

APPENDIX 36

PROVIDE DETAILS OF A COMPULSIVE OR PROBLEM GAMBLING PLAN.

See Attached

11/15/2012

Stadium Casino, LLP

COMPULSIVE AND PROBLEM GAMBLING PLAN

11/15/2012

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POLICY # 1.0 - Goals of Stadium Casino, LLP Compulsive and Problem Gambling Plan and procedures and timetables to implement the plan

Stadium Casino has developed, and will maintain, amend and adjust as necessary, the goals, procedures and timetables of this CPG Plan as outlined below. The procedures set forth in this CPG Plan and its exhibits will be followed by the designated employees. The Compulsive and Problem Gambling Plan will be implemented upon approval of the CPG Plan by the Pennsylvania Gaming Control Board ("PGCB").

All employees of Stadium Casino are expected to be knowledgeable of, and follow approved procedures consistent with, this CPG Plan. As part of their new employee orientation and annually as reinforcement training, all employees will receive training on the scope, practice and procedures of this CPG Plan as well as training on the CPG Plan itself.

Stadium Casino will:

1. Educate all employees on responsible gaming.
2. Educate all employees on how to recognize some signs of compulsive and problem gambling.
3. Educate all employees on the social and economic costs of compulsive and problem gambling.
4. Educate all employees regarding the relationship between compulsive and problem gambling and other addictive behaviors.
5. Educate all employees on where to locate and how to provide compulsive and problem gambling literature to patrons seeking such information.
6. Educate all employees on the process of reaching out to a patron suspected of compulsive and problem gambling and deliver problem-gambling literature on voluntary treatment services.
7. Make publicly available to patrons brochures and other literature describing responsible gaming, explaining characteristics of compulsive and problem gambling, and where to find professional assistance and/or treatment.
8. Prevent underage gambling.
9. Prevent gambling by intoxicated patrons.
10. Conspicuously place signage bearing the toll-free helpline number for the Compulsive Gamblers hotline as specified in the section titled *Plans for posting signs* and as provided in Exhibit A.
11. Serve alcoholic beverages responsibly.
12. Advertise responsibly and to avoid using individuals who appear to be under 21 years of age in advertisements.
13. Educate all employees regarding self-exclusion including where to direct a patron who requests to be self-excluded.
14. Establish effective procedures to ensure that all aspects of section 1516 of the act (concerning self-exclusion) are complied with.
15. Mandate attendance at employee orientation and mandate attendance at annual 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. Departmental specific training is conducted by Department Directors.

POLICY # 2.0 - The Responsible Gaming Committee is responsible for the implementation and maintenance of the plan

The Responsible Gaming Committee is charged with reviewing the CPG Plan and ensuring its effective implementation during day-to-day operations of the facility. The Responsible Gaming Committee shall monitor, adjust, and respond to concerns involving the maintenance of the Compulsive and Problem Gambling Plan and ensure meaningful compliance therewith. The Responsible Gaming Committee will also review the Responsible Gaming Log not less frequently than once each calendar quarter at the Responsible Gaming Committee meetings. The Director of Security will also review the Responsible Gaming Log weekly to identify apparent trends or issues and will bring those matters to the attention of the General Counsel for action. The members of the Responsible Gaming Committee are the Director of Security, Director of Diversity, Player Services Manager, Human Resources Director and General Counsel. The Director of Internal Audit will attend committee meetings as requested. The Director of Security is the person responsible for liaison with PGCB on matters related to implementation and maintenance of the CPG Plan.

POLICY # 3.0 - Commitment to train employees and annual reinforcement training

Stadium Casino 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 Stadium Casino will be trained in accordance with the employee training program (Exhibit B). Appropriate employees, as specified herein, will be trained in the TIPS (Exhibit C). Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan. The training program includes training 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, 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 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 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. Employees in the Security (security officers and shift managers), Food & Beverage (food servers and beverage servers and their managers), Player Services Departments (player services representatives and their shift managers) and Table Games Department (dealers and their supervisors) will be trained in TIPS (Exhibit C).

POLICY # 4.0 - Duties and Responsibilities of Employees Designated to Implement or Participate in the 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 Stadium Casino 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 Responsible Gaming Committee shall engage, on a contractual basis, 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.

3. The Responsible Gaming Committee shall engage, on a contractual basis, a person or business with specialized knowledge, skill, training and experience in responsible gaming to create, provide and/or review the literature/brochure content.
4. The Responsible Gaming 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. Procedures for the Security Department are set forth in this plan.
 - 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 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. **Player Services Department** - Player Services 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. Player services representatives 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.
 - d. **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.
 - e. **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 the ACSC system, and the Stadium Casino, within 3 business days of Stadium Casino's receipt of the lists from the PGCB. Procedures for Marketing are set forth in this plan.
 - f. **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.

- g. **Valet Department** - Valet is responsible for preventing intoxicated patrons from obtaining a valet parked car to leave the facility.
- h. **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.
- i. **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.

POLICY # 5.0 - The Responsibility of Patrons with Respect to Responsible Gambling

1. Stadium Casino utilizes a brochure, which provides patron responsibilities regarding responsible gambling (Exhibit D).
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.
3. All brochures and related material are available at various locations throughout the facility, which are later identified in this Plan. Specifically, Exhibit F, Exhibit G and Exhibit M are displayed at various locations throughout the facility as identified later in this Plan. The remaining brochures and related materials are available at the same locations upon the request of a patron or for management to provide to any patron suspected of compulsive and problem gambling.

POLICY # 6.0 - Procedures to Identify Patrons and Employees with Suspected or Known Compulsive and Problem Gambling Behavior

Stadium Casino 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 (Exhibit B). 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.

POLICY # 7.0 - Procedures for employees to report suspected or identified compulsive or problem gamblers to a designated key employee or other supervisory employee

Stadium Casino 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 (Exhibit E).

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 manager immediately with specific concerns regarding the behavior exhibited or oral statements made. The report of concern to the manager 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:
 - a. Am I concerned?
 - b. Are there security or service issues involved?
 - c. Is my concern based on statements?
 - d. How quickly should I report my concern?
4. Managers shall follow the steps below or contact the Security Shift Manager.
5. The Security Shift Manager will evaluate the facts and circumstances presented and make a determination if the patron should be approached. If an approach is warranted, the Security

Shift Manager shall casually approach the patron to assess the situation. If possible, inquire about the day, the weather or other "small talk." If the person seems receptive, attempt to suStadium Casinost a conversation in a private setting. Express concern and offer alternatives for assistance such as written materials explaining self-exclusion, problem gambling brochures and problem gambling treatment and assistance resources (Exhibits G, I, J, K and L) as set forth in the next section titled *Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior*. Always protect privacy of the patron.

6. If the person is not receptive, walk away.
7. If the Security Shift Manager is not comfortable approaching a patron or is uncertain whether the situation warrants patron contact, he/she should contact the General Manager who will follow the procedures set forth above.
8. The Security Shift Manager will ensure that all known information about the patron and incident is entered into the Responsible Gaming Log located in the Security Shift Manager Office by either the officer on duty in the security command center or by the shift manager himself or herself. This Log is electronic and is part of the incident reporting system at Stadium Casino's licensed facility.

POLICY # 8.0 - Procedures for providing information to individuals with suspected or known compulsive and problem gambling behavior

Stadium Casino will make available to all patrons printed material to inform patrons about compulsive and problem gambling, responsible gaming, the self-exclusion program, voluntary credit suspension program and treatment options (Exhibits G, I, J, K, L, M and T).

1. Stadium Casino will post signage within 50 feet of each entrance and exit of the facility and on each ATM, cash dispensing and change machine within the facility as set forth in the section titled *Plans for posting signs* and as provided in Exhibit A.
2. Stadium Casino will make available upon request the following information at each Security Command Center, Player Services Desk, Credit Desk and Cashier Cage:
 - a. Responsible Gaming brochure (Exhibit D)
 - b. Request for Voluntary Self-Exclusion form (Exhibit E)
 - c. Voluntary Credit Suspension brochure (Exhibit M)
 - d. Self-Exclusion Program brochure (Exhibit F)
 - e. Compulsive and Problem Gambling brochure (Exhibit G)
 - f. Treatment provider list (Exhibit H)
 - g. Gamblers Anonymous Pennsylvania Directory (Exhibit I)
 - h. GAM-ANON Pennsylvania Directory (Exhibit J)
3. Additionally, Exhibit F, Exhibit G and Exhibit M will be displayed at each Player Services Desk, Credit Desk and Cashier Cage.
4. All employees will be familiar with the location of the information and will be able to direct patrons to the information.

5. The 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.*
6. On the backside of all Player Cards and on the backside of all ticket vouchers, Stadium Casino will print the phrase "Gambling Problem? Call 1-800-GAMBLER".

POLICY # 9.0 - Procedures for responding to patron requests for information

Stadium Casino 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.

1. Stadium Casino will make available upon request the following information at each Security Command Center, Player Services Desk, Credit Desk and each Cashier Cage:
 - a. Responsible Gaming brochure (Exhibit D)
 - b. Request for Voluntary Self-Exclusion form (Exhibit E)
 - c. Voluntary Credit Suspension Brochure (Exhibit M)
 - d. Self-Exclusion Program brochure (Exhibit F)
 - e. Compulsive and Problem Gambling brochure (Exhibit G)
 - f. Treatment provider list (Exhibit H)
 - g. Gamblers Anonymous Pennsylvania Directory (Exhibit I)
 - h. GAM-ANON Pennsylvania Directory (Exhibit J)
2. All employees will be familiar with the location of the information and will be able to direct patrons to the information.
3. Additionally, Exhibit F, Exhibit G and Exhibit M will be displayed at each Player Services Desk, Credit Desk and Cashier Cage.
4. 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"
5. Requests for information should never be entered into the player tracking system.

POLICY # 10.0 - 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.

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 manager or with the Security Shift Manager, however the identity should never be discussed or disclosed to any other employee of Stadium Casino 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.

POLICY # 11.0 - Provision of printed material to educate patrons about compulsive and problem gambling and to inform them about treatment services available

Stadium Casino 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 (Exhibits G, H, I, J, K, L, M and T) and will review and update the printed materials as necessary.

1. Stadium Casino will post signage as set forth in the section titled *Plans for posting sign* and as provided in Exhibit A.
2. Stadium Casino will make available upon request the following information at each at each Security Command Center, Player Services Desk, Credit Desk and each Cashier Cage: Exhibits D, E, F, G, H, I, J and M.
3. Additionally, Exhibit F, Exhibit G and Exhibit M will be displayed at each Player Services Desk, Credit Desk and Cashier Cage.
4. On the backside of all Player Cards, on the backside of all ticket vouchers, on the website and on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio and television, Stadium Casino will print and/or provide the phrase "Gambling Problem? Call 1-800-GAMBLER"

POLICY # 12.0 - List of community, public and private treatment services

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

1. Stadium Casino 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. Stadium Casino will make available upon request the following information at each at each Security Command Center, Player Services Desk, Credit Desk and each Cashier Cage: Exhibits H, I, and J.
3. Additionally, Exhibit F, Exhibit G and Exhibit M will be displayed at each Player Services Desk, Credit Desk and Cashier Cage.

POLICY # 13.0 - Certification process to verify that each employee has completed the required training and annual reinforcement training

Stadium Casino 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 Stadium Casino will be trained in accordance with the employee training program (Exhibit B). Appropriate employees, as specified herein, will be trained in the TIPS program by a trainer certified by and through the TIPS program (Exhibit C). Employees of specific departments will be trained in departmental specific training regarding policies and procedures as set forth in this Plan and their orientation.

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 and by the certificates of training completion (Exhibit L). This record of training attendance will be kept on file in the Human Resources Department.
2. Verification of TIPS training will be demonstrated pursuant to the TIPS certification process, which requires attendance at classroom training conducted by a certified TIPS trainer and satisfactory completion of written testing. Attendance will be demonstrated on "sign in" and "sign out" sheets and by the certificates of training completion (Exhibit L). 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 (Exhibit K) 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 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 include the employee's printed name and employee signature above the following phrase: "By my signature on this page I certify that I have attended and completed the [initial or annual] 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." See Exhibit L for copy of the certification.
5. Additionally, the signature of the person conducting the training program, 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 employee's personnel file.

POLICY # 14.0 - Estimated cost for development, implementation and administration of the plan

Stadium Casino has developed, implemented and is administering this plan with an initial annual budget of \$50,000.

The Plan is provided with an initial annual budget of \$50,000 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. The estimated itemized list is as indicated:

- a. Printing signage and brochures -- \$3,500
- b. Reinforcement training sessions with outside presenters (annual) -- \$10,000
- c. Sponsorship -- Council on Compulsive Gambling of PA -- \$10,000
- d. Outreach and incidental fees -- \$5,000
- e. Employee training (materials and facility) -- \$1,500
- f. Contingency and miscellaneous -- \$5,000

POLICY # 15.0 - Procedures to prevent underage gambling

Persons under the age of twenty-one (21) ("underage") are prohibited from gambling and being on the 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. Stadium Casino 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* and as provided in Exhibit A.
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. If patrons do not wish to be repeatedly asked to produce valid, legally acceptable government issued photo identification, they may elect to wear bracelets placed on their wrists by a security officer who has verified their age/identification. Rotating colored bracelets will be placed on the individual, by the security officer, if requested by a patron who is of legal age to gamble and consume alcohol in the Commonwealth of Pennsylvania.
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. Security will not permit an individual to enter or transverse the gaming floor without having presented a valid, legally acceptable government issued photo identification that indicates that the individual is at least 21 years of age. Underage individuals may be escorted around the gaming floor utilizing pathways that have been specifically excluded from the gaming floor if accompanied by an adult 21 years of age or older and with an escort of the Security Department only to a restaurant, retail shop or other non-gaming amenity.
 5. 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 his or her manager who will enact the security procedures related to underage gambling as set forth in the Security Department duties and responsibilities below.
 6. 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 contests or tournaments are conducted, all patrons who appear under the age of 30 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 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 officer(s) 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 Security Shift Manager 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 it to the Security Shift Manager. The Security 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 both the Casino Compliance Representative and the Director of Security for review and initialing in computer system and the Director of Security will ultimately forward a copy of the report to the Legal Department.
- 6) The Director of Security, or, in his absence, the Security Shift Manager, 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 all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The security personnel, food and beverage personnel, player services personnel 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 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 Surveillance 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. **Player Service Department** - Player services representatives are responsible for the visual monitoring of patron activity on the gaming floor. Player services representatives 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 player services representative 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 he or she will immediately notify his or her manager who will contact the Security shift manager who will enact the security procedures related to underage gambling as set forth above.

- 2) Security Shift Manager will document the incident and notification efforts on an incident report.
- d. 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 gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips. For cashing of vouchers, all cage cashiers will request legally acceptable government issued photo identification as proof of age when the individual attempting to cash the voucher(s) appears to be 30 years old or younger.
- 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 Cage Shift Manager.
 - 2) If the Cage Shift Manager is unable to verify the age of the individual, he will notify the Security Shift Manager who will enact the security procedures related to underage gambling as set forth above.
 - 3) The Cage Shift Manager 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 Shift Manager will document the incident and notification efforts of the Cage on an incident report.
- e. 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. Without such identification, the patron will not be registered or issued a Player's Club card. 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. No address other than the address shown on the identification presented will be accepted for entry into the player tracking system. Subsequent address changes will be permitted if the patron can verify the information originally provided and provide proof of the change of address.
- 1) At the time of Player's Club registration, a patron must provide legally acceptable government issued photo identification 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 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 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, player services personnel will immediately notify the player services shift manager, who will notify the Security Shift Manager who will enact the security procedures related to underage gambling as set forth above.
 - 5) The 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 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 shift manager if a patron appears to be under 21 years of age (as set forth in TIPS training materials, Exhibit C) and is on the gaming floor or consuming or attempting to consume alcohol. Food and beverage personnel with patron contact will notify the food and beverage shift manager, who will notify the Security Shift Manager who will enact the security procedures related to underage gambling as set forth above. The Security Shift Manager will document the incident and notification efforts on an incident report.
- g. 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. Table games employees will verify the age of an individual by inspecting legally acceptable government issued photo identification prior to the exchange of gaming chips if the individual appears to be 30 years old or younger.
- 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 his or her manager, who will contact the Security Shift manager, who will enact the security procedures related to underage gambling as set forth above.
 - 2) The Security Shift Manager will document the incident and notification efforts on an incident report.
- h. Credit Department* - Credit Department is responsible for ensuring that individuals 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 his or her manager.
 - 2) If the manager is unable verify the age of the individual, he will notify the Security Shift Manager who will enact the security procedures related to underage gambling as set forth above.

POLICY # 16.0 - Procedures to prevent excluded persons from gambling

1. Stadium Casino prohibits excluded persons from gambling. Stadium Casino 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 General Counsel (or, in his or her absence, the Assistant General Counsel) to the Casino Compliance Representative.
 - b. The General Counsel (or, in his or her absence, the Assistant General Counsel), within 2 business days of receipt of the list, disperses the list and additions, deletions, changes and other updates to: Director of Player Services, Player Services Shift Manager, Director of Cashiering, Director of Database Marketing, Director of Surveillance, Director of Security and Director of Table Games. The Directors are responsible for ensuring that all managers and above for Player Services, Cashiering, and Table Games Departments review the information and photographs of the excluded persons at least 30 minutes per month to become familiar with the appearance and physical description of each excluded person.
2. A hard copy of the exclusion list is kept at the Security Command Center, Surveillance Monitor Room, the Cashier Cage, the Player Service Desk and Table Games Manager Office. The Security, Cashiering, Player Services and Table Game Departments will preshift the photographs and information of new excluded persons on a weekly basis. Employees of Surveillance will review the information and photographs of the Excluded persons on a continuing basis through a video screen in the Surveillance Monitor Room to become familiar with the appearance, identity and physical description of each excluded person. For at least 30 minutes per month, all members of the Security Department will review the information and photographs of as many Excluded persons as possible to become familiar with the appearance, identity and physical description of each excluded person.
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 Director of Database Marketing or a Player Services Shift manager within 5 business days after the day notice is mailed or transmitted electronically to Stadium Casino. If no player tracking system account exists for an individual on the exclusion list, the Director of Database Marketing or Player Services Shift 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 Stadium Casino. In addition, any complimentary points that may be due to the patron as a result of gaming play at Stadium Casino will be deleted, and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotionals.

4. Any employee who suspects that an individual is on the Exclusion List, or is a person known to satisfy the criteria of subsection 5(a)-(d) below, shall immediately notify the Security Shift Manager who will enact the security procedures related to Excluded Persons as set forth below.
5. The General Manager or his or her designee shall inform the BIE, in writing, of the names of persons that Stadium Casino 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.
 - 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 Surveillance Shift Manager 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 Security Shift Manager 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 Security Shift Manager 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 Security Shift Manager, who will forward to the Director of Security, who will forward the incident report to the Legal Department.
 - 3) The Security 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, who will review and sign the form, and ultimately forward a copy of the report to the Casino Compliance Representative on duty.
 - 4) The Security Shift Manager will complete the necessary reports, logbooks and paperwork within one hour of the incident, or within one hour of their return to work. Such paperwork will be reviewed and initialed in the computer system by the Director of Security. However, in no case shall the completion and forwarding of the details of the incident to the Casino Compliance Representative on duty be greater than eight (8) hours from the occurrence of the incident.
 - 5) The Director of Security, or, in his absence, the Security Shift Manager, will notify the Director of OCPG within 24 hours.
- 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 both the electronic and hard copy of the Exclusion list in the Surveillance Monitor Room. The Surveillance Director and Surveillance Shift Manager 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 Security Shift Manager 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 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. **Player Services Department** - All Player Services Representatives are responsible for the visual monitoring of patron activity on the casino floor. The Player Services Department will maintain current copies of the exclusion list at the Player Services Desk. All Player Services department personnel are responsible for becoming familiar with the photographs of the excluded persons and for monitoring the casino floor for excluded persons. Player Services Representatives 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 flastadium Casinod as being on the exclusion list.
- 1) If any Player Services Representative 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 player services representative will immediately notify the Security Shift Manager who will enact the security procedures related to excluded persons as set forth above.
 - 2) The Security Shift Manager will document the incident and notification efforts on an incident report.
- d. **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 gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips. For cashing vouchers, all cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system when the individual or his information appear to represent an excluded or self excluded individual.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flastadium Casinod as an excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Cage Shift Manager.
 - 2) The Cage Shift Manager will notify the Security Shift Manager who will enact the security procedures related to excluded persons as set forth above.
 - 3) The Cage Shift Manager 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 Shift Manager will document the incident and notification efforts of the Cage on an incident report.

- e. **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 Director of Database Marketing or a Player Services Shift Manager within 5 business days after the day notice is mailed or transmitted electronically to Stadium Casino. In addition, the account will be for Stadium Casino any complimentary points that may be due to the patron as a result of gaming play at Stadium Casino 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 promotions.
- 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. Without such identification, the patron will not be registered or issued a Player's Club card. No address other than the address shown on the identification presented will be accepted for entry into the player tracking system. Subsequent address changes will be permitted if the patron can verify the information originally provided and provide proof of the change of address.
 - 2) A Player's Club Card will not be issued to an individual who is for Stadium Casino 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 their supervisors, who will notify the Security Shift Manager who will enact the security procedures related to excluded persons as set forth above.
 - 5) The 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 Director of Database Marketing office. All Marketing personnel who are involved in the self exclusion process will review the exclusion list for at least 30 minutes per month.
- f. **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 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. Table games employees will verify the identity of an individual by inspecting legally acceptable government issued photo identification and reviewing the player tracking system prior to the exchange of gaming chips if the individual or his information appear to represent an excluded or self excluded individual.
- 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 his or her manager, who will contact the Security Department Shift Manager who will enact the security procedures related to excluded persons as set forth above.

2) The Security Shift Manager will document the incident and notification efforts on an incident report.

g. **Credit Department** - Credit Department is responsible for ensuring that individuals who are on the exclusion list do not receive credit. 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 his or her manager, who will contact the Security Department Shift Manager.

POLICY # 17.0 - Procedures to prevent self-excluded persons from gambling

1. Stadium Casino prohibits self-excluded persons from gambling. Stadium Casino 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* and as provided in Exhibit A.
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. Stadium Casino'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 Stadium Casino of additions, 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. Stadium Casino 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 the General Counsel (or, in his or her absence, the Assistant General Counsel) to the Casino Compliance Representative.
 - b. The General Counsel (or, in his or her absence, the Assistant General Counsel) 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: Director of Player Services, Player Services Shift Manager, Director of Cashiering, Director of Database Marketing, Director of Surveillance, Director of Security and Director of Table Games. The Directors are responsible for ensuring that all managers and above for Player Services, Cashiering, and Table Games Departments review the information and photographs of the self-excluded persons at least 30 minutes per week 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 the Security Command Center, Surveillance Monitor Room, Player Services Desk, Cashier Cage and Table Games Manager Office. The Security, Cashiering, Player Services and Table Games Departments will preshift the photographs and information of new self-excluded persons on a weekly basis. Employees of Surveillance will review the information and photographs of the self-excluded persons on a continuing basis through a video screen in the Surveillance Monitor Room to become familiar with the appearance, identity and physical description of each self-excluded person. At least 30 minutes per week, all members of the Security Department will review the information and photographs of as many self-excluded persons, with emphasis on both new self-excluded persons and those who live within 25 mile radius of the facility, as possible to become familiar with the appearance, identity and physical description of each self-excluded person.
6. The Director of Database Marketing or a Player Services Shift 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 Stadium Casino. In addition, any complimentary points that may be due to the patron as a result of gaming play at Stadium Casino 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 Director of Database Marketing or a Player Services Shift 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 Stadium Casino.

7. The Director of Database Marketing or a Player Services Shift 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 Stadium Casino. 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. Stadium Casino will ban self-excluded individuals from all areas of its licensed facility.
9. 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*.
10. 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.
11. 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 Surveillance 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 and if a comparison match is indicated, the Security Shift 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 a "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 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 will immediately inform the Security Shift Manager or in his absence, the Security Director, of the incident.
 - 2) The Security 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, who will sign the report and ultimately forward a copy of the report to the Casino Compliance Representative and the Legal Department.
 - 3) The Security Shift Manager will complete the necessary reports, logbooks, and paperwork within four (4) hours of the incident. Such paperwork will be reviewed and initialed in the computer system by the Director of Security. However, in no case shall the completion and forwarding of the details of the incident to the Casino Compliance Representative be greater than eight (8) hours from the occurrence of the incident.
 - 4) The Director of Security, or, in his absence, the General Counsel or Assistant General Counsel, will notify the Director of OCPG within 24 hours of the incident.
- 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 Shift Manager 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 Shift Manager 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 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. **Player Services Department** - All player services representatives are responsible for the visual monitoring of patron activity on the gaming floor. Player services representatives 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 player services representative 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 player services representative will

- immediately notify the Security Shift Manager who will enact the security procedures related to self-excluded persons as set forth above.
- 2) The Security Shift Manager will document the incident and notification efforts on an incident report.
- d. **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 gift certificates/cards, customer deposits, creation of signature file, preparation or increase of a credit limit and the preparation of jackpot payout slips. For cashing vouchers, all cage cashiers will request legally acceptable government issued photo identification and will check the identification against the player tracking system when the individual or his information appear to represent an excluded or self excluded individual.
- 1) If a patron cannot produce legally acceptable government issued photo identification, or if the individual is flastadium Casinod as a self-excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify the Cage Shift Manager.
 - 2) The Cage Shift Manager will notify the Security Shift Manager who will enact the security procedures related to self-excluded persons as set forth above.
 - 3) The Cage Shift Manager 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 Shift Manager will document the incident and notification efforts of the Cage on an incident report.
- e. **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 Director of Database Marketing or Player Service Shift Managers within 5 business days after the day notice is mailed or transmitted electronically to Stadium Casino. In addition, the account will be flastadium Casinod any complimentary points that may be due to the patron as a result of gaming play at Stadium Casino 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 promotions.
- 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. Without such identification, the patron will not be registered or issued a Player's Club card. No address other than the address shown on the identification presented will be accepted for entry into the player tracking system. Subsequent address changes will be permitted if the patron can verify the information originally provided and provide proof of the change of address.
 - 2) A Player's Club Card will not be issued to an individual who is flastadium Casinod 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 their shift manager, who will notify the Security Shift Manager who will enact the security procedures related to self-excluded persons as set forth above.
- 5) The Security Shift Manager will document the incident and notification efforts on an incident report.

f. **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. Table games employees will verify the identity of an individual by inspecting legally acceptable government issued photo identification and reviewing the player tracking system prior to the exchange of gaming chips if the individual or his information appear to represent an excluded or self excluded individual.

- 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 his or her manager, who will contact the Security Shift manager who will enact the security procedures related to self-excluded persons as set forth above.
- 2) The Security Shift Manager will document the incident and notification efforts on an incident report.

g. **Credit Department** - Credit Department is responsible for ensuring that individuals who are on the self-exclusion list do not receive credit. 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 his or her manager, who will contact the Security Shift Manager.

POLICY # 18.0 - Procedures to prevent intoxicated patrons from engaging in gaming activities

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

1. Stadium Casino has trained its Security and Food and Beverage employees who have patron contact in TIPS (Exhibit C) and as set forth in the policy 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. Certificates of training completion, for initial and annual reinforcement trainings for 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 include the employee's printed name and employee signature above the following phrase: "By my signature on this page I certify that I have attended and completed the [initial or annual] 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." See Exhibit L for copy of the certification.

2. Visibly intoxicated patrons will be denied entry to the entire property by security officers stationed at the approved entrance posts to prevent the patron from engaging in gaming activities and from entry to the entire property.
3. Specific departments have duties and responsibilities as set forth below:
 - a. **Security Department** - Upon visual observation or notification of any patron identified, or suspected to be visibly intoxicated, the security officer will notify Security Command 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 (as set forth in TIPS training materials, Exhibit C).
 - 1) If the security officer or Security Shift Manager determines the patron is visibly intoxicated, the security officer or Security Shift Manager will explain to the patron that he or she appears to be visibly intoxicated and advise the patron he or she is not permitted to enter the gaming floor or areas off the gaming floor where contests or tournaments are conducted on the property, or if located on areas off the gaming floor where contests or tournaments are conducted on the gaming floor or elsewhere in the facility, that he or she must stop drinking. The security officer or Security Shift Manager 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 Shift Manager will assist the patron and Stadium Casinost the patron visit a restaurant and/or take a break. The security officer or Security Shift Manager will arrange for the patron to obtain a food item.
 - 2) Security shall remain with the intoxicated patron until arrangements for his or her safe departure have been secured. If the patron refuses to give up the alcoholic beverage, refuses to leave the gaming floor or becomes unduly disruptive, the security officers will notify the PSP assigned to Stadium Casino 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 Shift Manager will immediately notify Bensalem Police Department.
- 3) If the patron has valet parked his or her vehicle, the car will not be returned to him or her until satisfactory and safe travel arrangements have been made.
 - 4) Security officers and surveillance personnel 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 Shift Manager 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. **Player Services Department** - Upon observation of a patron who appears to be visibly intoxicated, player services personnel will immediately notify their Shift Manager. The Shift Manager shall contact the Security Shift Manager so that Security will enact the procedures as set forth above. The Security Shift Manager will document the incident and notification efforts on an incident report.
- d. **Food and Beverage Department** - Although security officers will be asking anyone who appears to be 30 years or age or under 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 security officer if a patron appears to be visibly intoxicated (as set forth in TIPS training materials, Exhibit C). Food and beverage personnel with patron contact will notify their beverage manager for alcohol service suspension/refusal of service once they have determined a patron is showing signs of intoxication. Service to the patron will be suspended by the beverage manager. Security officer(s) will assist in the suspension of service if required. They will inform the patron of Pennsylvania State Liquor laws and security will enact the procedures as set forth above. The Security Shift Manager will document the incident and notification efforts on an incident report.
- e. **Valet Department** - Any valet personnel with patron contact will notify the Security Department if they suspect that a patron is intoxicated and attempts to obtain his or her car to leave the facility. The Security Shift Manager will enact the procedures set forth above. Security officer(s) will assist in the refusal to return a parked car to an intoxicated patron. The Security Shift Manager will document the incident and notification efforts on an incident report.
- f. **Table Games Department** - Upon observation of a patron who appears to be visibly intoxicated, table games employees will immediately notify their manager. The manager shall contact the Security Shift Manager so that Security will enact the procedures as set forth above. The Security Shift Manager will document the incident and notification efforts on an incident report.

POLICY # 19.0 - Details of outreach program(s) offered to employees and other individuals

Stadium Casino does not currently offer a formal outreach program to its employees or other individuals. However, as individual employee's needs are made known to management, appropriate assistance is offered and encouraged. As Stadium Casino matures as a company and develops its employee programs, any outreach programs that are initiated will be outlined in an amended CPG Plan to be submitted to and approved by the Director of the OCPG.

POLICY # 20.0 - Plan for posting approved signs in the facility and materials offered to the public

Stadium Casino 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 font size are submitted for approval as Exhibit A with this CPG Plan. For purposes of this section, the term "advertisement" means marketing materials including signs, billboards, print, radio and television advertisements, emails and any notice or communication to the public through broadcasting, publication, mailing or other means of dissemination. The General Counsel (or in his or her absence the Assistant General Counsel) 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.

1. Stadium Casino will post a minimum of 20 signs bearing the gambling assistance message which is the phrase: "Gambling Problem? Call 1-800-GAMBLER." The complete text of the sign is as set forth in Exhibit A. 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. Stadium Casino will post the gambling assistance message, "Gambling Problem? Call 1-800-GAMBLER" on placards in the gaming floor entrances.
3. Stadium Casino 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, print, radio and television advertisements as well as on daily racing programs available to the general public.
4. Stadium Casino 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." (as set forth in Exhibit A).

5. Stadium Casino 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.
6. Stadium Casino advertisements will not use or depict individuals who appear to be under 21 years of age.
7. Stadium Casino 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.
8. Stadium Casino 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.
9. Consistent with applicable regulations, the height of the font used for the gambling assistance message in signs, direct mail marketing materials, posters 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 or other print advertisement, unless a smaller % is approved by the Director of OCPG.
10. Consistent with applicable regulations, 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, unless a smaller % is approved by the Director of OCPG.
11. Consistent with applicable regulations, 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 and/or different % is approved by the Director of OCPG.
12. Stadium Casino will not employ or contract with an individual to persuade or convince a person to engage in gaming or play a specific slot machine or table game at Stadium Casino.

POLICY # 21.0 - Procedures to prevent cashing of certain checks for patrons

Stadium Casino prohibits the cashing of any check except a personal check and checks issued to patrons by Stadium Casino 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. Stadium Casino cashes personal checks and checks issued to patrons by Stadium Casino for gaming purposes.
2. **Personal checks and checks issued to a patron by Stadium Casino will be cashed only at the Casino Cage.** Cashiers and Cage Management will cash personal checks only in accordance with the procedures outlined in Stadium Casino's approved Accounting and Internal Controls and as set forth in the policy titled *Procedures to prevent underage gambling*, policy titled *Procedures to prevent excluded persons from gambling* and policy titled *Procedures to prevent self-excluded persons from gambling*. [Stadium Casino Internal Control 465a.20(b)-(c)]
3. Stadium Casino will not cash third party checks, checks from any government agency issued for any purpose, or paychecks.
4. No one in Stadium Casino Management or Ownership may authorize an exception to the cashing of only personal checks and checks issued to a patron by Stadium Casino.

POLICY # 22.0 - Other policies and procedures intended to be used beyond what is required

Stadium Casino does not have any other policies or procedures beyond what is required under 58 Pa. code § 501a:2(d) to prevent and raise awareness of compulsive and problem gambling. However, Stadium Casino expects to implement additional programs as its casino business matures and develops. Any policies and procedures so developed will be included in an amended CPG Plan to be submitted to and approved by the Director of OCPG.

POLICY # 23.0 - Procedures to ensure that certain individuals may not obtain credit

1. Stadium Casino offers credit at its licensed facility. In order that individuals on the Voluntary Credit Suspension List do not obtain credit, Stadium Casino instituted the following procedures.
2. A casino compliance representative will provide Stadium Casino General Counsel and Assistant General Counsel with the advisories of patrons who have requested Voluntary Credit Suspension. Stadium Casino General Counsel and Assistant General Counsel will, within 24 hours, forward the notification to the Credit Department for processing.
3. The Credit Department will maintain a copy of the voluntary credit suspension list and will ensure that the copy of the list is updated within 24 hours after the Credit Department receives an updated list. 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.

4. A member of the Credit Department will check the Bally ASCS system for the patron's account and will change the status on that account to denote credit suspension. As a result, this patron can no longer receive credit from Stadium Casino. If the patron does not have an account with Stadium Casino, a member of the Credit Department will create a credit account for that patron in the Bally ASCS system and will denote credit suspension for that new account.
5. 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 Stadium Casino. If the patron does not have a credit account, the Voluntary Credit Suspension / Removal Form will be attached to Stadium Casino's VCS List with the notification received from Stadium Casino General Counsel and Assistant General Counsel.
6. A casino compliance representative will provide Stadium Casino General Counsel and Assistant General Counsel with the advisories of patrons who have been removed from Voluntary Credit Suspension. Stadium Casino General Counsel and Assistant General Counsel will forward the removal notification to the Credit Department for processing within 2 business days of receipt.
7. The Credit Department will remove the patron from Stadium Casino's VCS List within 3 business days of receipt from General Counsel/Assistant General Counsel.
8. 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.
9. A member of the Credit Department will sign the Voluntary Credit Suspension / Removal Form, including the date and time of removal.
10. A member of the Credit Department will remove the patron from Stadium Casino's VCS List.
11. A member of the Credit Department will eliminate the credit suspension denotation on the patron's account in the Bally ASCS system.
12. A hard copy of Removal from Voluntary Credit Suspension notification will be placed in the patron's credit file if they have an account with Stadium Casino or in the VCS List if the patron has no credit account at Stadium Casino.
13. The VCS List will be posted in the Credit Department and Casino Cage.

**LIST OF ATTACHMENTS TO COMPULSIVE AND PROBLEM GAMBLING
PLAN**

- A Text of Casino Entrance and Cage Signs
- B Responsible Gaming Training Manual for Employees
- C TIPS Training Manual
- D Responsible Gaming Brochure
- E Self-Exclusion Request Form
- F Self-Exclusion Brochure
- G Problem Gambling Brochure
- H Referral Sources for Local Treatment Options
- I Gamblers Anonymous Pennsylvania Directory
- J GAM-ANON Pennsylvania Directory
- K Attendance List for Responsible Gaming Training
- L Employee Certification for Responsible Gaming Training
- M Voluntary Credit Suspension Brochure

Exhibit A

plan view

2'-1 1/2"

1'-10"

Pursuant to 58 Pa. Code Part VII:

- It is unlawful for any person under 21 years of age to engage in any gaming activities. Individuals violating this prohibition will be removed and may be subject to arrest for criminal trespass under 18 Pa. C.S. 53503 (relating to criminal trespass).
- A person who is on the self-exclusion list will be subject to arrest for trespassing under 18 Pa. C.S. 53503 (relating to criminal trespass) if the person is on the gaming floor or engaging in gaming activities.
- The possession of a deadly weapon, stun gun or other device designed to injure or incapacitate a person by any person within this licensed facility without the express written permission of the Pennsylvania Gaming Control Board is prohibited.

Gambling Problem? Call 1-800-GAMBLER



A
B
C
D

location: main entrance
sign type: T-A / 6 req.

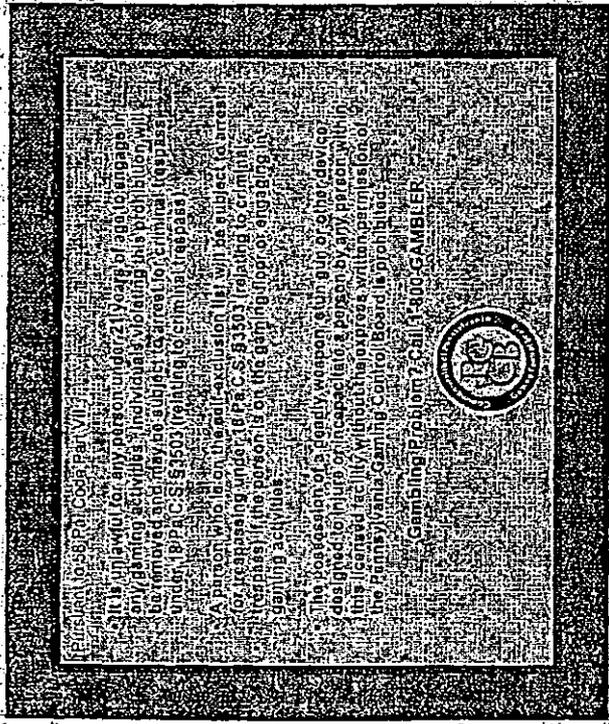
- A 3/8" thick frame w/ Tinag Wood veneer; paint on returns to match.
- B painted reveal; (BM 2112-20 Brown Sugar).
- C 1/8" thick non-glare acrylic w/ second surface paint; (DE 5296 Granola).
- D silk screened copy and graphics; (BM 2112-20 Brown Sugar).

SIGN SPEC

DATE: 10/20/09	DESIGNER: J. HURLEY
LOCATION: MAIN ENTRANCE	SCALE: 1/4" = 1'-0"
PROJECT: INDOOR REGULATORY SIGNAGE	DATE: 10/20/09
APPROVED BY: [Signature]	DATE: 10/20/09

1-11-72

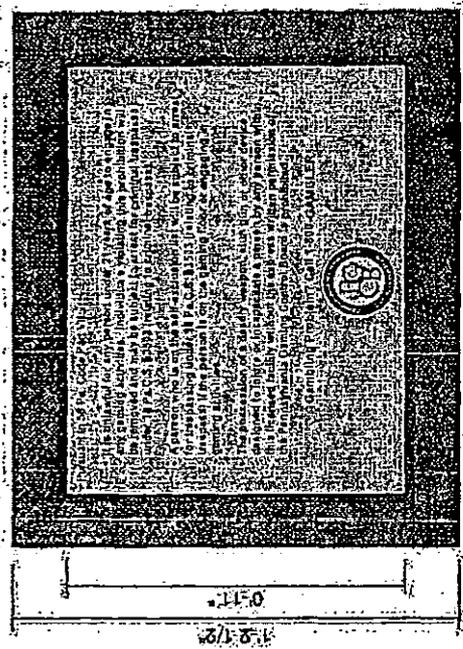
1-8"



location: ancillary entrance
sign type: 1-B / 2: req.

1-5 1/2"

1-8"



location: cage area
sign type: 1-C / 3: req.

side view

side view

SIGNSPEC

SIGN: IN WARD
 location: PAX CASINO
 project: INTERIOR REGULATORY SIGNAGE

DATE: 11/21/72
 DESIGNER: ADH
 MATERIAL: 1/8" ALUMINUM

BY: []
 CHECKED: []
 DATE: []

POST # 0613
 JOB #
 DRAWING # 10943D-1-0

Exhibit B

RESPONSIBLE GAMING:
Customer Assistance Program
Refresher Training

STADIUM CASINO, LLP

Helpline: 1-800-Gambler

Customer Assistance Program Evaluation

- 1. The Customer Assistance Program can best be described as:**
 - a. The name of a new responsible gaming brochure**
 - b. New Employee Assistance Program for Lottery employees**
 - c. The Responsible Gaming Program encouraging the offer of assistance and use of the Helpline**
- 2. The number of adults in the U.S. believed to be problem gamblers is:**
 - a. 4-5%**
 - b. 2-3%**
 - c. 10-12%**
- 3. Compulsive Gambling is:**
 - a. A bad habit that is hard to break**
 - b. A progressive psychiatric disorder**
 - c. A kind of obsessive compulsive disorder**

Customer Assistance Program Evaluation

(continued)

4. Underage Gambling laws prohibit purchase of Lottery tickets by:
 - a. Any person under 18
 - b. Any person under 16
 - c. Any person under 21
5. Warning signs of a gambling problem include:
 - a. Wagers of over \$100, or complaints from a customer
 - b. Change in pattern of play, borrowing from customers, cannot stick to limits
 - c. Regular play at the same amount, same numbers played every day, use of credit

Council on Compulsive Gambling of Pennsylvania

Customer Assistance Program Evaluation

(continued)

6. The first thing to do in order to help a compulsive gambler is:
 - a. Make him/her understand they have a gambling problem and need help
 - b. Offer support, listen, suggest use of the Helpline
 - c. Call a supervisor and have the customer sign a self-exclusion form

7. The *first* Resource to always consider and offer a customer or co-worker is:
 - a. The free Helpline service
 - b. Your supervisor or security officer
 - c. Gamblers Anonymous

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Customer Assistance Program Evaluation

(continued)

8. Self Exclusion in Pennsylvania allows gamblers to select a period of time to self exclude this is:
 - a. Lifetime only
 - b. 1 or 5 years
 - c. 1 year, 5 years or Lifetime
 - d. For as long as they think necessary

9. The office in charge of self exclusion administration and monitoring is:
 - a. Bureau of Drug and Alcohol Programs
 - b. Pennsylvania Lottery Commission
 - c. Pennsylvania Gaming Control Board
 - d. Council on Compulsive Gambling of Pennsylvania

Council on Compulsive Gambling of Pennsylvania

Customer Assistance Program Evaluation

(continued)

10. Responsible Gaming practices are:
 - a. The supervisors job
 - b. Gaming Control Board's job
 - c. Gamblers Anonymous member's job
 - d. Every employees job

11. What is your Casino 800 Helpline number: _____

12. How many Warning signs are there: _____

Customer Assistance Program Evaluation

(continued)

Please be sure your name and ID number are listed on this test.

Name: _____ Date: _____

The Customer Assistance Program: A Service Approach to Problem & Underage Gambling

- Philadelphia Park has adopted the Customer Assistance Program to offer effective assistance to anyone that may need help with a gambling problem.
- The Customer Assistance Program will encourage and support responsible gaming practices and pro-actively address problem and underage gambling.

Council on Compulsive Gambling of Pennsylvania

What Is Responsible Gaming? Responsible Gaming Is:

- **Gambling that is meant to be fun and entertaining.**
- **Sticking to limits with time and money.**
 - **Not spending more than you can afford to lose.**
 - **Gambling that DOES NOT cause problems at home, on the job, legally or financially.**

Council on Compulsive Gambling of Pennsylvania