

PITG GAMING, LLC

DIVERSITY PLAN

As of December 2005

**DRAFT FOR SUBMISSION TO THE
PENNSYLVANIA GAMING CONTROL BOARD**

OVERVIEW

The PITG Gaming Diversity Action Plan describes four major areas of focus: Supplier Diversity, Diversity in the Workplace, Diversity in Guest Experience and Diversity in Ownership. This plan will guide our employees in their efforts to build a more effective company by increasing the understanding and the awareness of diversity and illustrate how diversity will improve the overall economic, and cultural health of the city, county and commonwealth.

To ensure that your community prospers in the 21st century, it needs a company that embraces diversity. We have learned the importance of employing people because of their differences and building relationships with minority and women business enterprises. PITG Gaming values the unique qualities and perspectives that your community brings to the table.

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Section I - Supplier Diversity

PITG GAMING POLICY STATEMENT FOR CONDUCTING BUSINESS WITH MINORITY AND WOMEN BUSINESS ENTERPRISES

PITG Gaming is committed to the principles of equal opportunity and affirmative action. This commitment includes a program to increase business conducted with Minority and Women Business Enterprises. Establishing positive relationships with minority and women business enterprises strengthens PITG Gaming. We recognize the importance of strengthening economic development for MBE/WBE businesses and the community in the Pittsburgh Metropolitan area, Allegheny County and the Commonwealth of Pennsylvania. PITG Gaming vision is to develop a strong base of MBE/WBE suppliers that will provide world-class goods and services.

To achieve this commitment, PITG Gaming will hire a Business Development Manager, who will develop, implement and monitor an action plan aimed at increasing business conducted with certified Minority and Women Business Enterprises, especially those located in Pittsburgh and Allegheny County, Pennsylvania. The Business Development Manager will also chair our Business Development Committee, which will include the General Manager, Vice President of Operations and key department heads.

This policy applies to every department of PITG Gaming and all expenditures for goods and service on its behalf. We will make good faith efforts to reach our goals and expend at least twenty (20) percent of our total qualified disbursements with certified minority business enterprises (or firms pending certification) and ten (10) percent with certified women business enterprises (or firms pending certification). We will increase these targets as appropriate.

All departments purchasing goods or services or requesting the purchase of goods or services are charged with the responsibility to achieve our goal.

PITG GAMING IS COMMITTED TO MEETING THE MINORITY AND WOMEN BUSINESS ENTERPRISE PROCUREMENT GOALS.

The MBE/WBE Business Development Committee will meet monthly to monitor the Company's progress. A monthly report of our progress will be submitted to a Corporate Officer for review. As requested, it will be provided to the PGCB and local elected officials.

The Business Development Manager will be responsible for:

Creating a strategic sourcing plan

This plan will include an analysis of commodities and construction services to be purchased by PITG Gaming and vendor capabilities to match our requirements. We will share information from our sourcing plan with MBE/WBE vendors and, whenever possible, also commit to ordering for a specific period of time rather than placing one-time orders.

Monitoring and Accountability

Monthly reports will monitor our progress against the strategic sourcing plan. These reports will be distributed to the Business Development Committee. The reports will highlight areas of progress and areas where issues may be delaying progress and +

Utilization Plans

The Business Development Manager will monitor the procedures for awarding bids to insure MBE/WBE vendors are included in bid requests.

Department Orientation

The Business Development Manager will meet with all PITG Gaming Department Heads to orient them to our commitment and action plan in order to:

- Create awareness of the program's goals and company's commitment.
- Apprise them of MBE/WBE business issues.
- Inform them of resources available.

Purchasing Department Orientation

The Business Development Manager will meet with the Purchasing Manager and all employees having purchasing authority to orient them to our commitment and action plan in order to:

- Create awareness of the program's goals and PITG Gaming's commitment to the goals;
- Apprise them of the MBE/WBE business issues;
- Provide constant updates to the MBE/WBE strategic sourcing plan (see page 6) and,
- Inform them of the resources available to assist them.

Benchmarking

The Business Development Manager will meet with other area companies committed to MBE/WBE procurement to determine best practices and expand our MBE/WBE vendor sources.

Communication and Outreach

- The Business Development Manager will develop an MBE/WBE business opportunity brochure and website. They both will outline our MBE/WBE business policy, our purchasing procedures, bidding opportunities and list key contact persons, in order to do business with PITG Gaming.
- The Business Development Manager will actively participate in meetings with the Commonwealth of Pennsylvania Bureau of Minority & Women Business Opportunities, Pittsburgh Regional Minority Purchasing Council, City of Pittsburgh Equal Opportunity Commission, The Pittsburgh Chamber of Commerce, African American Chamber of Commerce, Allegheny County Minority Enterprise Program and other MBE/WBE business development organizations.
- The Business Development Manager will work with our Marketing Department to build awareness of our goals and program. We will use electronic, print media, and other collateral information to inform vendors of our buying plans and progress toward goals
- The Business Development Manager will participate in trade shows and business conferences to inform vendors and contractors of our business opportunities.
- The Business Development Manager will work with the Pittsburgh NAACP, the Urban League of Pittsburgh and other women and minority organizations to help in identifying MBE/WBE vendors.

- The Business Development Manager will file periodic reports as appropriate with the Pennsylvania Gaming Control Board and others as appropriate to document our progress under this plan.

PITG GAMING IS COMMITTED TO THE FOLLOWING PROGRAMS DESIGNED TO EXPAND THE POOL OF MBE/WBES

Vendor Development

- The Business Development Manager will help to develop new vendors through flexible payment terms in order to improve working capital for the MBE/WBE vendors and commit to orders for longer than is typical in order to sustain the vendors. The Business Development Manager will also assist a developing MBE/WBE to identify and adopt financial, human resources, information systems or purchasing best practices by working with them and appropriate local, State and Federal agencies.
- Assist MBE/WBE vendors in developing relationships with manufactures to increase profit margins and to find new business opportunities both local and national.
- Host MBE/WBE vendor opportunity fairs and networking events on PITG Gaming property to meet our procurement team and end users.
- Develop PITG Gaming MBE/WBE Business Development Loan program, which offers low interest loans to Pittsburgh and Allegheny County MBE/WBE vendors to help execute contracts with the company and increase competitiveness.
- PITG Gaming will host awards banquets throughout the year to recognize outstanding MBE/WBE vendors.
- PITG will offer opportunities for local MBE/WBE vendors to conduct business with our Majestic Star and Fitzgerald properties.
- Our Business Development Manager will be responsible for forming an advisory council comprised of representatives from corporations, business resource organizations and MBE/WBE enterprises. The council will promote open dialogue with community leaders and offer feedback on our efforts. The council will meet quarterly.
- PITG Gaming is open to divestment of a non-gaming department (janitorial, landscaping, etc.) within the company to a MBE/WBE. PITG Gaming will assist the MBE/WBE until ownership has been transferred.
- PITG Gaming is open to develop a business development service that provides telephone, secretarial services, etc. At a low monthly fee for MBE/WBE vendors that need assistance.

ENHANCING MBE/WBE BUSINESS RELATIONSHIPS

Certification

PITG Gaming will make every effort to encourage and assist all non-certified MBE/WBE vendors we currently do business with to submit applications for certification to the Commonwealth of Pennsylvania Bureau of Minority & Women Business Opportunities and The Pittsburgh Regional Minority Purchasing Council.

Contract Review

PITG Gaming will review all large vendor contracts to determine which should include a requirement for subcontracting with MBE/WBES, or be broken down into several smaller contracts.

Bids/Quotes

PITG Gaming will include at least 1-2 MBE/WBES (if possible) on each Purchasing Request for Quotation (including telephone quotes).

PITG Gaming recognizes that our commitment to accepting the lowest bid can conflict with our commitment to increase MBE/WBE expenditures. We are willing to consider a higher bid, within reason, from an MBE/WBE whenever it is economically feasible to PITG Gaming until the respective company can become competitive.

PITG Gaming will ensure bidding opportunities are advertised and for large bids we will host pre-bid meetings.

Payment

PITG Gaming will make every effort to expedite payments to MBE/WBE vendors as invoiced to avoid cash flow problems.

Section II- Diversity in the Workplace

PITG GAMING POLICY STATEMENT FOR A DIVERSIFIED WORKPLACE

PITG Gaming realizes the importance of diversity and effectively managing diversity within our company. Our Management team has embraced diversity as a critical element to make our company successful. We pride ourselves on accepting individual differences and maintaining a workplace where valuing the quality of work and encouraging our team to maximize their potential is a priority. PITG Gaming is positioning itself to better meet the needs of the 21st century by becoming “The Company of Choice” in the gaming industry, regardless of sex, age, color, disability, education, marital status, national origin, religion, race or sexual orientation. This will employ the company with the best and the brightest employees available and enhance our ability to serve your community.

Diversifying our workforce is an exercise in good corporate responsibility. Individuals that benefit from good diversity practices are often from groups of people in the community that are considered disadvantaged. We will give individuals the break they need to earn a living and achieve their dreams. In addition, groups of people who have been excluded from employment become dependant on social service programs funded by tax dollars. Diversifying the work force can effectively put those tax dollars to a different use.

PITG is confident the partnership with the City of Pittsburgh, Allegheny County and the Commonwealth of Pennsylvania we will be able to have the most qualified and diverse workforce in the gaming industry.

PITG Gaming’s Strategic Plan for a diversified workforce will be monitored through our human resources department. The department will review, evaluate and monitor to ensure that the strategies are implemented. Our accomplishments will be reported to a Corporate Officer for review. As requested it will be provided to the PGCB local elected officials. PITG Gaming will encourage diverse applicants to apply, promote employees to be respectful of others individuality and provide guidance to managers and supervisors to make diversity a cornerstone in our company.

DIVERSITY EDUCATION FOR DIRECTORS, MANAGERS, SUPERVISORS AND EMPLOYEES WILL BE A REQUIREMENT.

Training of all managers, supervisors, and employees of the importance of a highly skilled and diverse workforce is a vital step in promoting workforce diversity.

Company Training

- All employees will understand the value of diversity and individual differences and will use those individual differences to improve themselves, employee and customer relations and company performance.
- PITG is dedicated to improving the lives of its employees and will be known as an Employee-Centered Learning Environment.
- To measure the awareness of PITG'S diversity efforts, employees will be given a survey on a semi-annual basis.

Management Training

- Understand and use performance assessments and other personnel tools for employee's optimal productivity.
- Understand all Federal legal requirements and company regulations and procedures related to diversity.
- Attend ongoing training classes or seminars to improve relationship building with employees.

ACTIVE OUTREACH/RECRUITMENT PLANS FOR A DIVERSE WORKFORCE

Recruiting a workforce that mirrors the community is important to successfully strengthen a community.

- Develop a diverse recruitment team to implement strategies that identify and attract a diverse applicant pool.
- Design a recruitment brochure and web site that explains our commitment to being "The Company Of Choice".
- Develop partnerships with labor agencies and local organizations with different cultural, racial or academic membership.
- Utilize an exit interview to gather suggestions and comments of our company.
- Maintain an applicant tracking system that consists of data related to diversity.
- Track and assess recruitment activities to monitor and improve the process.

RETENTION OF A DIVERSE AND VALUABLE WORKFORCE

We will improve the quality of work life to ensure job satisfaction.

- Monitor employee development and promotion practices to ensure equal opportunity and advancement in the company.
- Establish a mentor program for new as well as established employees.
- Provide reasonable accommodations for employees with disabilities, religious and cultural practices.
- Use Employee Development Plans to determine training and growth for upward mobility in the company.
- Continuously evaluate our workplace environment to eliminate barriers for employee growth.
- Develop camaraderie with inter-department activities and collaborations of projects in and outside of work

DEVELOPMENT PROGRAMS FOR EMPLOYEE ADVANCEMENT

We will develop each employee's full potential by giving direction and the tools they need to perform the work of PITG Gaming to their very best ability.

“Move Up The Ladder”

This is a career development program that focuses on under skilled employees that have demonstrated potential and an interest in advancing in the gaming industry.

Leadership Development

Provides potential managers supervisory skills, career assessment, leadership, team building and discusses management's day to day issues.

Executive Advancement

Prepares highly qualified candidates for senior level leadership. An effort will be made to attract a diverse pool of applicants that will guarantee leadership in the future.

ENFORCEMENT OF OUR ZERO TOLERANCE POLICY

PITG Gaming will provide a workplace where employees are treated fairly and respectfully

- All allegations of discrimination, harassment and retaliation will be quickly resolved with appropriate corrective actions.
- Employees will be trained on their rights and remedies under the EEO Complaint Regulations and the Whistleblower Protection Act.
- Survey employees to see if there is fair and respectful treatment on the workplace and if not remedial actions will take place.
- Implement our PITG Gaming Hotline answered by a third party to handle employee complaints.

Section III - DIVERSITY IN GUEST EXPERIENCE

PITG Gaming understands the benefits of serving an increasingly diverse guest base. It is impossible to serve diverse guests unless we are in touch with their needs. We understand that different groups of people have different needs than the mass market. Our focus will be on providing an experience, which meets the needs of a diverse guest base.

Technology is important to facilitating service a diverse guest base.

We have the technology to track the special needs and wants of our guests. PITG Gaming has the capability to gather information on our guests, which will assist us in enhancing our guests' total experience at our property. The more you are in tune with your customer, the more likely you will be able to meet their needs in providing a quality entertainment experience.

Cultural accommodations for specific groups of guests will be implemented.

Our other properties market services differently to different groups. For example, in Gary, Indiana for our Asian market we have added extra mini-baccarat tables and have instituted an Asian Club Card Program. Our Black Hawk Colorado location is in the process of translating information on property to Spanish. We will take similar appropriate steps in Pittsburgh to adapt to diverse needs of our guests.

Customer relations will win our diversity campaign.

We will hire employees to reflect the mix of our guest base and train our employees to appreciate and accommodate for different cultural perspectives and beliefs. The more our employees and guests can relate to each other the more likely we will meet their needs.

Section IV- Diversity in Ownership

We have a great opportunity for a minority business owner to join the mainstream of the Pittsburgh business community.

Don Barden is the owner of The Majestic Star Casino, LLC, the only minority-owned and operated gaming company in the United States. Mr. Barden, an African American, is the 100% owner of this company.

Mr. Barden is also the owner of Barden Development, Inc., the parent company of Fitzgerald's Las Vegas and PITG Gaming, LLC, the applicant for the Pennsylvania gaming license for the City of Pittsburgh.

Local investment is very important to Mr. Barden and important to the growth of a company. Although PITG Gaming, LLC is currently 100% minority owned, Mr. Barden has caused Barden Development, Inc. to transfer a 19% interest in PITG Gaming, LLC to PITG Gaming Investor, LLC. This 19% interest is going to be made available to other minority and woman investors and other strategic local Pittsburgh, Allegheny County and Pennsylvania residents.

This will result in PITG Gaming, LLC remaining a minority-controlled company, while also being strengthened through strategic local ownership.