

Exhibit X.A.4 – Self-Exclusion Policies

Submit as Exhibit X.A.4. a description of the exclusion policies that will be available for Gaming Facility patrons and employees, including the process to notify individuals of the availability of self-exclusion, the steps that will be taken to assist those who request exclusion and steps that will be taken to assure that excluded patrons are identified before gaining access to the gaming floor.

Description of the self-exclusion policy

Capital View Casino & Resort will offer a voluntary self-exclusion program that allows patrons to remove themselves from gambling at our gaming facility and which focuses on offering self-excluded patrons help and support. CVCR views self-exclusion as a tool to help people in their efforts to overcome gambling problems. The CVCR self-exclusion program is based on an assistance model; a method based on delivering individual assistance by responding to individuals in a helpful way, working through the registration process in a respectful, timely manner, providing information about counseling options including financial, self-help and treatment referrals, and encouraging individuals to take advantage of the assistance available. Members of our management team met with the Responsible Play Partnership, an alliance between the New York State Gaming Commission, Office of Alcohol and Substance Abuse Services (OASAS) and the New York Council on Problem Gambling, to address the technical and administrative issues that need to be resolved to launch of a statewide self-exclusion program. We expect new casino facilities will be required to utilize a Commission-approved uniform self-exclusion request form, and casino and VLT facilities will share their respective self-exclusion data resulting in a statewide self-exclusion list that applies to all gaming facilities across the state. We were pleased to participate in this effort, look forward to participating in a statewide self-exclusion program, and pledge to follow current and future self-exclusion regulation promulgated by the Commission. At a minimum we plan to offer a self-exclusion program similar in nature to those in existence at VLT operations across the state including one-, three-, and five-year exclusions.

Raising awareness of the availability of self-exclusion

The self-exclusion program will be well advertised at the gaming facility and explained through informational brochures, on the CVCR website, and on posters and signs throughout our facility. CVCR employees will be well educated on the self-exclusion program and will assist patrons looking for further information or are in need of directions as to where to go to register for the program. Persons not on property who may be interested in utilizing the self-exclusion program will obtain an application form by calling CVCR or by going online at Capitalviewcasino.com. We expect to be expanded through the future development of a statewide self-exclusion program promulgated by the Commission.

Steps taken to assist those who request self-exclusion

The process of self-exclusion will require individuals to meet in-person with staff specifically trained to handle the self-exclusion registration process. These staff members will be trained to provide responsive, respectful, and professional service. The self-exclusion registration process will be carried out in a comfortable setting that protects the self-exclusion applicant's privacy and will not require the individual to enter the casino floor if they are coming from off property.

The staff person will clearly explain the registration process, options, breach consequences and follow-up procedures. Persons applying for self-exclusion will be required to provide identification that includes a signature and either a photograph or physical description. When the completed form is filed, the individual will be photographed and told that photo, and other identifying information, will be displayed to employees in non-public areas to assist with enforcement of their self-exclusion request. Beginning with the opening of new casino properties, individuals applying for self-exclusion will also be informed that new surveillance



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technologies may be employed that will detect them if they enter the casino property and they will be subject to arrest for trespassing.

Importantly, support options are clearly explained, the benefits of receiving support and/or treatment are reviewed, and individuals motivated to seek treatment are invited to use the phone in the office to call 1-877-8-HOPENY to begin the process of accessing treatment services. At the conclusion of the meeting, written materials are provided for the individual to take home and view in a less pressured environment. During the individual's ban period they are removed from all marketing systems and are no longer able to accumulate player's club points or other benefits.

Steps that will be taken to assure that excluded patrons are identified before gaining access to the gaming floor

We understand that a significant proportion of individuals placed on the self-exclusion list manifest a gambling disorder and by definition suffer from impaired control over their decisions. Although catching individuals that break their self-exclusion agreement may result in an arrest or trespassing fine, the goal is not to punish people but to help them. Methods used to deter and identify self-excluded individuals from accessing the gaming floor will include:

- **Signage.** Highly visible signs will be posted at all entrances to the facility indicating that, "Persons on the self-exclusion list will be subject to arrest for trespassing". These signs are meant to provide pause and a final reminder to persons on the self-excluded list from going beyond driving to the facility to entering the premises for the purpose of gambling.
- **Employee Vigilance.** In addition to security staff assigned to monitoring patrons and being on the lookout for persons on the self-exclusion list, employees who work on the gaming floor are instructed to bring to the attention of security any person they know or suspect to be banned from gaming. Our security and surveillance teams will regularly review the photos of the individuals on the self-exclusion list and be on the constant lookout for their attempts to enter the facility.
- **Emerging Technology.** While it is still not perfected, a number of technology-based systems are being developed to assist in identifying specific individuals in a crowd. Facial recognition is one example of a technology-based tool that is showing some promise and may, in the future, play a role in a casino's ability to detect and deter self-excluded patrons from entering. Another developing tool that we are watching is Automatic Number Plate Recognition (ANPR). ANPR is a surveillance method that uses optical character recognition on images to read vehicle registration plates.

Promotional material opt-out

All promotional emails and mail communication will contain information on how to remove oneself from CVCR's marketing lists. Additionally, CVCR will ensure that any patron for any reason may request from our trained player's club desk personnel to be excluded from receiving any and all promotional mail, email, or other communications.

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Self-limiting allowable credit

As a responsible gaming tool, CVCR will offer all patrons seeking casino credit the opportunity to set their credit limit below what they may qualify for and/or to set a maximum allowable credit line and/or self-exclude from being eligible to receive house credit. Information about self-limiting allowable credit will be provided directly on the credit application and will be verbally reviewed with the patron by a credit officer. The self-limiting credit program is designed for those responsibly gambling guests desiring external control over their access to casino credit lines in order to provide them with a tool to keep their gambling expenditures within their limits. Casino credit will not be approved if at the time of request the patron presents as judgmentally compromised as indicated by self-identifying as a problem gambler, presenting as visibly intoxicated, or display behaviors clearly indicating a compromised mental state.

Exhibit X.A.5 – Treatment and Prevention

Submit as Exhibit X.A.5. a description of plans to coordinate with local providers to facilitate assistance and treatment for those with gambling-related problems and plans to develop prevention programs targeted toward vulnerable populations.

Capital View Casino & Resort believes we have an important, but not isolated, role in minimizing the potential harm of gambling. Government, science, industry, mental health and addiction providers, and gaming consumers must all take part to most effectively minimize harm caused or exacerbated by gambling. Furthermore, we must work together through collaboration and coordinated efforts. CVCR will actively seek to develop relationships with local providers to facilitate assistance and treatment for those with gambling-related problems and is committed to developing prevention programs targeted toward vulnerable populations.

Community relationships

Developing community relationships and coordinating with local treatment and prevention providers is a tenet of CVCR corporate social responsibility (CSR) philosophy and strategy. As we make plans to expand our casino operations in New York State, we are furthering the development of a Corporate Social Responsibility Committee (CSR Committee) that among other functions will serve as a body that interfaces with community leaders and local providers to better understand community concerns, needs, and opportunities for collaborative initiatives and programs. Our parent companies have a long history of supporting and interacting with non-profit and assistance organizations within our host communities across the country and look forward to bringing that same philosophy to East Greenbush.

Plans for future coordination and collaboration

As we expand into other areas of New York State, we plan to further coordinate and collaborate with local providers and state agencies to improve support for problem gamblers, their concerned significant others, and to promote responsible gaming. We welcome any opportunity to participate in problem gambling and/or responsible gaming forums, conferences, and meetings organized by Responsible Play Partnership or any of its three members; the New York State Gaming Commission, Office of Alcohol and Substance Abuse Services (OASAS), and the New York Council on Problem Gambling. We applauded the efforts of the Responsible Play Partnership, will assist the Partnership when called upon, and will be committed to following any regulation that may result from the Partnership's efforts.

One of the tools we plan to utilize to remain engaged with broader efforts to address problem gambling and responsible gambling is the New York Responsible Gambling Hub. The New York Council on Problem Gambling established the Responsible Gambling Hub in an effort to regularly communicate with New York Gaming Association member facilities and their staff. We plan to use this web-based hub to serve as a problem and responsible gambling research and resource directory and to remain up to date by regularly accessing the Hub's news directory.

Coordination and collaboration with gambling treatment program

The citizens of New York State are fortunate have a publicly funded problem gambling treatment and prevention system. In State Fiscal Year 2013, the New York State Office of Alcoholism and Substance Abuse Services (OASAS) received an allocation of \$2,235,000 to support problem gambling treatment services and problem gambling prevention services.

Two OASAS-funded problem gambling treatment programs are located within 45 miles of our proposed new casino at East Greenbush. Just across the Hudson River from our proposed site is Family and Children's Services, located in Albany, where outpatient problem gambling treatment services are offered.