responsibilities of Employees Designated to Implement or Participate in the

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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 MEA are expected to be knowledgeable of, attend trainings and follow approved procedures consistent with, the CPG 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 Compulsive and 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 Council on Compulsive Gambling of Pennsylvania ("CCGP") to conduct the orientation and reinforcement.
3. The Compulsive and 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 CCGP to provide and/or review the literature/brochure content.
4. The Compulsive and 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. **Security Department**-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.
 - b. **Surveillance Department**-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 Director of Surveillance and surveillance personnel assigned to surveillance duties are responsible for monitoring these areas for patron intoxication, patrons appearing under the age of 21 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. **Slots Department**-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 attendants 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

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this plan.

- d. **Table Games Department**-Table Games 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. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual is not underage or on the self-exclusion or exclusion list. Procedures for the Table Games Department are set forth in this plan.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are underage or on the self-exclusion, exclusion or voluntary credit suspension lists do not receive credit. The credit department receives the voluntary credit suspension list from the PGCB.
- f. **Cashier's Cage**-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.
- g. **Marketing Department**-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 Bally's SDS system, and flagged, within 5 business days of MEA's receipt of the lists from the PGCB.
- h. **Food and Beverage Department**-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. Procedures for Food and Beverage are set forth in this plan.
- i. **Valet Department**-Valet is responsible for preventing intoxicated patrons from obtaining a valet parked car to leave the facility.

SECTION #5

The Responsibility of Patrons with Respect to Responsible Gambling

1. MEA utilizes a brochure, which provides patron responsibilities regarding responsible gambling. The brochures from the CCGP which MEA will display at its licensed facility along with customized MEA 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.

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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 Compulsive and Problem Gambling Behavior

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

SECTION #7

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

MEA 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.

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. Security 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 to the supervisor should include (if possible) the patron's name and specific reasons for concern. The concern should not be entered into the player tracking system.
3. Employees should ask themselves, before reporting:

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3. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
4. The Director of Security/Security Shift Manager 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 and on the backside of all ticket vouchers which provides the phrase "GAMBLING PROBLEM? CALL 1-800-GAMBLER"

SECTION #9

Procedures for responding to patron requests for information

MEA will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the self-exclusion program, the voluntary credit suspension program, and treatment options.

1. MEA will provide brochures which are customized for MEA in display cases located at Casino Security Podium and Security Office, Player's Club Booth, Credit Booth and Cashier Cage. The other listed items Security Podium, Cage and Player's Club Booth and will be provided to guests upon their request:
 - a. Responsible Gaming brochure (Display cases)
 - b. Compulsive and Problem Gambling brochure (Display cases)
 - c. Self-Exclusion Program Brochure (Display cases)
 - d. Voluntary Credit Suspension Brochure (Display cases)
 - e. Request for Voluntary Self-Exclusion form (Upon request)
 - f. Treatment provider list (Upon request)
 - g. Gamblers Anonymous Pennsylvania Directory (Upon request)
 - h. GAM-ANON Pennsylvania Directory (Upon request)
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 and on the backside of all ticket vouchers, which provides the phrase "GAMBLING PROBLEM? CALL 1-800-GAMBLER".
4. Requests for information should never be entered into the player tracking system.

SECTION #10

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.

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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 or other supervisory employee* and the section titled *Procedures for providing information to individuals with suspected or known compulsive and 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, security and if necessary, the Manager on duty, however the identity should never be discussed or disclosed to any other employee of MEA or individual who is not one of the designated employees unless directed to do so by any of the above referenced individuals or a PGCB employee.

SECTION #11

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

MEA will provide or direct patrons to the location of printed material to inform patrons about compulsive and problem gambling, responsible gaming, the voluntary credit suspension program, the self-exclusion program and treatment options and will review and update the printed materials as necessary.

1. MEA will post signage as set forth in the section titled *Plans for posting signs*.
2. MEA will provide printed information in display cases located at Casino Security Podium and Security Office, Player's Club Booth and each Cashier Cage.
3. On the backside of all Player Cards and on the backside of all ticket vouchers, 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, MEA will print and/or provide the phrase "GAMBLING PROBLEM? CALL 1-800-GAMBLER."

SECTION #12

Estimated cost for development, implementation and administration of the plan

MEA has developed, implemented and is administering this plan with an initial annual budget of \$25,000.00.

The Plan is provided with an initial annual budget of approximately \$25,000.00 to carry out the details as outlined herein. The cost of the Plan will include employee training, printing signage, printing brochures and literature, reinforcement training sessions, outside presenters as necessary, sponsorships/memberships, outreach and incidental fees associated with Plan.

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SECTION #13

List of community, public and private treatment services

MEA will provide or direct patrons to the location of printed material to inform patrons about treatment options and will review and update the printed materials as necessary. Providing this list *does not* create a duty for MEA or its employees to refer compulsive and problem gamblers to qualified treatment professionals.

1. MEA 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 compulsive and problem gambling behavior*, the section titled *Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available* and upon request.
2. MEA will provide such information located at Casino Security Podium and Security Office Player's Club Booth and each Cashier Cage, upon patron request.

SECTION #14

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

MEA will educate all employees regarding compulsive and 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 MEA will be trained in accordance with the employee training program. Appropriate employees, as specified herein, will be trained in the PA Responsible Alcohol Management 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 compulsive and 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. This record of training attendance will be kept on file in the Human Resources Department.
2. Verification of RAMP training will be demonstrated pursuant to the RAMP 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, will include the employee's printed name and employee signature below the following phrase; "This certificate of successful completion of problem gambling

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- awareness training for Market East Associates, LP is hereby granted to".
5. Additionally, the signature of the MEA's President & CEO, and the date of the training will be affixed to the certificate. The certificate of training completion will be awarded after verification of "sign-in," "sign-out" procedures and be kept in the employees personnel file.

SECTION #15

Procedures to prevent underage gambling

Persons under the age of twenty-one (21) ("underage") are prohibited from gambling, or from entering MEA'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. MEA 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*.
2. Prior to entering the gaming floor, all patrons who appear under the age of 30 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 Pennsylvania Department of Transportation or any other state.
 - b. A valid Alcohol Beverage Control Card.
 - c. A valid photo identification issued by the Pennsylvania Department of Transportation 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. **Security Department**-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

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contests or tournaments are conducted, all patrons who appear under the age of 30, as set forth in the RAMP training materials, 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 the RAMP training materials, 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, Pennsylvania State Police (PSP) and surveillance. The underage individual will be escorted off the gaming floor by the security officer(s) and/or PSP 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 to the PGCB and/or PSP 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 the PGCB 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 Casino Controller 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 Director OCPG within 24 hours of the identification of an underage individual who has engaged in gaming activities.

- b. Surveillance Department-Surveillance is responsible for the electronic monitoring of

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all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Director 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.
- c. Slots Department-Slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants 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 21 years of age.
- 1) If any slot attendant 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 attendant will immediately notify Security personnel, who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
- d. Table Games Department-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify underage individuals and prevent underage gaming. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not underage.
- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be underage, the employee will immediately notify Security personnel who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Director/Security Shift Manager will document the incident and notification efforts on an incident report.
- e. Credit Department-Credit Department is responsible for ensuring that individuals

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who are underage do not receive credit.

- 1) If a patron cannot produce legally acceptable government issued photo identification showing proof of age, the Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Credit Executive.
 - 2) If the Credit Executive is unable verify the age of the individual, he will notify the Security Executive Director/Security Shift Manager who will enact the security procedures related to underage gambling as set forth above.
- f. **Cashier's Cage**-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 PGCB requests remittance.
 - 4) The Security Executive Director/Security Shift Manager will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department**- 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 21. 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 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 21 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

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- 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 21, 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 Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
- h. **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 RAMP training materials, 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 21 years of age (as set forth in the RAMP training materials. 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.

SECTION #16

Procedures to prevent excluded persons from gambling

MEA prohibits excluded persons from gambling.

1. MEA shall maintain electronic and hard copies of the most current version of the Exclusion List published by the PGCB 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, Table Games Department and Operational Accounting Department. The Director of the Security and the Director 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. Director of Security and Director of Surveillance 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.

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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 the PGCB and placed on the list, will have their names and brief physical descriptions entered on the player tracking system by the s Database Marketing Manager within 5 business days after the day notice is mailed or transmitted electronically to MEA. 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 MEA. 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 MEA will be deleted, and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotionals. 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 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 Casino Controller or the Director of Security or his designee shall inform the BIE, in writing, of the names of persons that MEA believes are appropriate for placement on the 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 Commonwealth 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 Commonwealth 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 Commonwealth or of licensed gaming therein, or both.
 - d. A person whose presence in a licensed facility would be inimical to the interest of the Commonwealth 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.

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- 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 Commonwealth 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 Commonwealth 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 Commonwealth 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.
6. 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 the PGCB 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 PGCB 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 the PGCB 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 & CEO.
 - 4) The responding Security Officers will complete the necessary reports,

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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 Director of OCPG via email within 24 hours of the incident and will copy Compliance Specialist.
- b. **Surveillance Department-** 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 Director 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 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. **Slots Department-**All slot attendants 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 attendants 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 attendant 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 attendant will immediately notify the Security personnel who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Security Executive Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.

- d. **Table Games Department-**Table Games employees are responsible for the visual

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monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify excluded individuals. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not an excluded person.

- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the exclusion list, the employee will immediately notify the Security personnel who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Security Executive Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are on the exclusion list do not receive credit.
- 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 Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Director/Security Shift Supervisor
- f. **Cashier's Cage**- 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 the PGCB requests remittance.
 - 4) Security Executive Director/Security Shift Supervisor will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department**- Excluded persons, who have been identified by the PGCB 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 MEA. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at MEA 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 promotionals.
- 1) Marketing personnel require legally acceptable government issued photo

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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) 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 excluded persons as set forth above.
- 5) The Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
- 6) 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.

SECTION #17

Procedures to prevent self-excluded persons from gambling

MEA prohibits self-excluded persons from gambling.

1. MEA 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. MEA's security department and the PGCB 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. The PGCB maintains the official self-exclusion list and notifies MEA of additions,

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deletions, changes and other updates to the list by first class mail or electronically. The notice provided by the PGCB 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 self-exclusion.
 - 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 the PGCB.
 - h. The notice provided to slot machine licensees by the PGCB 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. MEA shall maintain electronic and hard copies of the self-exclusion list provided by the PGCB 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 the PGCB to: the Surveillance Department, Slots Department, Table Games Department, Marketing Department, Cashier/Cage Department, and Operational Accounting Department. The Director of Security and Director 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.

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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 MEA. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at MEA 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 MEA. 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 MEA. 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 compulsive and 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 Security. Security DOES NOT do the intake, but should explain the highlights of the program (Security should be familiar with the FAQs of self-exclusion as set forth in the state's Self-Exclusion brochure). Security should contact the Casino Compliance Representative on duty, or Director of OCPG, to make an appointment for the self-exclusion intake if the individual wants to request voluntary self-exclusion. Security should provide copies of the Forms to the individual. All contact with employees and security 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 Security Executive Director/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 the PGCB 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, Pennsylvania State Police and Surveillance. The individual will be escorted off the gaming floor by security and/or the Casino Compliance Representative and the Pennsylvania State Police. 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 PGCB offices or the offices of the Pennsylvania State Police for processing (including arrest for trespass pursuant to 18 Pa.C.S. 3503). Security and/or the

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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 the PGCB 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 Specialist 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 Director of Security ultimately forwards a copy of the report to President & 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 OCPG via email within 24 hours of the incident with a copy to the President and CEO.

b. **Surveillance Department**- 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 Surveillance Director 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. **Slots Department**-All slot attendants are responsible for the visual monitoring of patron activity on the gaming floor. Slot attendants 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 attendant 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 attendant will immediately notify the

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- Security personnel who will enact the security procedures related to self-excluded persons as set forth above.
- 2) The Security Executive Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- d. **Table Games Department**-Table Games employees are responsible for the visual monitoring of patron activity on the gaming floor and areas off the gaming floor where contests or tournaments are conducted in an attempt to identify self-excluded individuals. Table Games employees are also responsible for verifying identification of individuals to ensure that an individual engaging in gaming activities is not a self-excluded person.
- 1) If a Table Games employee identifies, or receives notification, of an individual who is on the gaming floor, in areas off the gaming floor where contests or tournaments are conducted and/or engaged in gaming activities and is suspected to be on the self-exclusion list, the employee will immediately notify Security personnel who will enact the security procedures related to self-excluded persons as set forth above.
 - 2) The Security Director/Security Shift Supervisor will document the incident and notification efforts on an incident report.
- e. **Credit Department**-Credit Department is responsible for ensuring that individuals who are on the self-exclusion list do not receive credit.
- 1) 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 Credit Department employee will not proceed with the creation of a signature file or preparation or increase of a credit limit and will immediately notify the Security Director/Security Shift Supervisor.
- f. **Cashier's Cage**- 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 a self-excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Director of cage/Count or their designee.
 - 2) The Director of cage/Count 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 PGCB requests remittance.
 - 4) The Security Executive Director/Security Shift Supervisor will document the incident and notification efforts of the Cage on an incident report.
- g. **Marketing Department**- 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

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transmitted electronically to MEA. In addition, the account will be flagged any complimentary points that may be due to the patron as a result of gaming play at MEA 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 promotionals.

- 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 Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.

SECTION #18

Procedures to prevent intoxicated patrons from engaging in gaming activities

MEA will prevent intoxicated patrons from engaging in gaming activities and will assist in arranging food and a safe departure or accommodations.

1. MEA has trained its Security and Food and Beverage employees who have patron contact in the RAMP 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:

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- a. **Security Department**-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.
- 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 be 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 PSP or Upper Merion Township Police Department assigned to MEA 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 Upper Merion Township Police Department. 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. **Surveillance Department**-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. **Slots Department**-Upon observation of a patron who appears to be visibly intoxicated, slot attendants will immediately notify the Slots Manager who will notify Security personnel, who will enact the procedures as set forth above. The Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
- d. **Table Games Department**- Upon observation of a patron who appears to be visibly intoxicated, table game employees will immediately notify a Table Games Manager who will notify Security personnel. Security personnel will enact the procedures as set forth above. The Security Executive Director/Security Shift Manager will document

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- the incident and notification efforts on an incident report.
- e. **Credit Department-** Upon observation of a patron who appears to be visibly intoxicated, table games employees will immediately notify a Credit Manager who will notify Security personnel. Security personnel will enact the procedures as set forth above. The Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
 - f. **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 RAMP training materials, 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 RAMP training materials. 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 Pennsylvania State Liquor laws and security will enact the procedures as set forth above. The Security Executive Director/Security Shift Manager will document the incident and notification efforts on an incident report.
 - g. **Valet Department-**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.

SECTION #19

Procedures to ensure that certain individuals may not obtain credit

MEA offers credit at its licensed facility. In order to ensure that individuals on the Voluntary Credit Suspension List ("VCS List") do not obtain credit, MEA instituted the following procedures.

1. A PGCB casino compliance representative ("CCR") will provide the Credit Manager or, in his or her absence, Casino Controller with the advisories of patrons who have requested Voluntary Credit Suspension. Credit Manager or, in his or her absence, Casino Controller will, within 24 hours, forward the advisory to the Credit Department for processing.
2. The Credit Department will maintain a copy of the VCS List and will ensure that the copy of the list is updated within 24 hours after MEA receives the update(s) from the PGCB. The Credit Department will immediately suspend the credit privileges of any individual upon receipt of notice that the individual has been added to the voluntary credit suspension list.

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3. A member of the Credit Department will check the player tracking system for the patron's account and will flag the account to denote credit suspension. As a result, this patron can no longer receive credit from MEA. If the patron does not have an account with MEA, a member of the Credit Department will create a credit account for that patron in the player tracking system and will flag the account to denote the credit suspension.
4. A member of the Credit Department will also manually fill out a Voluntary Credit Suspension / Removal Form. The Voluntary Credit Suspension / Removal Form will be filed in the patron's credit file if that patron has a credit account with MEA. If the patron does not have a credit account, the Voluntary Credit Suspension / Removal Form will be attached to VRCCR's VCS List with the advisory received from the PGCB.
5. A CCR will provide Credit Manager or, in his or her absence, Casino Controller with the advisories of patrons who have been removed from Voluntary Credit Suspension. Credit Manager or, in his or her absence, Casino Controller will forward the removal advisory to the Credit Department for processing within 2 business days of receipt.
6. A member of the Credit Department will remove the patron from all MEA's copies of the VCS List within 3 business days of receipt from the PGCB.
7. A member of the Credit Department will obtain the hard copy of the patron's credit file and re-verify the credit line pursuant to the procedures in 58 Pa. Code 526.3, for establishing a casino credit line.
8. A member of the Credit Department will sign the Voluntary Credit Suspension / Removal Form, including the date and time of removal.
9. A member of the Credit Department will eliminate the credit suspension flag on the patron's account in the player tracking system. If the account in the player tracking system was created for the purpose of designating the person as on the VCS List, the player's account will be deleted.
10. A hard copy of the Removal from Voluntary Credit Suspension advisory will be placed in the patron's credit file if they have an account with MEA or in a separate designate Removal file if the patron has no credit account at MEA.
11. The VSC List will be posted in the Credit Department and Casino Cage.

SECTION #20

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

MEA 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 fonts size are submitted for approval with the CPG Plan and the specific locations for the signs. 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 Director of OCPG for approval.

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1. MEA will post a minimum of 20 signs bearing the gambling assistance message which is the phrase: "Gambling Problem? Call 1-800-GAMBLER". 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.
2. MEA will print the gambling assistance message, "Gambling Problem? Call 1-800-GAMBLER" on all marketing or advertising materials that are offered to the general public, including signs, billboards, and print, radio and television advertisements.
3. MEA 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."
4. MEA will post signs with the phrase "No person under the age of 21 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. MEA advertisements will not use or depict individuals who appear to be under 21 years of age.
6. MEA 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 Commonwealth could adversely impact the public or the integrity of gaming.
7. MEA 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.
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.
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 Director of OCPG.
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

SECTION #21

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

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MEA will continue, through the efforts of its Compulsive and Problem Gambling Committee, to identify and implement appropriate programs to support efforts to control compulsive and problem gambling.

SECTION #22

Procedures to prevent cashing of certain checks for patrons

MEA prohibits the cashing of any check except a personal check, a check issued to a patron by MEA 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. MEA cashes personal checks and checks issued by MEA 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 MEA'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. MEA will not cash third party checks, checks from any government agency issued for any purpose, or paychecks.
4. No one in MEA Management or Ownership may authorize an exception to the cashing of only personal checks or checks issued to a patron by MEA .

SECTION #23

Procedures relating to promotions and promotions advertising

MEA 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.

MEA 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 "Gambling Problem? Call (800) GAMBLER" on all printed materials

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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 21 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 MEA for a minimum of 5 years.
3. MEA 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, MEA will not post the rules of the promotion listed in item #1.

Advertisement Requirements

MEA 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 "Gambling Problem? Call (800)GAMBLER" on all printed materials

Required Notifications

At least two (2) business days prior to conducting a promotion, MEA will provide the previously referenced rules of the promotion to:

1. The PGCB Office of Gaming Operations

Prohibited Activities

MEA 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
4. violates any federal, state or local law

MEA will immediately discontinue the use of any promotion or advertisement upon receipt of written notice from the Board to do so.

SECTION 1

THE LOCATION AND QUALITY OF THE PROPOSED FACILITY, INCLUDING, BUT NOT LIMITED TO, ROAD AND TRANSIT ACCESS, PARKING AND CENTRALITY TO MARKET SERVICE AREA

The Site

The corner of 8th and Market Streets, once a thriving intersection of entertainment and social connections, is now a parking lot ripe for transformation that sits right in the middle of what is probably the highest concentration of retail, restaurant, hospitality, convention, and historic properties in the country.

Once anchored by preeminent department stores such as Lit Brothers, Gimbels, and Strawbridge & Clothier, the Market Street retail corridor was THE destination for residents and visitors coming to Center City. In fact, at one point, it was the busiest retail intersection in America. Although these retail offerings have changed over the years, the Gallery that is immediately across the street and extends up to 11th Street, combined with the stores of Olde City, Chestnut Street, Market Street, and Chinatown, still represent the greatest concentration of retail in Philadelphia.

In addition, two blocks to the east is Independence Hall National Park, which includes Independence Hall itself, the Liberty Bell Pavilion, the National Constitution Center, the National Museum of American Jewish History, the Philadelphia Visitors' Center, the Hotel Monaco, and a host of other historic sites such as Betsy Ross' house, Benjamin Franklin's grave, and Christ's Church. Two to three blocks to the west, is the Pennsylvania Convention Center, the Marriott Convention Center Hotel, the Loew's Hotel, the Reading Terminal Market, the Hard Rock Café, and other convention-related amenities.

Together, these retail, restaurant, and hospitality offerings, combined with so many of Philadelphia's historical and cultural sites, make the East Market Street corridor one of the top tourist and convention destinations in the country, drawing millions of visitors each year.

Finally, situated at one of the most significant transit hubs in the City of Philadelphia, the only place where the New Jersey PATCO line and SEPTA's Market-Frankfort and Broad-Ridge subway lines connect, 8th & Market is ideally positioned to significantly increase the spending of both tourists and conventioners already visiting the area, attract more tourists and conventioners, and cause a dramatic ripple effect throughout this commercial, entertainment, convention, and historic corridor.

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Accessibility

MARKET8's unique location is within easy walking distance of the entire Philadelphia urban core; and Philadelphia's downtown is the third most-populated residential community in the country. Accordingly, 17,500 pedestrians already pass by this site daily.

If patrons are planning to drive to the site, the Vine Street Expressway (I-676) is only three blocks from MARKET8. The Vine Street Expressway provides access to Interstates I-76 and I-95, which are major thoroughfares that link the city to the Tri-State area, and the Washington, D.C., and New York Metro areas.

MARKET8 will provide valet services, self-parking options and underground parking lots for the convenience of its visitors, specifically:

- 1,000 underground valet parking spaces, accessed via MARKET8's interior "boulevard" extending from 8th Street to 9th Street, running parallel to Market Street.
- 340 self-park/assisted parking spaces across 8th Street at 733 Chestnut Street; with entrance on 8th Street and exits on both 8th Street & Chestnut Street.

Additionally, there are 5,431 spaces within a five-minute walk, 11,734 spaces within a ten-minute walk, and 20,292 spaces within a 15-minute walk. This is described in greater detail on pages 28 & 29 of the Traffic Study.

Uniquely central to the city's busiest public transportation hubs, MARKET8 will be easily accessible through the following public transportation options:

- SEPTA elevated Market-Frankford and underground Broad-Ridge Spur lines have stops at 8th and Market;
- 14 SEPTA regional bus lines have stops within one block of 8th and Market;
- Greyhound and Megabus stations are located within two blocks of 8th and Market; these lines provide service to and from Philadelphia and: Baltimore, Boston, Buffalo, Hampton, VA, Harrisburg, NYC, Pittsburgh, Richmond, Syracuse, Toronto, Washington DC, Altoona, Doylestown, Easton, King of Prussia, Scranton, State College, Stroudsburg, Atlanta, Atlantic City, Charlotte, Columbus, Dayton, Indianapolis, Newark, Raleigh, St. Louis and Wilmington.
- All eight SEPTA Regional Rail lines run through the Market East Station, located at 11th and Market, two blocks away;
- New Jersey's high-speed PATCO line has its main stop at 8th and Market;

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- Amtrak is accessible at Philadelphia's 30th Street Station, through the SEPTA regional rail line available at the Market East Station, two blocks away from the site; and
- Amtrak has announced plans for a new high-speed rail line connecting New York City and Washington, D.C.; the Philadelphia station for this line will be located underground at 8th and Market and will make place New York City just 37 minutes away from this site.

In total, there are approximately 218 transit options by various modes of transportation (surface, subway and light rail) that are directly accessible from our proposed site or within a 1-minute walking radius.

SECTION 2

THE POTENTIAL FOR NEW JOB CREATION AND ECONOMIC DEVELOPMENT

&

SECTION 7

CREATION OF QUALITY LIVING WAGE JOBS AND PERMANENT JOBS FOR RESIDENTS OF THE COMMONWEALTH AND THE CITY OF PHILADELPHIA

Economic Impact

The positive economic impact of a gaming and entertainment venue on its surrounding area is more enhanced when a casino is part of the urban fabric – or downtown – of a city, rather than when it is located in other areas of that metropolitan region. MARKET8's location – in the heart of Philadelphia's urban core – will yield the greatest economic impact for the city and the Commonwealth.

Market East Associates, L.P. (MEA) engaged PKF Consulting, a nationally recognized gaming consultant, to prepare a Financial Analysis addressing the financial performance and competitive conditions of a gaming and entertainment venue at the 8th & Market site. A copy of PKF Consulting's report is attached to Appendix 40. In addition, MEA engaged Tourism Economics, a subsidiary of Oxford Economics Company, to measure the potential economic and fiscal impacts to the city, region, and state. A copy of Tourism Economics' report is attached to Appendix 34.

According to these consultants' reports, MARKET8 will have more than 4.7 million patrons in its first year of operation: 2.7 million patrons from the city, 1.35 million from the region, and 480,000 and 190,000 from the visitor and commuter workforce markets, respectively. This will result in \$666 million in on-going economic impact in the Commonwealth and includes \$404 million within the City of Philadelphia. The development of MARKET8 will generate nearly 5,300 one-time jobs in the Commonwealth and nearly 6,200 annual ongoing jobs

1. Annual State Economic and Tax Impacts

Overall, the Commonwealth's economic benefit derived from the MARKET8 project will be a combined \$909 million. This includes total annual economic generation of \$666 million combined with gaming income and sales tax revenues of \$243 million.

2. Development Expenditures and Associated Impact:

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Total development expenditures for this project will amount to approximately \$500 million and will generate \$583 million in direct, indirect and induced expenditures for the Commonwealth.

The 5,293 jobs created to develop this site will result in total salaries and wages totaling \$147 million in the Commonwealth. While these are one-time development/construction outlays, they represent significant positive impacts in terms of economic output, total jobs, and salaries and wages.

3. Annual Economic Impact

Annual impacts represent ongoing benefits in the local, regional, and statewide economies. The estimated impact of annual operating expenditures at MARKET8 will generate \$407 million in total economic activity in the Commonwealth of Pennsylvania. Ninety percent of all ongoing operational expenditures will occur in the Commonwealth of Pennsylvania, producing a direct impact of \$204 million. This total economic impact will include \$155 million in annual payroll (including benefits), supporting nearly 2,600 total jobs statewide.

4. Employment and Associated Impact of Patron Spending

Patron spending activity generated by MARKET8 will create 3,576 total jobs and produce an annual payroll (including benefits) of nearly \$73 million. Ninety percent of these jobs will originate from the Commonwealth of Pennsylvania.

5. Annual Ancillary Patron Spending and Associated Impact

Because of MARKET8's location – in the urban core of the city – casino patrons will have a wide variety of dining, tourism, shopping, and entertainment options within short walking distances from the gaming and entertainment center. Total ancillary spending by MARKET8 patrons will be \$118 million. This ancillary spending will generate a total economic impact of \$259 million in the Commonwealth, including \$74 million in annual payroll (including benefits), supporting nearly 3,600 jobs.

6. Tax Impacts Attributable to MARKET8

MARKET8 will generate \$225 million in gaming Tax Revenue. The Commonwealth will derive \$207 million in annual gaming tax revenue with an additional \$18 million being generated for the City of Philadelphia.

Pennsylvania and the City of Philadelphia will earn approximately \$13 million in one-time tax revenue and \$28 million in annual on-going tax revenues from income, sales and use taxes.

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7. Additional Economic and Fiscal Impacts Attributable to the Hotel Development and Operations

- Project costs of \$69.3 million
- One time economic impacts of \$120.8 million
- One time jobs impact of 1,098
- One time total non-gaming tax impact attributable to the hotel development of \$2.5 million
- Annual economic impacts of \$34.5 million
- Annual jobs impact of 98
- Annual non-gaming tax impact attributable to the hotel are \$2.5 million
- Annual incremental gaming tax impact of \$5.5 million

SECTION 3

**THE APPLICANT'S GOOD FAITH PLAN TO RECRUIT, TRAIN
AND UPGRADE DIVERSITY IN ALL EMPLOYMENT
CLASSIFICATIONS IN THE FACILITY**

&

SECTION 4

**GOOD FAITH PLAN FOR ENHANCING THE REPRESENTATION OF DIVERSE
GROUPS IN THE OPERATION OF ITS FACILITY THROUGH THE OWNERSHIP
AND OPERATION OF BUSINESS ENTERPRISES ASSOCIATED WITH OR
UTILIZED BY ITS FACILITY OR THROUGH THE PROVISION OF GOODS OR
SERVICES UTILIZED BY ITS FACILITY AND THROUGH THE PARTICIPATION IN
THE OWNERSHIP OF MARKET8**

&

SECTION 5

**THE APPLICANT'S GOOD FAITH EFFORT TO ASSURE THAT ALL PERSONS ARE
ACCORDED EQUALITY OF OPPORTUNITY IN EMPLOYMENT AND
CONTRACTING BY IT AND ANY CONTRACTORS, SUBCONTRACTORS,
ASSIGNEES, LESSEES, AGENTS, GAMING SERVICES PROVIDERS AND
SUPPLIERS IT MAY EMPLOY DIRECTLY OR INDIRECTLY**

The project ownership, casino management, and hotel management teams of MARKET8 are heavily comprised of minorities and minority-owned businesses, in addition to sharing a trenchant commitment to minority-hiring and the fostering of diversity.

The owners of MARKET8 acknowledge that implementation of diversity goals begins at the top of the organization.

For starters, Ken Goldenberg, president of The Goldenberg Group, developer of MARKET8, is himself an ex-civil rights attorney with an unwavering commitment to this ideal. His projects have always attained the highest minority-representation in the city, and more often than not, he co-ventures with local minority groups in his community development efforts. His company has spawned one of the more successful minority-owned real estate development companies in the city, Mosaic Development Partners.

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Moreover, MARKET8 will be developed with the clear understanding that one of the primary legislative intents of the Pennsylvania Racehorse Development and Gaming Act was to ensure that diversity is promoted in all aspects of gaming activities, including through the ownership of licensed casinos in Pennsylvania. Accordingly, an important attribute of MEA's ownership team is the significant inclusion of minority businessmen, entrepreneurs, and community leaders. Minorities currently comprise half of MEA's ownership team, including:

Willie Johnson, Founder and Chairman of PRWT Services, Inc.

Founded in 1988, PRWT Services, Inc. provides business process solutions services to state and local governments across the country. PRWT is one of America's largest minority-owned businesses and has been ranked in the top 100 by *Black Enterprise* magazine for the past nine years. The PRWT family of companies includes U.S. Facilities, Inc., a facilities maintenance and management company and Cherokee Pharmaceuticals LLC, the first minority-owned manufacturer of pharmaceutical products in the United States. Prior to founding PRWT, Willie F. Johnson was the owner and CEO of Fidelity Systems, Inc., a cable/line construction company. Previously, Mr. Johnson served in senior government management positions for more than 18 years. Among his public sector assignments, Mr. Johnson was the Regional Commissioner of the Office of Social Services for the Commonwealth of Pennsylvania (Southeastern Region), Director of the Youth Services Coordinating Office for the City of Philadelphia and Executive Director of the Philadelphia Office of Employment and Training. His board affiliations include Community College of Philadelphia, Cheyney University Foundation; Girard College; the African-American Chamber of Commerce; and *The Philadelphia Tribune*, the oldest minority-owned newspaper in the nation.

Mr. Johnson is a member of the Board of Trustees for his alma mater Allen University and was also a former board member for the Perkiomen School, the United Way of Southeastern Pennsylvania, and the Urban League of Philadelphia. Mr. Johnson has served as a member of the Executive committee of the Philadelphia Chamber of Commerce, the chair of the Transitional Work Corporation, and member for the Philadelphia Workforce Development Corporation Board.

A graduate of Allen University in Columbia, South Carolina with a Bachelor of Arts in Sociology, Mr. Johnson also holds a Master's Degree in Social Work from the University of Pennsylvania.

Bernard Smalley, Senior Counsel, Tucker Law Group

The Tucker Law Group is a boutique litigation firm in Philadelphia, PA and Miramar, FL. Prior to joining Tucker, Bernard Smalley practiced for more than 27 years with Anapol, Schwartz, Weiss, Cohen, Feldman & Smalley, P.C. in Philadelphia. Mr. Smalley was the Deputy Court Administrator for Civil Administration with the Philadelphia Court

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of Common Pleas, First Judicial District. He is a past President of the Philadelphia Trial Lawyers Association, the first African American to hold the position. He also serves as a member of the Pennsylvania Bar Associations' House of Delegates. Mr. Smalley is a member of the National Bar Association and the Barrister's Association and was previously a member of the Board of Governors of the Philadelphia Bar Association. He sat as the Chair of Hearing Committee 1.14 for the Supreme Court of Pennsylvania Disciplinary Board and was a standing member of the Pennsylvania Supreme Court's Evidence Committee.

In 2003, Mr. Smalley was inducted as a Fellow in the International Academy of Trial Lawyers. He is a Fellow of the American College of Trial Lawyers. In October of 2011, Mr. Smalley received the NAACP Philadelphia Chapter's Cecil B. Moore Award. He serves on a number of Boards, including the Widener University School of Law Board of Overseers, the Board of City Trusts where he has a lifetime appointment and Chairs the Girard College Committee, The Urban Affairs Coalition, The Ellis Trust and the Board of the Zoological Society of Philadelphia. He was Chairman of the Wynnefield- Overbrook Community Development Corporation.

Mr. Smalley received his undergraduate degree from Temple University and obtained his J.D. from Widener University School of Law.

Dennis Cook, Founder, WES Health Centers

Dennis Cook started his career in the Advance Management Training program at AT&T. After receiving a graduate degree in Public Administration from the Kennedy School of Government at Harvard University, he was appointed the youngest Deputy Commissioner of Finance for one of the largest government agencies in New York City, under the newly elected Mayor, David Dinkins. Two years later, Mr. Cook was promoted to the Chief Financial Officer position of The New York City Health and Hospitals Corporation. Upon leaving municipal government, Mr. Cook established a consulting firm to leverage his knowledge and experience in business, government, and finance. In addition to his consulting practice, he was recruited to save the financially strapped WES Health Centers in Philadelphia. After more than 15 years, WES has grown into one of the largest African American managed health agencies in the country with operations in five states. Mr. Cook continues to provide consulting services to the business, government and financial industries.

William R. Miller, IV, Chief Executive Officer, Ross Associates

William R. Miller, IV, is a leading communications strategist in the areas of public affairs, policy development, media relations and organizational change. He founded Ross Associates, Inc. in December 1981, parlaying his 20 years of municipal government

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experience and his understanding of government's effect on the business environment into a successful business enterprise. He has worked with clients in the corporate, government and non-profit sectors.

Mr. Miller's extensive community service includes appointments to the Philadelphia Tax Reform Commission, the Delaware River Waterfront Corporation, the Board of Trustees of the Free Library of Philadelphia the Comcast Corporation's Community Advisory Board, and the Board of Directors of Allion Healthcare, Inc. He is a member of the Sunday Breakfast Club, and a founding member of the African American Chamber of Commerce of PA, NJ and DE and of The Forum. He is a lifetime member of Kappa Alpha Psi Fraternity, the Campbell Washington Joppa Masonic Lodge, and Enon Tabernacle Baptist Church.

Mary V. Lawton, Chief Executive Officer of M. Lawton Associates

M. Lawton Associates is a family-owned and operated business that provides financial management services. Mary V. Lawton received her bachelor of science in business administration from La Salle University. In addition to being an astute businesswoman and entrepreneur, Ms. Lawton is involved in many civic and community activities. She serves as a Board Member for the Germantown Housing Development Corporation, the National Association of Accountants, and the Pennsylvania Association of Public Accountants. She also volunteers for Junior Achievement of Philadelphia and for the Greater Philadelphia Mentoring Partnership.

Cheryl McKissack, President & Chief Executive Officer, McKissack & McKissack

Cheryl McKissack has more than 20 years of experience in all phases of the construction industry, including major project work in the commercial, healthcare, education and transportation sectors. She represents the fifth generation of the McKissack family's century old business, McKissack & McKissack, the oldest minority and woman-owned professional design and construction firm in the nation.

As President and CEO, Ms. McKissack serves as Project Executive on all of the firm's high profile projects. In this capacity, she provides executive leadership and ensures that diversity is implemented during each phase of a project or program. Her skills include expertise in estimating, scheduling, design review, document control, construction inspection, and developing and implementing quality assurance/ quality control programs.

Over the years, Ms. McKissack has built upon the success of her firm's fore parents by fostering long-lasting relationships and by providing innovative solutions to complex projects.

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Ms. McKissack holds M.S. and B.S. degrees in Civil Engineering from Howard University.

Further, the casino at MARKET8 itself will be managed by minority-owned businesses, Mohegan Gaming Advisors ("MGA") and Mohegan Tribal Gaming Authority ("MTGA"), both of which are owned by the Mohegan Tribe of Indians of Connecticut. It too is committed to achieving diversity in all aspects of its operation – and has developed a Diversity Plan to ensure that all persons are accorded equal opportunity in employment and contracting. A copy of that Diversity plan is attached to this application.

MGA is also committed to hiring and promoting the most qualified persons for all available positions at the MARKET8 casino. All applicants and employees will be provided with equal opportunity in recruitment, selection, appointment, promotion, training, delegation, discipline and separation. And it is committed to the highest and best practices of ensuring diversity in the procurement of goods and services for this project.

Historically, MGA has demonstrated its commitment to equal hiring practices at its Connecticut and Pennsylvania properties. Since taking over the Pocono Downs property, MGA has been able to elevate the minority representation from 1.5% at date of purchase on 1/25/2005 to 11.2% as of 1/1/2013. Moreover, in the management and supervisory capacity, Mohegan Sun at Pocono Downs ("MSPD") reports a 13.4% minority representation in its workforce. MSPD team members currently serve on the board of the Diversity Institute at Misericordia University, the Northeastern Pennsylvania Diversity Education Consortium, and the Diversity Committee of the Greater Wilkes-Barre Chamber of Commerce. In addition, MSPD is a lifetime member of the NAACP based on its ongoing commitment and contributions. MSPD has held two major career fairs open to the public in which job seekers were assisted with their applications and also maintains a Human Resource office that is open to the public, where anyone can receive guidance on the application process, open positions, and interview process.

Currently, 99.6% of the MSPD workforce is comprised of Pennsylvania residents. In its short existence of 6.5 years, MSPD has promoted over 600 team members into new positions and over 90% of supervisory/management positions have been filled by internal team members. MSPD works with local schools and colleges to provide opportunity in a number of ways:

- Internship opportunities for students
- Co-op hires for local vocational schools
- Career fairs at local colleges
- Career shadowing opportunities
- Interview practice and feedback

Likewise, working with community groups and city and state officials, MARKET8 will conduct outreach programs that will help local residents identify and train for positions at its venue;

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including hospitality, foodservice, gaming, management and more. Job and Opportunity Fairs, training sessions, and online resources will help connect Pennsylvania workers with new jobs created by our project.

MARKET8 will utilize the Pennsylvania Gaming Control Board's list of minority and women-owned businesses to ensure that it procures goods and services from a number of qualified companies that are owned by women and ethnic minorities. Furthermore, where possible, MARKET8 will publish requests for proposals for both the construction and operational contracts of the facility in order to receive a more robust range of bids that will allow for the inclusion of MBEs/WBEs/DBEs. Such efforts will allow both large and small companies to have an equal opportunity to participate in the contracts offered by MARKET8.

Finally, the hotel at MARKET8 will be owned, financed, and managed by a minority-owned company, Hersha Hospitality Management. Co-founded in 1985 by Hasu P. Shah and Hersha Shah, it is today managed by their sons, Neil Shah and Jay Shah. Together, Hersha shares the same commitment for minority hiring and diversity as the ownership team, the development team, and the casino management team.

MARKET8 is not only about Philadelphia, but it's about diversity.

SECTION 6

HISTORY AND SUCCESS IN DEVELOPING TOURISM FACILITIES ANCILLARY TO GAMING DEVELOPMENT

Given 8th & Market's location at the center of Philadelphia's most significant historic, convention, and tourism district, proven success in developing tourism facilities was an essential consideration in assembling a qualified ownership, development, and management team.

The leadership group of MARKET8 – including individual investors and the Operator, Mohegan Gaming Advisors (“MGA”) – has extensive experience and history in developing multi-faceted destinations that support and promote tourism in their respective communities.

Mohegan Tribal Gaming Authority (“MTGA”) is a national leader in the development and management of destination creation; critical to this success is their ability to create and market facilities and amenities that attract, promote and retain tourism. All Mohegan Sun properties feature multiple entertainment offerings: from gaming to dining to live entertainment. Understanding that the success of the tourism industry is a critical part of the overall regional economy and lifestyle, MTGA has developed a strategy to work closely with local tourism agencies to market their facility as a magnet that draws to and supports the entire area.

Through joint ventures and other innovative partnerships and promotions, MTGA collaborates with local communities to ensure that the region is an attractive destination for business and leisure travelers.

For example, since opening in 1996, MTGA has held a leadership role in the business and tourism communities of Southeastern Connecticut. MTGA is committed to helping the Southeastern Connecticut region, branded Mystic Country, in as many ways as possible. Working with the State's Commission on Culture & Tourism, the Eastern Regional Tourism District, and the Mystic Coast & Country Travel & Tourism Association, Mohegan Sun has made a direct impact on increasing Mystic Country awareness and driving traffic to regional tourism businesses.

MTGA's efforts to support and promote tourism locally have been recognized throughout Connecticut:

- George Galinsky, Vice President of Mohegan Sun, recently won “Volunteer of the Year” for his efforts to promote tourism in the area as a board member of Mystic Coast and Country.
- Mohegan Sun President and Chief Executive Officer Mitchell Etes was a 2007 nominee for Mystic Coast & Country's Travel Industry Association's Golden Pineapple Award, which honors those who have contributed to the tourism industry.

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Additionally, in an effort to drive incremental visitation to the region through conventions, meetings, group tours and leisure travel, MTGA utilizes a comprehensive network of established industry and business contacts. Mohegan Sun has an experienced team of sales and convention services managers that in the past year have secured 52,000 group rooms dedicated solely to corporate and association customers from all across the country.

MTGA is an active participant in the following organizations' monthly trade shows and conventions that help drive new business to destination resorts:

- Meeting Professionals International – premier global association community for meeting and event professionals
- Associated Luxury Hotels International – provider of meeting planning resources with access to exclusive meeting values from our members
- Preferred Hotel Group – Hotel reservation service reserved for four-star hotels
- Krisam Group – National Sales Office for hotel and resort meeting site selection

Currently, MTGA is a member of the two largest associations for group tours including the American Bus Association and the National Tour Association. Mohegan Sun participates in the organizations' annual conventions to connect with tour operators who coordinate discount packages on lodging, transportation, regional coupon books and stops at attractions throughout Southeastern Connecticut.

In addition to MTGA's membership in tour association groups, they also are active members of the following regional tourism industry organizations including:

- Greater Mystic Visitors Bureau
- Eastern Connecticut Chamber of Commerce
- Connecticut Convention and Sports Bureau
- Greater Boston Convention and Visitors Bureau

MTGA also works with third party convention and business travel companies such as Conference Direct, Experient and Helms Brisco that provide their clients with complete conference packages. MTGA utilizes these relationships to bring groups to the area.

With regards to individual investors, Ira M. Lubert and Michael J. Heller, two owners of Market East Associates, L.P., have proven track records in creating tourism facilities ancillary to

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gaming. Messrs. Lubert and Heller are owners of Valley Forge Casino Resort ("VFCR"), the Commonwealth's first resort casino.

VFCR is an approximately 850,000 square foot facility and includes two (2) large hotels and approximately 100,000 square feet of convention and meeting space. Included within VFCR are numerous non-gaming amenities, such as seven (7) restaurants, a nightclub, the Waterford Ballroom, two (2) gift shops, an outdoor pool, and a fitness center and spa. Prior to the March 31, 2012, opening of VFCR's casino, significant upgrades were made to the resort's non-gaming amenities, including its restaurants and nightclub. Messrs. Lubert and Heller have been intimately involved in the design, construction, opening and management of VFCR. Under their leadership, VFCR has become a true "Resort Casino" with a wide array of offerings for day-trippers and overnight guests. Since the casino's opening, VFCR continues to be a popular venue for weddings, parties, conventions, business conferences, concerts and other entertainment events. Messrs. Lubert and Heller will bring their experience to the design, development and management of MARKET8, which will have a full complement of non-gaming offerings.

David Adelman and The Goldenberg Group have also worked on a number of hospitality projects. Adelman recently completed an extended-stay hotel in West Philadelphia, and The Goldenberg Group is currently pursuing the development of a 5-star hotel in one of Philadelphia's premier historic buildings.

Finally, Hersha Hospitality Management, which currently manages Philadelphia's only aspiring 6-star hotel, The Rittenhouse, is one of the country's leaders in the hospitality wing of the tourism industry. And as Philadelphians, Neil Shah and Jay Shah, respectively the president and the chief executive officer of HHM, bring considerable understanding and insight to capitalizing on Philadelphia's tourism attractions.

SECTION 8

THE RECORD OF THE APPLICANT AND ITS DEVELOPER IN MEETING COMMITMENTS TO LOCAL AGENCIES, COMMUNITY-BASED ORGANIZATIONS AND EMPLOYEES IN OTHER LOCATIONS

The ownership group and developers of Market East Associates, L.P. ("MEA"), has consistently demonstrated a commitment to local agencies and community development through its numerous projects and initiatives. All have demonstrably high standards for supporting minority-owned business enterprises and responsible development. Through volunteerism, board appointments, civic engagements, personal philanthropic endeavors, and other community outreach initiatives, the MARKET8 team has an enviable record of benefiting Philadelphia and the Commonwealth.

The developer, The Goldenberg Group, has worked to make positive contributions to the communities in which it operates, in Philadelphia and across the globe. The Goldenberg Group was founded as a financial platform to provide resources for the public interest and charitable work of its founder, Ken Goldenberg. Through its charitable arm, People Helping People, The Goldenberg Group insists on engaging with and supporting community-based organizations not only in the areas in which they do development, but also in any community where they can have an impact, including communities in Kenya and the Ivory Coast.

Since 2007, every month, Goldenberg employees participate in volunteer projects that include a variety of activities to support people of all ages. Past projects include:

- Preparing meals for the homebound at Aid for Friends;
- Baking for the patients and their loved ones at The Ronald McDonald House;
- Collecting, delivering and organizing clothes and toys at Cradles to Crayons;
- Producing a Halloween party for the children of the Penrose Recreation Center;
- Building a little league baseball field in the underserved community of Strawberry Mansion;
- Delivering gifts and singing with the elderly at Manor Care nursing home;
- Distributing hundreds of Thanksgiving baskets to families who would otherwise be unable to afford a Thanksgiving celebration.

Through its Adopt-A-School program, The Goldenberg Group partnered with E.M. Stanton Elementary School, a School District of Philadelphia non-charter school. Through their partnership, The Goldenberg Group and People Helping People have worked with Stanton leadership, parents and neighbors to organize volunteer projects (including over 350 hours of

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service to paint the school), raise funds to help the school enhance its programs and facility, and provide ongoing help with advocacy and outside fundraising.

In West Philadelphia, The Goldenberg Group, along with its partner, West Philadelphia Financial Services Institution, organize and sponsor an annual Renaissance Festival that attracts thousands of local residents for entertainment, health screenings and community awards.

The Goldenberg Group has a demonstrated track record in satisfying and exceeding Equal Opportunity Plan (EOP) goals on its projects.

The Goldenberg Group partnered with West Philadelphia Financial Services Institution ("WPFSI") to develop ParkWest Town Center in West Philadelphia, 343,000 square foot retail center on 29 acres. WPFSI holds a 30% interest in the project. ParkWest is the first project of its kind in an urban setting, and was heralded by the Obama Administration and the Food Bank as the model of how public/private partnership should work. The project achieved a 43% Minority-/Women-owned Business Enterprise.

The Goldenberg Group has just started construction on a \$100 million, 14-story, 800-bed student housing project adjacent to Temple's campus in North Philadelphia. It is on track to meet all MBE/WBE goals for the project – 38% Minority owned Business Enterprise and 7% Women owned Business Enterprise. Goldenberg's 25% community partner on this project is the Bridge of Hope CDC and the Bright Hope Baptist Church.

Community support and engagement is equally important to MTGA and they have established a strong reputation for being a good neighbor that supports hundreds of organizations and nonprofits throughout Connecticut, including:

- American Red Cross
- Connecticut Special Olympics
- Boys Scouts of America – Connecticut River Council
- Girls Scouts of Connecticut
- Connecticut Food Bank
- YMCA of Greater Springfield
- Women's Center of Southeastern Connecticut
- CT Sports Foundation for Cancer
- Lawrence & Memorial Hospital
- Backus Hospital
- Eastern CT Chamber of Commerce
- Albano Ballet
- Muscular Dystrophy
- Mystic Seaport
- Goodspeed Opera House

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- Make-A-Wish Foundation
- Basketball Hall of Fame
- Governor's New Tourism Initiatives
- Eugene O'Neill Theater
- The Bushnell Theater
- Town of Montville – Graduating Seniors
- SEAT Bus

MTGA's commitment to community is strong in Pennsylvania as well and their support of their Pocono Downs neighbors includes employee volunteerism as well as financial support. The local organizations they support regularly includes:

- 1st Lt JF Deprimo Memorial Fund
- All Saints Academy PTO
- Allentown Public Library
- Alzheimer's Association
- American Legion
- American Lung Association
- American Red Cross Blood Drive
- American Red Cross-Lackawanna
- Autism Awareness
- Benefit For Peggy Dorang
- Big Brothers Big Sisters
- Bloomsburg Hospital
- Bloomsburg Hospital Wine Tasting Benefit
- Breathe Deep NEPA
- Cancer Society
- Candy's Place
- Catherine Mcauley Center
- Catholic Youth Center
- Catholic Youth Services
- Children's Advocacy Center-NEPA
- Clem-Mar House
- Clifton R. Lewis Good Life Foundation
- Dress For Success Lackawanna
- F.M. Kirby Center
- Fine Arts Fiesta
- Friendly Sons Of St. Patrick
- Geisinger Health System Foundation
- Greater Pittston YMCA
- Habitat For Humanity-Wyoming Valley

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- Institute For Public Policy
- Irem Shrine Circus
- Jewish Community Center of Jewish Family Service
- Joann Cross/Bill Kelly Benefit
- Johnson College
- Keystone Chapter-Unico National
- King's College
- Kiss Theater
- Kiwanis Of Scranton
- Lake Silkworth Lions Club
- Lasalle Academy
- Leadership Wilkes-Barre
- Lupus PA, Ne Branch
- Luzerne City Historical Society
- Marley's Mission
- Marywood University
- Meals On Wheels Of NEPA
- Minooka Lions Club
- Misericordia Natl. Library Week
- Monroe County Historical Association
- Muscular Dystrophy Association
- NEPA Boy Scouts Of America
- Northeastern PA Philharmonic
- Price Chopper - Live With Autism
- PSU WB Survey Society
- Rolling Angels For Armed Forces
- Salvation Army-West Pittston
- Scranton Chamber, Greater
- Sector One, LLC - Soldier's Angels
- Serving Seniors, Inc.
- Society Of Irish Women
- St Patrick's Parade Association
- St. Joseph Mareello Parish Penny Auction
- St. Nicholas Church Ham Bingo
- St. Peter's Lutheran Church
- Team RWB
- Temple Israel
- The Ice Rink At Coal Street
- The Renal Race
- The Scranton Plan
- Timmy's Town Center
- United Cerebral Palsy

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- United Neighborhood Centers
- United Way Contribution
- VFW Post 3448 Ladies Auxiliary
- Victory Sports
- Wilkes-Barre NAACP
- WVIA Travel Auction
- Wyoming Area Catholic School
- Wyoming Seminary
- Wyoming Valley Alcohol & Drug
- Wyoming Valley All Star Game
- YMCA

SECTION 9

**THE DEGREE TO WHICH POTENTIAL ADVERSE EFFECTS WHICH MIGHT
RESULT FROM THE PROJECT, INCLUDING COSTS OF MEETING THE
INCREASED DEMAND FOR PUBLIC HEALTH CARE, CHILD CARE, PUBLIC
TRANSPORTATION, AFFORDABLE HOUSING AND SOCIAL SERVICES,
WILL BE MITIGATED.**

In his report entitled "The Economic & Fiscal Impacts of MARKET8 at 8th & Market Streets", Mr. Michael Mariano, Senior Economist with Tourism Economics and Oxford Economics provides an analysis regarding the potential social impact of the proposed MARKET8. A copy of Mr. Mariano's report is attached as Exhibit "A" to Appendix 34. Mr. Mariano offers the opinion that "it is not anticipated that MARKET8 will cause an increased demand for public health care, child care, public transportation, affordable housing or social services." In addition, Mr. Mariano opines that, because of the proposed location of MARKET8 in the middle of an already well-established commercial, retail, convention, and historic district, it will have limited impact on the neighboring communities.

Upon the request of Market East Associates, L.P., Pennoni Associates, Inc. conducted a comprehensive Traffic Impact Study for the proposed site of MARKET8. A copy of Pennoni Associates' Traffic Impact Study is attached as Exhibit "D" to Appendix 34. Pennoni's analysis found that MARKET8 is in a prime location to access several modes of transit. In fact, Pennoni described the transit service in 8th and Market location as "extraordinary." There is no indication that MARKET8 will have any material adverse effects on the public transportation systems in the area.

The City of Philadelphia and the Philadelphia School District would see increased tax revenues directly from gaming revenues and from increases in existing local tax bases. Mr. Mariano estimates that MARKET8 will generate over \$17 million in local gaming tax revenues (expressed in 2016 dollars) in its first year of operations. Moreover, MARKET8's development/construction activities will generate a total one-time impact of more \$0.43 million in city sales tax and \$3.46 million in city wage tax revenues. On an annual basis, Mr. Mariano estimates that the City will enjoy \$3.89 million in sales tax and \$5.66 million in wage tax revenues generated by MARKET8. With these additional tax revenues, city officials will be able to address any costs relating to an increase demand for government services.

SECTION 10:

THE RECORD OF APPLICANT AND ITS DEVELOPER REGARDING COMPLIANCE WITH (I) FEDERAL, STATE AND LOCAL DISCRIMINATION, WAGE AND HOUR, DISABILITY AND OCCUPATIONAL AND ENVIRONMENTAL HEALTH AND SAFETY LAWS AS WELL AS (II) STATE AND LOCAL LABOR RELATIONS AND EMPLOYMENT LAWS; (III) THE APPLICANT'S RECORD IN DEALING WITH ITS EMPLOYEES AND THEIR REPRESENTATIVES AT OTHER LOCATIONS.

The Goldenberg Group and Owner/President Ken Goldenberg have an outstanding record of compliance with State and Local Discrimination, Wage and Hour, Disability, Occupational and Environmental Health and Safety Laws as well as State and Local Labor Relations and Employment Laws.

MTGA has a very strong track record in employee relations. This is clearly evident by their operation of Mohegan Sun at Pocono Downs ("MSPD") in Luzerne County. Here are some employment relations highlights for MSPD:

- Zero violations on an Employment Law level.
- In the seven EEOC/PHRC cases that have been filed, all have been dismissed except for one that was settled for \$500.00.
- In an independent Employee Opinion Survey conducted by Sterling Research, Mohegan Sun at Pocono Downs received an overwhelming 94.1% of all team members stating that they enjoy their job at MSPD, 90% stating that they would Recommend MSPD as a Great Place to Work, and 90% stating that they were Proud to Work at MSPD.
- MSPD has an Employee Relations Manager committed to meeting with team members and resolving all issues on a 24/7/365 basis.
- MSPD has a great working relationship with the two collective bargaining agencies that are on property, Teamsters and Operating Engineers.
- Turnover at MSPD is much lower in comparison to other companies in the same industry.
- MSPD is committed to its team members and has a policy specifically in place to ensure Fair and Equitable Treatment, including a Board of Review process. This internal process was developed to allow team members the opportunity to resolve differences between themselves and their supervisors.

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**SUMMARY OF ALL PERSONS WHO HOLD AN OWNERSHIP OR OTHER
BENEFICIAL INTEREST IN THE APPLICANT, OR IN ANY OF ITS PRINCIPAL
AFFILIATES OR ENTITIES REQUIRED TO BE LICENSED**

See attached

Associates, LP

Ownership Interest %

Owners

Market East Associates, LP

1.0000%	Market East GP, LLC
20.0000%	Kenneth N. Goldenberg
2.2667%	Market East GG Investors, L.P.
21.1333%	Ira Lubert
0.2833%	Michael Heller
0.5667%	Inner-City Gaming, LLC
7.5167%	David Adelman
0.5667%	William Landman
40.0000%	MainLine MEA Partners, L.P.
6.6667%	Mohegan Gaming

Market East GP LLC

40.0000%	Market East GG Investors, L.P.
20.0000%	Ira Lubert
5.0000%	Michael Heller
10.0000%	Inner-City Gaming, LLC
15.0000%	David Adelman
10.0000%	William Landman

Market East GG Investors LP

1.0000%	Kenneth N. Goldenberg, General Partner
98.9000%	Kenneth N. Goldenberg, Limited Partner
0.1000%	Anita B. Goldenberg, Limited Partner

Inner City Gaming LLC

22.6500%	Willie F. Johnson, President and Member
11.3250%	Bernard W. Smalley, Sr., Secretary and Member
25.0000%	Dennis E. Cook, Treasurer and Member
9.9000%	Mary V. Lawton, Member
9.9000%	William R. Miller IV, Member
9.9000%	Thomas A. Leonard, Member
11.3250%	Cheryl McKissack, Member

Net Ownership Interest in Market East Associates, LP

LP(KNG)	20.00%	LP	0.1284%
LP(MEGG)	2.2644%	GP	0.0227%
GP	0.3998%	Total	0.1510%
Total	22.6640% Kenneth N. Goldenberg	Total	0.1510% Willie F. Johnson
LP	0.0023%	LP	0.0642%
GP	0.0004%	GP	0.0113%
Total	0.0027% Anita B. Goldenberg	Total	0.0755% Bernard Smalley, Sr.
LP	21.1333%	LP	0.1417%
GP	0.2000%	GP	0.0250%
Total	21.3333% Ira Lubert	Total	0.1667% Dennis E. Cook
LP	0.2833%	LP	0.0561%
GP	0.0500%	GP	0.0099%
Total	0.3333% Michael Heller	Total	0.0660% Mary V. Lawton
LP	7.5167%	LP	0.0561%
GP	0.1500%	GP	0.0099%
Total	7.6667% David Adelman	Total	0.0660% William R. Miller
LP	0.5667%	LP	0.0561%
GP	0.1000%	GP	0.0099%
Total	0.6667% William Landman	Total	0.0660% Thomas A. Leonard
LP	40.0000%	LP	0.0642%
GP		GP	0.0113%
Total	40.0000% MainLine MEA Partners, L.P.	Total	0.0755% Cheryl McKissack
LP	6.6667%		
GP			
Total	6.6667% MGA Holding PA, LLC		