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*del* Lago Resort and Casino  
**Policy and Procedures**

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**Responsible Gaming and Problem  
Gambling Plan**

*del* Lago Resort and Casino

**2017**

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## RESPONSIBLE GAMING AND PROBLEM GAMBLING PLAN

The del Lago Resort and Casino has a commitment to our Team Members, Guests, and the Community to make Responsible Gaming gaming an integral part of our daily operations. This del Lago Responsible Gaming and Problem Gambling Plan (the “Plan”) is intended to set forth the responsibilities of the del Lago Resort and Casino and its Team Members. These responsibilities include the promotion of Responsible Gaming gambling and the prevention of gambling by underage individuals, impaired individuals and individuals on the exclusion or self-exclusion lists. Every Team Member of del Lago Resort and Casino will be trained in the regulations, policies and procedures and the Responsible Gaming and Problem Gambling Plan includes all property-wide amenities and businesses.

This commitment covers the promise to our community to continue support for research initiatives and public awareness surrounding Responsible Gaming gaming and underage gambling.

### What is Responsible Gaming Gaming?

Responsible Gaming gaming is the provision of a safe, socially Responsible Gaming and supportive gaming environment where the potential for harm associated with gaming is minimized and people can make informed decisions about their participation in gaming.

### What is Problem Gambling?

Problem gambling is characterized by difficulties in limiting the money and time spent on gambling which leads to adverse consequences for the gamblers, others, or for the community. Problem Gambling, is gambling behavior which causes disruptions in any major area of life (i.e. psychological, physical, financial, legal, social or vocational) as defined by the National Council on Problem Gambling. The term “Problem Gambling” includes the condition known as “Pathological” or “Compulsive” Gambling and a less severe condition, “At Risk” Gambling.

## RGP-001-1 RESPONSIBLE GAMING GAMING AND PROBLEM GAMBLING PLAN OBJECTIVE

1. del Lago has developed a Responsible Gaming and Problem Gambling Plan with the goal of maximizing the awareness of Problem Gambling resources and awareness to all of the Team Members and guests. This document will outline the goals, procedures, and timetables for del Lago's Plan. The Plan will be kept up to date and circulated internally and provided to the NYSGC for review and approval as changes are made. The Plan will be implemented prior to the opening of the casino and will be followed by all Team Members.
2. Team Members will all be trained on this plan as part of the company orientation to ensure full understanding and compliance with all Responsible Gaming and Problem Gambling protocols. Throughout the year del Lago will offer refreshers on the Plan through a variety of means such as pre-shift briefings, Responsible Gaming awareness week and National Problem Gambling Awareness Month, and full reviews with specific key casino Team Members. It is del Lago's expectation that each and every Team Member have a firm understanding of the Responsible Gaming and Problem Gambling Plan.
3. del Lago Resort and Casino will:
  - a. Educate all del Lago Resort and Casino Team Members on what Responsible Gaming gaming means.
  - b. Educate all del Lago Resort and Casino Team Members on how to recognize the signs, characteristics and symptoms of problem gambling behavior.
  - c. Educate all del Lago Resort and Casino Team Members on the relationship of problem gambling to other addictive behavior.
  - d. Educate all del Lago Resort and Casino Team Members on the location of problem gambling literature and explain how to handle guests seeking such information.
  - e. Educate all del Lago Resort and Casino Team Members on the process of assisting guests that are suspected of problem gambling and delivery of literature to them on the process of voluntary exclusion and other resources including both public and private treatment services.

- f. Make literature available in designated public locations that describes the characteristics of problem gambling and the best way to seek help.
- g. Prevent all known underage guests from wagering.
- h. Prevent any individual that is impaired due to the apparent use of drugs or alcohol from wagering.
- i. Visibly display signage with the telephone number for the problem gambling hotline (1-877-8HOPE-NY).
- j. Educate Team Members regarding Responsible Gaming alcoholic beverages service to prevent any individual that is impaired due to the apparent use of drugs or alcohol from being served alcohol.
- k. Ensure that all Team Members are educated on the self-exclusion process, including where to direct guests who request to be self-excluded.
- l. Establish policies to ensure that Team Members comply with all aspects of the Internal Control Policies and Procedures as they relate to self-exclusion.
- m. Mandate attendance at Team Member orientation and annual refresher trainings, which such refresher training may be conducted via computer and/ or video, regarding Responsible Gaming gaming.
- n. Ensure that orientation and annual refresher training is conducted by an individual who is well versed in the del Lago Resort and Casino's Responsible Gaming and Problem Gambling Program, or may be administered via an online program. Departmental specific training will be conducted by a department "Responsible Gaming Gaming Champion" to be designated by the department director.

## **RGP-001-2 COMMITMENT FOR TEAM MEMBER TRAINING**

1. del Lago Resort and Casino will educate all casino Team Members regarding problem gambling, gambling by impaired guests, prevention of underage gambling, and the identification and removal of excluded and self-excluded guests. All Team Members of del Lago Resort and Casino will receive Responsible Gaming training while certain

departments will receive specific training that is only pertinent to those Team Members. The training program includes the following:

- a. characteristics and symptoms of compulsive behavior;
- b. the relationship of problem gambling to other addictive behavior;
- c. techniques to be used when problem gambling is suspected or identified;
- d. techniques to be used to discuss problem gambling with patrons and advise patrons in regard to community, public and private treatment services;
- e. procedures designed to prevent serving alcohol to visibly intoxicated patrons;
- f. procedures designed to prevent persons from gambling after having been determined to be visibly intoxicated;
- g. procedures for the dissemination of written materials to patrons explaining the self-exclusion program;
- h. procedures for removing an excluded person, an underage individual or a person on the self-exclusion list from the gaming facility, including, if necessary, procedures that include obtaining the assistance of appropriate law enforcement personnel;
- i. procedures to prevent an excluded person or a person on the self-exclusion list from being mailed any advertisement, promotion or other target mailing after receiving notice from the commission that the person has been placed on the excluded person or self-exclusion list;
- j. procedures to prevent an individual under 21 years of age from receiving any advertisement, promotion or other target mailing;
- k. procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from directly accessing or receiving complimentary services, or other like benefits;
- l. procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from cashing checks or vouchers that require ID on gaming facility premises; and

- m. procedures to prevent an excluded person, an individual under 21 years of age or a person on the self-exclusion list from entering the casino floor.
2. Training and training materials will be updated as necessary to include current research and information on Responsible Gaming gaming and problem gambling.
3. del Lago may contract with the New York Council on Problem Gambling to use their training materials and to have their trainers conduct the training of del Lago Team Members. Additional training for Team Members will be conducted by either the General Counsel, Vice President of Legal Affairs and Compliance, the Vice President of Human Recourses or another individual as assigned with training and experience in Responsible Gaming training programs.
4. Team Members who have received training will be acknowledged with a Certificate of Completion upon completion of training.
5. Team Members are required to receive periodic reinforcement training no less than once every 12 months, starting with the year following the year in which the Team Member was hired. The date of the reinforcement training will be recorded in each Team member's personnel file.
6. Team Members will report suspected or identified problem gamblers to casino management and/or to the onsite Gaming Commission staff.
7. del Lago will collaborate with the New York Council on Problem Gambling to develop an in-house, Intranet-based or Internet-based Team Member training program to provide the training and reinforcement Responsible Gaming and Problem Gambling training. *(Training materials from the NYCPG are attached as Exhibit "A" to this Plan).*
8. del Lago will implement communication programs to help team members improve their understanding of Responsible Gaming and related policies and procedures. Briefs or articles which highlight Responsible Gaming education will be included regularly in team member newsletters and updates.
9. There may be on-site gambling treatment provider visits throughout the year including during Responsible Gaming Education Week.
10. Problem Gambling and related disorder treatment may be provided by Seneca County Mental Health to employees, if needed at no cost to the Team Members.



11. In addition to Responsible Gaming and Problem Gambling training, the following Team Members will be trained in Responsible Alcohol Service:

- a. All front of house food and beverage Team Members that participate in the serving of alcoholic beverages including all Servers and Bartenders
- b. All Security Staff
- c. All Valet Staff
- d. All Slot Attendants
- e. All Table Games Dealers
- f. Surveillance
- g. All Supervisors and above
- h. All Retail staff
- i. All Player Development and Club Representatives and Casino Hosts
- j. All Front Desk staff

12. Team Members, as noted above, that receive Responsible Alcohol Service training, are required to receive periodic reinforcement training at no less than once every 12 months, starting with the year following the year in which the Team Member was hired. The date of the reinforcement training will be recorded in each Team member's personnel file.

### **RGP-001-3 IMPLEMENTATION, MAINTENANCE AND PLAN KNOWLEDGE**

1. General Counsel at del Lago will be Responsible Gaming for reviewing, communicating changes, and ensuring effective implementation of all Responsible Gaming policies and procedures, however others in del Lago's leadership team will play an integral role in making sure del Lago sets high standards for Responsible Gaming practices.

### **RGP-001-4 IDENTIFYING PROBLEM GAMBLING BEHAVIOR**

1. del Lago Resort and Casino educates all Team Members regarding the signs, symptoms and procedures to be used to identify problem gambling behavior. Team Members are trained to recognize some of the potential behavioral, verbal, social, legal, economic and emotional characteristics that may indicate that a guest may have a gambling problem. The Team Member should follow the procedures set forth in the section of this Plan titled “*Reporting Compulsive or Problem Gamblers*” as set forth below

### RGP-001-5 LIMITING ACCESS TO MONEY

1. del Lago Resort and Casino will use a third party, check guarantee service, which pre-qualifies guests for a specific cash checking limit. The cashing of any check payable to an individual including but not limited to Social Security, payroll, unemployment insurance, disability, or public assistance will be prohibited.

### RGP-001-6 RESPONSIBLE GAMING GAMING RESOURCE CENTER

1. The Responsible Gaming Resource Center will provide guests with information on safer gambling practices as well as assistance and local referrals for help with gambling related problems. RGRC will be located within close proximity to the casino floor and will also be a resource for training and will include a private meeting room. Del Lago has entered into an agreement with Seneca County Mental Health Services to provide Problem Gambling, substance abuse and other counseling services to both our Team Members and our Guests. The County will use the RGRC as one available location for providing these services.

### RGP-001-7 REPORTING COMPULSIVE OR PROBLEM GAMBLERS

1. del Lago Resort and Casino educates all Team Members regarding the proper procedures for reporting possible problem gambling behavior to designated key Team Members or other supervisory Team Members. Reporting by Team Members will be oral reporting unless otherwise specified. All del Lago Resort and Casino Team Members are required to keep the reporting of suspected problem gambling behavior confidential.

2. If any Team Member has identified a person on the self-exclusion list, he/she will contact Security immediately. Security will proceed according to the procedures set forth in the section titled *“Preventing Excluded Persons from Gambling”*.
3. If any non-supervisory Team Member suspects a guest has a gambling problem, he/she will orally notify his/her supervisor with specific concerns regarding the guest’s behavior or verbal statements. The notification of concern to the supervisor should include (if possible) the guest’s name and the specific reasons for concern. The concerns should not be entered into the player tracking system.
4. Before reporting, Team Members should ask themselves:
  - a. Am I concerned?
  - b. Are there security or service issues involved?
  - c. Is my concern based on the guest’s statements and/or behavior?
5. A Supervisor or above will evaluate the facts and circumstances presented and make a determination if the guest should be approached. If an approach is warranted, a designated Supervisor or above will casually approach the guest to assess the situation. If the individual seems receptive, the designated Supervisor or above will attempt to suggest a conversation in a private setting. He/She will express concern and offer alternatives for assistance such as written materials explaining self-exclusion, problem gambling brochures and problem gambling treatment and assistance resources as set forth in the next section titled *Problem Gambling Information* and provide such information to individuals with suspected or known compulsive and problem gambling behavior. The privacy of the guest must always be protected.
6. No Team Member will approach any guest regarding problem gambling behavior on his/her own. These concerns must always be reported to a Supervisor or Security management.

## RGP-001-8 PROBLEM GAMBLING INFORMATION

1. The responsibility to create Problem Gambling material will reside with del Lago’s Marketing Department who will design the collateral, with review and approval by the General Counsel and property General Manager. Additionally, the NYSGC will review and approve all Problem

Gambling collateral materials to ensure consistency across all licensed properties.

2. del Lago Resort and Casino will provide printed materials, on various related topics, which will be available to all members of the public and to all Team Members. Relevant topics covered in these materials include, but are not limited to, Responsible Gaming and Problem Gambling, signs of problem gambling and options for help that are available. All printed material will contain the HOPELINE number and TEXT number and the link to the New York Council on Problem Gambling, OASES and NYGC/RPP websites.
3. All del Lago Resort and Casino Team Members will be trained on and be familiar with the location of the information and will be able to direct guests to the information.
4. On the backside of all del Lago Rewards Club Cards and on the backside of all ticket vouchers, del Lago Resort and Casino has printed the phrase Problem Gambling? Call 1-877-8HOPE-NY or text HOPENY (467369).
5. A Responsible Gaming and Problem Gambling information board will be present in the Team Member back of house area.
6. del Lago Resort and Casino will post signage as set forth in the section titled *Posting of Approved Signs and Materials*.
7. The following information will be available at the Responsible Gaming Gaming Resource Center (*Examples of these materials are included in Exhibit "B"*):
  - a. Responsible Gaming and Problem Gambling brochure
  - b. Self-Exclusion Program Brochure
  - c. Is Your Gambling Becoming a Gambling Problem
  - d. Underage Gaming
  - e. Problem Gambling Awareness Month
  - f. New York Problem Gambling Helpline number
  - g. New York Problem Gambling website
8. Security may provide the above referenced information pursuant to the section titled *Reporting Compulsive or Problem Gamblers*.

## RGP-001-9 RESPONDING TO GUEST REQUESTS FOR INFORMATION

1. Upon request, del Lago Resort and Casino will provide or direct guests to the location of printed material informing guests about problem gambling, Responsible Gaming gaming, the self-exclusion program and New York resources. If the guest requests, they will be escorted to the on-site Responsible Gaming Gaming Resource Center.
2. Requests for information are never entered into the player tracking system.

## RGP-001-10 KEEPING INDIVIDUAL PROBLEM GAMBLING CONFIDENTIAL

1. All del Lago Resort and Casino Team Members are required to keep the identity of an individual suspected of problem gambling confidential.
  - a. Except for the procedures set forth in the section titled *Reporting Compulsive or Problem Gamblers* and the section titled *Problem Gambling Information* Team Members will not discuss or disclose the identity of an individual that he/she suspects has a gambling problem other than to the appropriate management personnel.
  - b. Team Members may discuss the identity of such individuals with their supervisor or Security management; however, the guest's identity will never be discussed or disclosed to any other Team Member of del Lago Resort and Casino or any other individual unless directed to do so by their supervisor.

## RGP-001-11 TREATMENT SERVICES INFORMATION

1. del Lago Resort and Casino will make available upon request or direct guests to the location of printed materials that inform guests about problem gambling, Responsible Gaming gaming, the self-exclusion program and treatment options and will review and update these printed materials as necessary.

- a. del Lago Resort and Casino will post signage as set forth in the section titled *Posting of Approved Signs and Materials*.
- b. del Lago Resort and Casino will make printed information available at the Responsible Gaming Gaming Resource Center.
- c. On the backside of all del Lago Rewards Club 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, del Lago Resort and Casino will print and/or provide the phrase “Gambling Problem? Call 877-8HOPE-NY/HOPENY (467369)”

## RGP-001-12 LIST OF COMMUNITY AND STATE RESOURCES

1. del Lago Resort and Casino will make available upon request or escort the guests to the location of printed material that informs guests about New York resources and will review and update the printed materials as necessary.
2. del Lago Resort and Casino will make available the list of community and New York resources according to the section titled *Problem Gambling Information*, the section titled *Creating and Disseminating Material to Guests* and to inform them about New York resources available and upon request.
3. del Lago Resort and Casino makes this information available at the Responsible Gaming Gaming Resource Center.

## RGP-001-13 CERTIFICATION PROCESS TO VERIFY FOR COMPLETION OF TRAINING

1. del Lago Resort and Casino will educate all Team Members regarding problem gambling, the prohibition of underage gambling, prohibition of gambling by impaired guests, and the identification and ejection of excluded individuals. All Team Members of del Lago Resort and Casino will be trained in accordance with the Team Member training program. Certain Team Members, as designated in this policy will be trained in the Responsible Gaming service of alcohol. Team Members of specific departments will be trained in department-specific training

regarding policies and procedures as set forth in this Plan. All attendance and forms listed below may either be kept in paper or electronic formats.

2. Verification of attendance at initial training and annual reinforcement training regarding problem gambling, the prohibition of underage gambling, the prohibition of gambling by impaired guests and the identification and ejection of excluded individuals will be demonstrated on “sign-in” sheets or computer login which will be completed by the Team Member at each training session. This record of training attendance will be kept on file in the Human Resource office. All del Lago Resort and Casino Team Members receiving annual reinforcement training regarding Responsible Gaming and Problem Gambling (the prohibition of underage gambling, alcohol awareness and the identification and removal of excluded and self-excluded persons) will complete a Training Acknowledgement form when he/she receives training. These forms will also be kept on file in the Human Resources offices and may be captured and filed electronically.
3. Verification of Responsible Gaming service of alcohol training will be documented by an attendance/sign in sheet or computer login for all persons attending training. This record of training attendance will be kept on file in the Human Resources office and may be filed electronically.
4. Verification of departmental specific training regarding policies and procedures as set forth in this Plan will be documented on “sign-in” sheets or computer login which will be completed by the Team Member at the trainings. This record of training attendance will be kept on file in the Human Resources office and may be filed electronically.
5. Training Acknowledgement forms, for the initial and annual reinforcement training for problem gambling, will include the Team Member’s printed name and Team Member signature and the date of training. The signature may be physical or digital as a unique login.

## RGP-001-14 PREVENTING UNDERAGE GAMBLING

1. Persons under the age of 21 (“underage”) are prohibited from gambling or traversing the gaming floor.

2. del Lago Resort and Casino will prominently post signage within 50 feet of each entrance and exit of the gaming floor related to underage gambling as set forth in the section titled *Posting of Approved Signs and Materials*.
3. Any Team Member who suspects that an individual on the gaming floor and/or engaging in gambling activities is underage will immediately notify Security who will follow the security procedures related to underage gambling as set forth in the Security Department duties and responsibilities below.
4. Specific departments have duties and responsibilities as set forth below:
  - a. **Security Department** - Security is Responsible Gaming for the enforcement and reporting of operational efforts, which relate to the prevention and identification of underage gambling.
    - i. Before entering the gaming floor, all guests who appear under the age of 35 will be asked by Security Officers to produce valid photo identification, defined as any unexpired government-issued document with the individual's photograph and personal information which is intended to be used as identification.
    - ii. Security will require all guests who are on the gaming floor and who appear to be under the age of 35 to produce valid photo identification to verify their age/identification.
    - iii. Upon identification by Security, or notification by any Team Member, of an underage individual who is on the gaming floor, gambling or not, Security officers will approach, engage, and verify the age of the guest in question by requesting verifiable government issued photo identification as outlined above.
    - iv. If the guest is underage, or cannot produce verifiable government issued photo identification, Security will contact the NYSGC Agent on duty and contact Surveillance immediately. The underage individual will be escorted off the gaming floor or away from the entrance as appropriate by Security. If the underage individual was engaging in gambling activities, Security will "cash out" any winnings if necessary before escorting the individual off the gaming floor. Security will confiscate all the



gambling funds (chips, slot tickets and/or jackpot winnings), and Security will document the amount and submit the confiscated winnings to the Casino Cage for receipt. All forfeited amounts shall be deposited into the commercial gaming revenue fund. Once the incident has been resolved, Security will notify the appropriate NYSGC staff immediately via email or phone or other means of any such incident.

- v. The Security Department will complete a formal eviction form for the individual, who will be advised that subsequent violations will result in an arrest for trespass. A Security Department Team Member will document this event on an incident report and forward the report to the Vice President of Security. Security will ensure that the incident report includes identification of all Team Members involved and the location on the gaming floor where the underage person was found, and ultimately forwards a copy of the report to the Assistant General Manager, General Counsel and to the Gaming Commission.
- b. **Surveillance Department** - Surveillance is Responsible Gaming for the electronic monitoring of, among other areas, all gaming in the property. The Surveillance personnel assigned to Surveillance duties are Responsible Gaming for monitoring these areas for guests appearing to be underage who are on the gaming floor and/or are engaged in gambling activities.
- i. Upon identification, or notification, of an individual suspected to be underage, the Surveillance personnel will notify Security, who will follow the Security procedures related to underage gambling detailed above.
  - ii. Surveillance personnel will immediately track the individual on the gaming floor to advise Security personnel if the individual had engaged in gambling activities.
  - iii. The Surveillance Agent or above will document the incident and notification efforts on an incident report.
- c. **Slot Department** - Every member of the slot department is Responsible Gaming for visually monitoring guest activity on the gaming floor.

- i. If any member of the slot department receives notification of an individual who is on the gaming floor and/or engaged in gambling activities and is suspected to be underage, they should immediately notify Security and Surveillance who will follow the security procedures related to underage gambling as set forth above.
  - ii. Security will document the incident and notification efforts on an incident report.
- d. **Table Games Department** - Every member of the table games department is Responsible Gaming for visually monitoring guest activity on the gaming floor.
  - i. If any Dealer or above identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gambling activities and is suspected to be underage, they should immediately notify their Supervisor who will follow the procedures related to underage gambling as set forth above.
  - ii. Security will document the incident and notification efforts on an incident report.
- e. **Cashier's Cage** - If the guest appears to be under the age of 35, Cage Cashiers will request a valid Government issued photo ID as proof of age and will check the identification against the player tracking system before processing check cashing privileges, cashing of vouchers, cashing of gift certificates/cards, customer deposits and the preparation of jackpot payout slips or any other transaction.
  - i. If a guest cannot or will not produce a valid government issued photo ID showing proof of age, the Cashier will not proceed with the transaction. The Cage Cashier will immediately notify Security.
  - ii. Security will document the incident and notification efforts of the Cage on an incident report.
- f. **Marketing Department** - If the guest appears to be under the age of 35 when redeeming slot points at any del Lago outlet or at the cage/promotions desk, the club member must provide a valid government issued photo ID.

- i. In addition, individuals under the age of 21 are not allowed to access the gaming floor and are not permitted to use the self-redemption kiosks or any gaming device.
  - ii. No complimentary services or other like benefits will be provided to an individual under the age of 21.
  - iii. Upon identification, or notification of an individual suspected to be under 21, del Lago Players Club representatives will immediately notify their immediate supervisor or above. The Supervisor will notify Security and Surveillance who will follow the Security procedures related to underage gambling set forth above. If the Supervisor is not on duty, the attendant will go directly to Security who will follow the security procedures related to underage gambling set forth above. Any other marketing Team Members should immediately notify Security.
  - iv. Security will document the incident and notification efforts on an incident report.
- g. Food and Beverage Department -** Although Security Officers will be asking anyone who appears to be 35 years of age or under for identification, all Team Members, but specifically Food and Beverage staff who have guest contact may question any guest, whether on or off the gaming floor, who is attempting to purchase alcohol. In addition, Food and Beverage staff who have guest contact will notify Security if a guest appears to be under 35 years of age and is on the gaming floor or consuming or attempting to consume alcohol. Food and Beverage personnel with guest contact will notify Security who will follow the Security procedures related to underage gambling set forth above. A Security Officer or supervisor will document the incident and notification efforts on an incident report.

## RGP-001-15 PREVENTING EXCLUDED PERSONS FROM GAMBLING

1. del Lago Resort and Casino prohibits excluded persons from gambling.
2. del Lago Resort and Casino will maintain electronic copies of the most current version of the Exclusion List as updated by Security and published by the NYSGC and distribute the list to the appropriate personnel. The list distribution and appropriate personnel include:

- a. Receipt of the list, as well as additions, deletions, changes and other updates, acknowledged by the General Counsel or Vice President of Legal Affairs and Compliance.
  - b. The General Counsel or Vice President of Legal Affairs and Compliance will disperse the list and additions, deletions, changes and other updates to the del Lago Cage and Rewards Club Managers who will make any necessary updates to the player database on a daily basis. The list will also be distributed to Security Management, Slots Management, Table Games Management, Surveillance Management, Cage Management, Marketing Management, the Assistant General Manager and to Internal Audit.
3. An electronic copy of the exclusion list will be kept in the security office and the surveillance room. Team Members of Security and Surveillance will review the information and photographs of the excluded persons once a month at a minimum, to become familiar with the appearance, identity and physical description of each excluded person.
4. Any del Lago Resort and Casino Team Member who suspects that an individual is on the Exclusion List will immediately notify his/her supervisor, Surveillance and Security. A Security Officer or Supervisor will follow the Security procedures related to Excluded Persons set forth below.
5. Specific departments have duties and responsibilities that are set forth below:
  - a. **Security Department** - Upon notification and/or visual identification of a person suspected to be on the exclusion list, Security Officers will immediately contact the Security Supervisor or above for comparison and consultation of physical features/photographs consistent with those identified on the exclusion list published by the NYSGC and entered into the player tracking system. If the comparison yields a match, Security will verify the identification of the individual and will notify the NYSGC agent on duty, if applicable, and contact Surveillance immediately. The individual will be escorted off the gaming floor or away from the entrance as appropriate by Security. If the individual was engaging in gaming activities, Security will “cash out” any winnings, if necessary, before initiating the escort. Security will confiscate all the winnings,

and Security will document the amount and submit the confiscated gambling funds (chips, slot tickets and/or jackpot winnings) to the Casino Cage for receipt. All forfeited amounts shall be deposited into the commercial gaming revenue fund. Once the incident has been resolved, Security will notify the appropriate NYSGC staff immediately via email or phone or other means of any such incident.

- i. Security will contact local law enforcement to have them evicted and/or arrested for trespass.
  - ii. The involved Security Department personnel will document this event on the incident report and forward to the Security Director or his/her designee.
  - iii. The Security Officer or above handling the eviction will ensure that the incident report includes identification of all Team Members involved and the location on the gaming floor, and will forward the report to the Security Director or their designee for review and signature, and the Security Director or above forwards a copy of the report to the EVP-GM and General Counsel.
  - iv. Security will complete the necessary reports, logbooks, and paperwork within twenty-four (24) hours of the incident. However, in no case will the completion and forwarding of the details of the incident to the Vice President of Security be greater than twenty-four (24) hours from the occurrence of the incident.
- b. Surveillance Department - Surveillance personnel are Responsible Gaming for the electronic monitoring of among other areas, all gaming areas, all entrances and exits, and Food and Beverage areas in the property. Surveillance will maintain a copy of the Exclusion list in the Surveillance. Room. The Security department and Surveillance personnel assigned to Surveillance duties are Responsible Gaming for becoming familiar with the photographs of the excluded persons and for monitoring these areas for excluded persons.
- i. Upon identification, or notification, of an individual suspected to be on the Exclusion List, the Surveillance personnel will notify Security who will follow the security procedures related to excluded persons as set forth above.

- ii. Surveillance personnel will immediately track the individual on the gaming floor to advise a NYSGC Agent if the individual had engaged in gambling activities.
  - iii. Surveillance Agent or supervisor will document the incident and notification efforts on an incident report and will provide a copy of the Surveillance footage and timeline to the NYSGC Agent in person or via email, fax or other means with a copy of the incident report.
- c. **Slot Department** - All Slot Attendants and supervisors are responsible for visually monitoring guest activity on the casino floor. Slot department personnel will review the exclusion which is available on a daily basis via the Statewide Self Exclusion database. If any Slot Attendant or above identifies, or receives notification of an individual who is on the gaming floor and/or engaged in gambling activities that is suspected to be on the exclusion list, the Slot Attendant will immediately notify Security and Surveillance who will follow the Security procedures related to excluded persons set forth above and document the notification efforts of the slot department on an incident report.
- d. **Cashier's Cage** - All Cage Cashiers or supervisors will request valid government issued photo identification and will check the identification against the player tracking system before processing check cashing privileges, customer deposits, the preparation of jackpot payout slips for prizes over \$600 and/or other significant transactions.
  - i. If the guest is flagged as an excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify their supervisor.
  - ii. The supervisor will notify Security who will follow the Security procedures related to excluded persons.
  - iii. The supervisor will issue a receipt for confiscated gambling funds (chips, slot tickets and/or jackpot winnings), redeeming any vouchers that were confiscated (making and keeping copies of the vouchers). All forfeited amounts shall be deposited into the commercial gaming revenue fund.
  - iv. Security 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 NYSGC and placed on the Exclusion list, will have their name, address, and date of birth (which will be entered into the statewide self-exclusion database by the various casinos Security departments upon intake and provided to the casinos on a daily basis by the NYSGC) entered in the player tracking system within two (2) business days after the day notice is received by the del Lago Resort and Casino. In addition, the account will be flagged and any slot points and complimentary services that may be due to the guest as a result of gaming play at del Lago Resort and Casino will be permanently deleted, and the individual will not be permitted to redeem them or to participate in any bonuses, awards or promotions.
- i. Marketing personnel will require a valid government issued photo identification or government issued passport before registering an individual in the player tracking system and issuing a del Lago Rewards Club Card.
  - ii. A Rewards Club Card will not be issued to an individual who is flagged in the player tracking system as being self-excluded.
  - iii. No complimentary services or other like benefits will be provided to an individual on the voluntary or involuntary exclusion list.
  - iv. No advertising, mail promotions, emails relating to property gaming promotions or the like will be sent to an individual on the exclusion list.
  - v. Complimentary services, awards and drawings, and targeted mail may be offered/sent to non-Rewards Club members or any person 21 years of age older that are not participating in the New York Voluntary Exclusion Program or those persons that appear on the NYSGC Exclusion List.
  - vi. Upon identification or notification of an individual suspected to be on the exclusion list, Rewards Club Representatives or supervisors will immediately notify their supervisor, who will notify Security. Security will follow the Security procedures related to excluded persons. If a supervisor is not immediately available the representative will go directly to Security. All other Marketing personnel, such as Hosts, will immediately notify Security who will

follow the Security procedures related to excluded persons.

- vii. Security will document the incident and notification efforts of the marketing department on an incident report.

## RGP-001-16 PREVENTING SELF-EXCLUDED PERSONS FROM GAMBLING

1. del Lago Resort and Casino prohibits self-excluded persons from gambling.
2. The Commission shall provide for the establishment of a list of persons who have chosen voluntarily to be excluded from participation in all gaming activities and to be prohibited from collecting any winnings or recovering any losses at gaming facilities.
3. A person requesting placement on the self-exclusion list shall submit to del Lago staff or the NYSGC a completed Request for Self-Exclusion form. The submission may be given to a Responsible Gaming – trained staff member at del Lago or the NYSGC staff during regular hours of operation. Persons who are unable to travel to either location due to employment, financial or medical reasons may request, in writing, a reasonable accommodation in a manner or at a site and time designated at the sole discretion of the commission secretary.
  - a. A request for self-exclusion from gaming activities shall include the following identifying information:
    - i. name, including any aliases or nicknames;
    - ii. date of birth;
    - iii. address of current residence or mailing address if different from residence;
    - iv. telephone number;
    - v. social security number
    - vi. height, weight, gender, race, hair color, eye color and any other physical characteristic that may assist in the identification of the person; and
    - vii. a copy of a current government-issued photo identification such as a driver’s license or passport.



- b. Any person requesting self-exclusion on-site or at the NYSGC shall have his or her photograph taken upon submission of the request.
  - c. The length of self-exclusion requested by a person shall be one of the following:
    - i. one year;
    - ii. three years
    - iii. five years; or
    - iv. lifetime.
4. Each person requesting self-exclusion shall provide:
- a. a waiver and release that shall release and forever discharge the State of New York, the commission and its employees and agents and all gaming facility licensees and their employees and agents, from any liability to the person requesting self-exclusion and his or her heirs, administrators, executors and assignees for any harm, monetary or otherwise, that may arise out of or by reason of any act or omission relating to the request for self-exclusion or any subsequent request for removal from the self-exclusion list, including:
    - i. the processing or enforcement of the self-exclusion request;
    - ii. the failure of a gaming facility licensee to withhold gaming privileges from, or restore gaming privileges to, a self-excluded person;
    - iii. permitting a self-excluded person to engage in gaming activity in a gaming facility while on the list of self-excluded persons; and
    - iv. disclosure of the information contained in the self-exclusion request or list.
    - v. the signature of the person submitting the request for self-exclusion, indicating acknowledgment of the following statement:

I certify that the information that I have provided above is true and accurate. I am aware that my signature below authorizes the facilities listed above to authorize my exclusion from such

properties until the expiration of the exclusionary period I have requested and only after I have requested and been granted readmission. I understand that if I am found within any of the properties listed above after having been voluntarily excluded, I will be subject to arrest for criminal trespass if I refuse to be escorted from the property. Further, I authorize the facilities listed above as well as the New York State Gaming Commission to send a copy of my request and all encrypted identifying information to each of the above listed properties located within New York State.

I am voluntarily requesting that I be excluded from all video lottery gaming; horse race wagering, including wagers placed at track-side and through Off Track Betting (OTB) facilities; and pari-mutuel wagering activities conducted in New York State. I have read, understand and agree to the Waiver and Release included with this request. I am aware that my signature authorizes the properties listed above to restrict my video lottery gaming, horse racing and pari-mutuel activities for the duration of the exclusion period I selected and until such time as my name has been removed from the self-exclusion list in response to a written request from me to terminate my voluntary self-exclusion. I authorize a copy of this request for self-exclusion, and any subsequent request for readmission, to be sent to the New York State Gaming Commission and to all of the facilities listed above which are located in New York State.

I am aware and agree that during my self-exclusion, if I engage in gaming activity at any of the properties listed above, I may not collect any winnings or recover any losses resulting from the gaming activity. And, I understand that any money or thing of value obtained by me from or owed to me by any of the properties listed above as a result of wagers made by me while on the self-exclusion list shall be forfeited.

I understand that if I am found at any of the properties listed above while my name is on the self-exclusion list and I refuse to be escorted from such facility, I may be subject to arrest and

prosecution under all applicable laws, including trespass pursuant to N.Y. Penal Law Section 140.05.

I fully and completely understand all provisions of this agreement and request and sign it voluntarily, freely and knowingly.

- b. The commission shall document a description of the type of identification credentials examined containing the signature of a person requesting self-exclusion, and whether said credentials included a photograph or general physical description of the person.
  - c. The commission shall document the signature of the commission employee authorized to accept a self-exclusion request, indicating that the signature of the person on the request for self-exclusion appears to agree with that contained on the requester's identification credentials and that any photograph or physical description of the person appears to agree with the requester's actual appearance.
  - d. Each self-excluded person shall acknowledge that no gaming facility shall allow such person to redeem any points or complimentaries earned by such person as of the time such person completes the request for placement on the self-exclusion list. Points or complimentaries refer to credits earned by a person under the terms of *del* Lago's marketing program and shall include, without limitation, food vouchers or coupons, chip or free play vouchers or coupons, hotel complimentaries or any other such noncash benefit owing to such person. The terms and conditions of the player club shall remain in effect during the period of self-exclusion.
  - e. Each person requesting self-exclusion for one, three five years or a lifetime shall be advised that if such person is found violating the terms and conditions of the exclusion period, in addition to any other penalty that may otherwise be imposed, *del* Lago or the NYSGC, depending on where the individual originally submitted his/her paperwork, shall revise the start date of such person's self-exclusion period to correspond with the date such violation occurred.
5. *del* Lago Resort and Casino will prominently post signage within 50 feet of all entrances and exits to the property indicating that a person who is on the self-exclusion list will be subject to arrest for trespassing

(relating to criminal trespass) if the person is on the gaming floor or engaging in gambling activities.

6. The prohibition against allowing self-excluded persons on the gaming floor 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. *del* Lago Resort and Casino's Security department and the NYSGC have received prior notice.
  - c. Access to the gaming floor is limited to the time necessary to complete the individual's assigned duties.
7. The NYSGC maintains the official self-exclusion list using data input daily by casino staff throughout the state and electronically notifies *del* Lago Resort and Casino of additions, deletions, changes and other updates to the list. The notice provided by the NYSGC to the Compliance Officer and General Counsel 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
  - f. Physical description of the person, including height, weight, gender, race, 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 *del* Lago staff if intake is handled on-site or by NYSGC staff if intake is handled at the Commission's location.
  - h. All decisions regarding readmission of a self-excluded person will be made by the individual casinos and that information will be updated in the statewide self-exclusion database by each casino on a daily basis.
8. *del* Lago Resort and Casino will maintain electronic copies of the self-exclusion list provided by the NYSGC and distribute to the appropriate personnel and will maintain electronic 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. All changes to the self-exclusion database will be handled by each casino property and uploaded to the statewide self-exclusion database on a daily basis.
  - b. The Compliance Officer will disperse the list and additions, deletions, changes and other updates to the del Lago Vice President of Marketing or their designee who will make any necessary updates to the player database on a daily basis. Team Members of the Security and Surveillance department will review the information and photographs and physical description of each excluded and self-excluded persons frequently to become familiar with the appearance and physical description of each excluded person.
9. Team Members are required to keep the identity of an individual on the self-exclusion list confidential. Notwithstanding the forgoing, del Lago may disclose the name of, and information about a voluntarily excluded person to gaming affiliates for purposes of excluding such persons from receiving information or being contacted by the affiliate.
10. A copy of the self-exclusion list is kept in the Security Office, and Surveillance Room. Team Members of Slots, Table Games, Security and Surveillance will review the information and photographs of the self-excluded persons frequently to become familiar with the appearance, identity and physical description of each self-excluded person.
11. The Vice President of Marketing or their designee will “flag” and disable the player tracking system account of a self-excluded individual on a daily basis. In addition, any slot points, complimentary, and Free Play that may be due to the guest as a result of gambling play at del Lago Resort and Casino will be permanently 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 Vice President of Marketing or their designee will create an account and will simultaneously “flag” and disable the new account within two (2) business days after the day notice is received by del Lago Resort and Casino.
12. The Senior Vice President of Marketing or their designee will remove the “flag” and enable the player tracking system account of an individual who has been removed from the self-exclusion list on a daily basis.

13. Self-excluded individuals will not be allowed in nongaming areas of the del Lago Resort and Casino.
14. Team Members will direct an individual inquiring about self-exclusion to Security who will do the intake and explain the self-exclusion program if the guest requests to exclude on-site. The NYSGC will conduct the intake for any individual who chooses to self-exclude at the NYSGC offices. All contact with Team Members and Security will be kept confidential.
15. del Lago Resort and Casino will train our Team Members to identify and prevent self-excluded guests from playing slot machines or table games.
  - a. del Lago Resort and Casino will train its Team Members who have guest contact in procedures designed to prevent a self-excluded individual from gambling.
  - b. Self-excluded guests will be denied entry to the gaming floor by Security Officers stationed at all entrances to the gaming floor to prevent the guest from gambling. The procedures outlined below will be followed to ensure that a self-excluded guest is denied entry.
16. Specific departments have duties and responsibilities for which they will be trained as set forth below:
  - a. **Security Department** - Upon notification or visual identification of a person suspected to be on the self-exclusion list, Security will immediately contact a Security Supervisor for comparison of physical features/photographs with those identified on the copy of the self-exclusion list published by the NYSGC and entered into the player tracking system. If a comparison match is indicated, Security personnel will notify the NYSGC agent on duty and Surveillance. If it is determined that the guest is on the self-excluded list, a Security Officer or supervisor will explain to the guest that they are not permitted to enter the gaming floor. If located on the gaming floor, the individual will be escorted off the gaming floor by Security and/or the NYSGC Agent. If the individual was engaging in gambling activities, Security and/or the NYSGC Agent on duty will “cash out” any winnings before initiation of the escort. The individual will be escorted to the NYSGC offices for processing (including arrest for trespass).

Security and/or the NYSGC Agent on duty will confiscate all the gambling funds (chips, slot tickets and/or jackpot winnings) and Security will document the amount and submit the confiscated funds to the Casino Cage for receipt. All forfeited amounts shall be deposited into the commercial gaming revenue fund.

- i. The Security Officer or supervisors will document this event on an incident report and forward to the Director of Security, and will immediately inform a NYSGCstaff member in person or via email.
  - ii. Security will ensure that the incident report includes identification of all Team Members involved and the location of the point of identification on the gaming floor, and will forward the report to the Security Director for review and signature. Security will forward a copy of the report to the NYSGCvia email.
  - iii. The Security Officer or supervisors handling the incident will complete the necessary reports, logbooks, and paperwork within 24 hours of the incident.
  - iv. Security will notify the Compliance Officer within 48 hours of the incident.
  - v. Surveillance personnel will document the incident and notification efforts in the Surveillance Daily Log.
- b. **Surveillance Department** - Surveillance is Responsible Gaming for the electronic monitoring of all gaming areas, all entrances and exits on property and the Food and Beverage areas in the property. Surveillance personnel are responsible for becoming familiar with the photographs of the self-excluded persons and for monitoring these areas for self-excluded persons.
- i. Upon identification, or notification, of an individual suspected to be on the Self-Exclusion List, the Surveillance personnel will notify Security who will follow the Security procedures related to self-excluded persons as set forth above.
  - ii. Surveillance personnel will immediately track the individual on the gaming floor to advise NYSGC Agent if the individual had engaged in gambling activities.

- iii. The Surveillance Department will document the incident and notification efforts on an incident report and will provide a copy of the Surveillance footage and timeline to the NYSGC Agent with a copy of the incident report.
- c. **Slot Department** - All Slot Attendants or supervisors are Responsible Gaming for the visual monitoring of guest activity on the gaming floor. Slot department personnel will review the Self-Exclusion list on a frequent basis.
  - i. If any Slot Attendant or supervisor identifies, or receives notification, of an individual who is on the gaming floor and/or engaged in gambling activities and is suspected to be on the self-exclusion list, the Slot Department Team Member will immediately notify Security and Surveillance who will follow the security procedures related to self-excluded persons as set forth above.
  - ii. Security will document the incident and notification efforts on an incident report.
- d. **Cashier's Cage** - All Cage Cashiers will request verifiable government-issued photo identification and will check the identification against the player tracking system before processing check cashing privileges, customer deposits, the preparation of jackpot payout slips, credit and/or other types of procedures.
  - i. If a guest cannot produce valid government issued photo identification or if the individual is flagged as a self-excluded person in the player tracking system, the cashier will not proceed with the transaction and will immediately notify a supervisor.
  - ii. The Cage Cashier or supervisor will notify Security and Surveillance who will follow the security procedures related to self-excluded persons as set forth above.
  - iii. The Cage Cashier or supervisor will issue a receipt for confiscated gambling funds (chips, slot tickets and/or jackpot winnings), redeeming any vouchers that were confiscated (and making and keeping copies of the vouchers) and provides a receipt for the funds until the funds are transferred to the commercial gaming revenue fund.



- iv. Security 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 name and other identifiable information such as address and date of birth (as recorded during intake) entered into the player tracking system by the Senior Vice President of Marketing or their on a daily basis. In addition, any slot points, and complimentaries that may be due to the guest as a result of gaming play at del Lago Resort and Casino will be deleted, and the individual will not be permitted to redeem or to participate in any bonuses, awards or promotions. Marketing personnel require valid government issued photo identification before registering an individual in the player tracking system and issuing a del Lago Rewards Club Card. A Rewards Club member may choose to have his/her mail sent to an address other than the address on the identification used for the player's account. In the event a Rewards Club member with an alternate mailing address (i.e. P.O. Box) chooses to self-exclude, his or her alternate address will also be deleted to avoid receipt of marketing and other promotional mailings.
  - i. A Rewards Club Card will not be issued to an individual who is flagged in the player tracking system as being self-excluded.
  - ii. No complimentary services or other like benefits will be provided to an individual on the self-exclusion list.
  - iii. No gaming junket solicitations, targeted mailings, telemarketing promotions, player club materials or other promotional materials relating to gaming activities will be sent to an individual on the self-exclusion list.
  - iv. Upon identification, or notification of an individual identified to be on the self-exclusion list, the Team Member will immediately notify their supervisor. The supervisor will notify Security who will follow the Security procedures related to underage gambling set forth above. If a supervisor is not immediately available, the Team Member will go directly to Security who will follow the Security procedures related to self-excluded persons set forth above. Player Development Team Members will immediately notify Security and Surveillance who will

follow the Security procedures related to self-excluded persons.

- v. Security will document the incident and notification efforts on an incident report.

## RGP-001-17 PREVENTING IMPAIRED GUESTS FROM GAMBLING

1. del Lago Resort and Casino will train our Team Members to identify and prevent impaired guests from playing slot machines or table games and will assist in ensuring a safe departure or accommodations for the guest.
2. del Lago Resort and Casino will train its Team Members who have guest contact in procedures designed to prevent serving alcohol to visibly impaired guests and will establish these procedures designed to prevent guests from gambling after having been determined to be visibly impaired.
3. Visibly impaired guests will be denied entry to the gaming floor by Security Officers stationed at all entrances to the gaming floor to prevent the guest from gambling. The procedures outlined below will be followed to ensure that the impaired guest is provided with safe transportation or accommodations.
4. Specific departments have duties and responsibilities as set forth below:
  - a. Security Department - upon visual observation or notification of any guest identified, or suspected to be visibly impaired, Security will contact Surveillance for coverage, providing location and a description of the guest.
  - b. Once Surveillance has confirmed that they have coverage, Security will approach the guest, perform a status check, and make a determination if the guest appears to be visibly impaired.
  - c. The Surveillance personnel will document the incident and notification efforts in the Surveillance Daily Log.
  - d. If Security determines the guest is visibly impaired, a Security Officer or supervisor will explain to the guest that they appear to be visibly impaired and advise the guest they are not permitted to enter the gaming floor. If located on the gaming floor, Security will escort the guest from the gaming floor to prevent

the impaired guest from playing. Any unfinished alcoholic beverage will be removed from the impaired guest to prevent any further consumption of alcohol.

- e. Security will remain with the impaired guest until arrangements for their safe departure have been secured. If the guest refuses to give up their alcoholic beverage, refuses to leave the gaming floor or becomes unduly disruptive, security will notify the local law enforcement for further handling of the guest. If the impaired guest is interested in leaving the property, Security department personnel will discuss driving arrangements, or overnight accommodations with the guest. If the guest attempts to leave the property by driving a motor vehicle visibly impaired, Security will immediately notify local law enforcement.
  - f. If the guest has Valet parked their vehicle, The Valet Team Member will notify Security department personnel who will discuss driving arrangements, or overnight accommodations with the guest. If the guest attempts to leave the property by driving a motor vehicle visibly impaired, Security will immediately notify local law enforcement.
  - g. Security will document the incident and interventions provided to the impaired guest on an incident report.
5. Surveillance Department - Upon visual observation of a guest who appears to be visibly impaired, Surveillance personnel assigned to Surveillance duties will immediately contact Security to engage the procedures set forth above. The Surveillance personnel will document the incident and notification efforts on an incident report.
6. Slot Department - Upon observation of a guest who appears to be visibly impaired, the Slot Team Member will immediately notify his/her supervisor who will observe the guest and, based upon this observation, may contact Security. Security will follow the procedures set forth above. Security will document the incident and notification efforts on an incident report.
7. Table Game Departments - Upon observation of a guest who appears to be visibly impaired, the Table Game Team Member will immediately notify his/her supervisor who will observe the guest and, based upon this observation, may contact Security. Security will follow the procedures set forth above. Security will document the incident and notification efforts on an incident report.

8. Food and Beverage Department - Although Security Officers will be asking anyone who appears to be 30 years of age or under for identification, Food and Beverage staff who have guest contact have the right to request proof of age of any guest attempting to purchase alcohol. In addition, a Food and Beverage Team Member who has guest contact will notify his/her supervisor if a guest appears to be visibly impaired. Food and Beverage personnel with guest contact will notify their supervisor or Security for alcohol service suspension/refusal of service once they have determined that a guest is showing signs of impairment. Security will follow the procedures set forth above. Security will document the incident and notification efforts on an incident report.
9. Valet Department - Valet personnel with guest contact will notify Security if they suspect that a guest is impaired and is attempting to obtain his/her car to leave the property. Upon notification by Valet of an impaired guest, Security will follow the procedures set forth above. Security will assist in the attempted refusal to return a parked car to an impaired guest. However, if the guest insists on departing the property in their own vehicle, Security will immediately notify local law enforcement. Security will document the incident and notification efforts on an incident report.

## RGP-001-18 OUTREACH PROGRAMS

del Lago Resort and Casino offers the following outreach programs to its Team Members and other individuals:

### **New York State Council on Problem Gambling**

100 Great Oaks Blvd., Suite 126  
Albany, NY 12203  
Phone: 518-867-4084  
Fax: 518-867-4087  
council@nyproblemgambling.org

### **New York State Office of Alcohol and Substance Abuse Services**

Call:	1-877-8HOPE-NY	New York City Office
		501 7th Avenue
Text:	HOPENY (467369)	New York, NY 10018-5903

**Albany Office**  
1450 Western Avenue  
Albany, NY 12203-3526

**General Information:**  
Phone: 518-473-3460  
E-Mail: [communications@oasas.ny.gov](mailto:communications@oasas.ny.gov)

**Gamblers Anonymous**

**Upstate Area**

Albany Hotline Number: (518) 292-0414  
Buffalo Hotline Number: 855-2CALLGA (855-222-5542)  
Niagara Falls Number: 855-2CALLGA (855-222-5542)  
Rochester Hotline Number: 855-2CALLGA (855-222-5542)  
Syracuse Hotline Number: 855-2CALLGA (855-222-5542)  
Watertown/Massena Hotline Number: 855-2CALLGA (855-222-5542)

**National Council on Problem Gambling**

Call: 1-800-522-4700  
Text: 1-800-522-4700  
Chat: [ncpgambling.org/chat](https://ncpgambling.org/chat)

730 11th St, NW, Ste 601 Washington, DC 20001  
Phone 202.547.9204  
Fax 202.547.9206

[ncpg@ncpgambling.org](mailto:ncpg@ncpgambling.org)

**Seneca County Mental Health Department**

Phone: 315-539-1985

31 Thurber Drive  
Waterloo, NY 13165

## RGP-001-19 ADVERTISING/POSTING OF APPROVED SIGNS/ MATERIALS

1. del Lago Resort and Casino will post the required Responsible Gaming verbiage throughout the property and on information offered to the public. This signage conveys information in plain, clearly understandable language. The locations for the signs are set forth below. 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 Senior Vice President of Marketing, in consultation with the General Manager and General Counsel, is responsible for reviewing all signs and materials offered to the public. Additionally, the NYSGC will review and approve all Problem Gambling collateral materials to ensure consistency across all licensed properties. The del Lago plan is as follows:
  - a. del Lago Resort and Casino will post signs bearing the gambling assistance message with one of the following messages: "Gambling Problem? Call 1-877-8HOPE-NY" or Gaming Problem? Text HOPENY (467369). The signs will be prominently posted at the following locations:
    - i. Within 50 feet of each entrance and exit.
    - ii. Above or below the cash-dispensing opening on all automated teller machines, automated gaming voucher and coupon redemption machines and other machines that dispense cash to patrons.
    - iii. on all gaming devices;
    - iv. in all gaming facility employee break areas;
    - v. in the player club location or locations;
    - vi. In restrooms both in the front and back of house;
    - vii. in or near cage areas; and
    - viii. in any other location, as the commission may require.
  - b. Gamblers Anonymous information will be prominently displayed in the RGRC and back of house.

- c. del Lago Resort and Casino will prominently post the gambling assistance message on signage located at all gaming floor entrances and exits.
  - d. del Lago Resort and Casino will print the gambling assistance message on all marketing or advertising materials that are offered to the general public, including signs, billboards, print, radio, email, website, and television advertisements.
  - e. del Lago Resort and Casino will post signs within 50 feet of all entrances and exits to the property indicating that “A person who is on the self-exclusion list will be subject to arrest for trespassing (relating to criminal trespass) if the person is on the gaming floor or engaging in gaming activities.” del Lago Resort and 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.
  - f. del Lago Resort and Casino advertisements will not use or depict individuals who are, or appear to be under 21 years of age.
2. del Lago Resort and Casino will discontinue as expeditiously as possible the use of a particular advertisement upon receipt of written notice from the Commission that the Commission has determined that the use of the particular advertisement in, or with respect to, the State could adversely impact the public or the integrity of gaming.
  - a. del Lago Resort and 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.
3. Advertisements shall contain a problem gambling assistance message comparable to one of the following:
  - a. If you or someone you know has a gambling problem, help is available. Call (877-8HOPE-NY) or text HOPENY (467369);
  - b. Gambling Problem? Call (877-8HOPE-NY) or text HOPENY (467369); or
  - c. (3) any other message approved in writing by the commission.

4. For signs, direct mail marketing materials, posters and other print advertisements, the height of the font used for the problem gambling assistance message will be the greater of:
  - a. the same size as the majority of the text used in the sign, direct mail marketing material, poster or other print advertisement; and
  - b. two percent (2%) of the height or width, whichever is greater, of the sign, direct mail marketing material, poster or other print advertisement.
  - c. The size and color of the font used for the gambling assistance message in signs, direct mail marketing materials, posters and other print advertisements will be predominately displayed and not hidden in the message.
  - d. For billboard or outdoor advertising, the height of the font used for the gambling assistance message will be at least five percent (5%) of the height or width, whichever is greater, of the face of the billboard.
  - e. For video and television, the problem gambling assistance message will be visible for either:
    - i. the entire time the video or television advertisement is displayed, in which case the height of the font used for the problem gambling assistance message must be at least two percent (2%) of the height or width, whichever is greater, of the image that will be displayed; or
    - ii. from the first time a table game, table game device, slot machine, associated equipment or gaming facility name is displayed or orally referenced, and on a dedicated screenshot visible for at least the last three seconds of the video or television advertisement. If the gaming facility licensee elects to use this option, the height of the font used for the problem gambling assistance message displayed:
      1. during the advertisement must be at least two percent (2%) of the height or width, whichever is greater, of the image that will be displayed; and



2. on the dedicated screen shot must be at least eight (8%) percent of the height or width, whichever is greater, of the image that will be displayed.
5. For websites, including social media sites and mobile phone applications:
    - a. the problem gambling assistance message will be posted on each webpage or profile page and on any gaming-related advertisement posted on the webpage or profile page;
    - b. the height of the font used for the problem gambling assistance message will be at least the same size as the majority of the text used in the webpage or profile page; and
    - c. for advertisements posted on the webpage or profile page, the height of the font used for the problem gambling assistance message will comply with subparagraph two (2) of this paragraph.

EXHIBIT “A”  
TRAINING MATERIALS

EXHIBIT “B”

**BROCHURES AND POSTERS**

