



**MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #226**

October 12, 2017
10:00 a.m.

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA
October 12, 2017**

Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the Massachusetts Gaming Commission. The meeting will take place:

**Thursday, October 12, 2017
10:00 a.m.**

**Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA**

PUBLIC MEETING - #226

1. Call to order
2. Approval of Minutes
 - a. September 28, 2017 – VOTE
3. Administrative Update – Ed Bedrosian, Executive Director
 - a. General Update
 - b. Fiscal Year 2017 Budget Closeout – D. Lennon, Chief Finance and Accounting Officer
4. Research and Responsible Gaming – Mark Vander Linden, Director
 - a. Plainridge Park Casino Operation, Economic Impact Report – Dr. R. Volberg, SEIGMA (Social and Economic Impacts of Gambling in Massachusetts) Principal Investigator and R. Motamedi and T. Peake, UMASS Donahue Institute
 - b. Updated General Population Survey Report – Dr. R. Volberg, SEIGMA (Social and Economic Impacts of Gambling in Massachusetts) Principal Investigator
5. Workforce, Supplier and Diversity Development – Jill Griffin, Director
 - a. MGM Workforce Development Plan Update – M. Murren, Vice President, Human Resources – MGM Springfield and Wanda Smith-Gispert, Vice President for Talent and Workforce Development – MGM Regional Operations
6. Ombudsman – John Ziemba
 - a. Local Community Mitigation Advisory Committee Appointments – VOTE



Massachusetts Gaming Commission

7. Legal Division, Catherine Blue, General Counsel
 - a. 205 CMR 146 Table Games Equipment – VOTE
 - b. 205 CMR 138 – Gaming Day and Treatment of Unsecured Funds Amendments – Initial Review
 - c. Plainridge Park Casino – Review of Outstanding Requests for Additions to Non-Disclosure Agreement – VOTE

8. Investigations and Enforcement Bureau – Karen Wells, Director
 - a. Penn National Gaming Qualifier – VOTE

9. Commissioner's Updates
 - a. Gaming Stakeholders Economic Development Presentations – Commissioner Stebbins
 - i. Bristol Community College
 - ii. Bunker Hill Community College
 - iii. Mass Cultural Council
 - iv. Metro North Regional Employment Board
 - v. Towns of Plainville, Foxborough and Wrentham
 - vi. Greater Boston Convention and Visitors Bureau
 - vii. Metropolitan Area Planning Council

10. Other business – reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that on this date, this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to: regs@sec.state.ma.us, melissa.andrade@state.ma.us.

10/10/17
DATE



Stephen A. Crosby, Chairman

Date Posted to Website: October 10, 2017 at 10:00 a.m.



Massachusetts Gaming Commission

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: September 28, 2017– 9:30 a.m.

Place: Mass Mutual Center
1277 Main Street – Meeting Rooms 1 & 2
Springfield, MA

Present: Chairman Stephen P. Crosby
Commissioner Gayle Cameron
Commissioner Lloyd Macdonald
Commissioner Bruce Stebbins
Commissioner Enrique Zuniga

**Time entries are linked to
corresponding section in
Commission meeting video**

Call to Order

See transcript page 2

9:30 a.m. Chairman Crosby called to order the 225th Commission meeting.

Approval of Minutes

See transcript pages 2-3

Commissioner Macdonald moved for the approval of the Commission meeting minutes of September 14, 2017, subject to corrections for typographical errors and other nonmaterial matters. Motion seconded by Commissioner Cameron. Motion passed unanimously.

Ombudsman

See transcript pages 3-100

Ombudsman Ziemba presented on the Northampton Community Mitigation Fund Reserve Request. The City of Northampton would like to use its Community Mitigation Fund Reserve to develop a marketing and advertising plan to attract patrons of MGM Springfield to the City of Northampton. Mr. Ziemba stated that the Commission could approve \$35,000 of the \$100,000 reserve to create the plan and have the City of Northampton return for approval of the balance of the reserve

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(\$65,000) for implementation of the plan, or the Commission can approve the entire award now. The Commission discussed the options and decided that it was preferable to award the entire amount now to expedite the plan and its implementation.

Commissioner Stebbins moved that the Commission authorize the use of the full \$100,000 reserve fund now and require staff to enter into a grant contract and obviously review recommendations and next steps as the study process moves forward. Motion seconded by Commissioner Zuniga. Motion approved unanimously.

Mr. Ziemba stated that the team from MGM Springfield is here to present a status update on the MGM Springfield project. Mr. Ziemba further stated that the Commission requested an update on the project especially in light of the City of Springfield's approval of the 95% design.

Mike Mathis, President, MGM Springfield introduced his team and advised the Commission that MGM is growing by about 20 employees a month and will be moving into their new offices at the site at year's end. Mr. Mathis also stated that Mayor Sarno will be joining him at the meeting shortly.

Mr. Mathis walked the Commission through the site plan. He stated that Focus Springfield will be staying in its location for now. MGM is thinking about a redesign of the entrances to the Mass Mutual Center. Mr. Mathis stated the MGM is in discussion with a salon operator to operate a salon to complement MGM's spa at the hotel. Another retail location will be tenanted by a jewelry concept and that operator will be announced later.

Mr. Mathis explained that the Starbucks has been moved from the previously shown location so that MGM can expand the poker room. MGM finds that table game play is increasing among younger players. MGM will expand the poker room to 23 tables by moving into the space formerly described as the Starbucks space. Starbucks will be moved into the hotel lobby. The outdoor space that was attached to Starbucks will remain and will be attached to the poker room. It will be used as an outdoor lounge and smoking area. Mr. Mathis stated MGM has commitments for some other locations that will be announced later. He stated that MGM is in discussions with a national operator for the cinema and that the cinema will feature a recliner seat experience.

Mayor Sarno joined the Commission meeting and was welcomed by the Commissioners. Mayor Sarno stated that MGM's 95% design was accepted and he thanked the MGM and city team who worked on it. Mayor Sarno also discussed the importance of the MGM project to Springfield and thanked the Commission for coming to Springfield.

Mr. Mathis continued his presentation and described the challenges faced in renovating the armory building. It will be renovated so that it can be programmed

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for different uses while MGM is continuing to talk with potential future tenants. Brian Packer, MGM Vice President Construction/Development further explained the renovations to the armory building.

Mr. Packer presented the project budget update. There is approximately a \$95 million increase. This increase is driven by three categories: increased estimates; trade buyouts; and church/armory/ garage valet costs. Mr. Packer stated that the hotel podium is 98% committed. The buyout number does not include signage or the cinema and retail fit out. This will be addressed once agreements are reached with the tenants. Mr. Packer further reported on community commitments and stated that he works with Joe Delaney of the Commission to identify commitments. There is a robust system to track these commitments and Mr. Packer will report back on them in 1-2 months.

Alex Dixon, General Manager, MGM Springfield, provided an update on MGM's relationship with PVTA. He stated that they were working on trolley programming and bus ridership. He expects an agreement on the trolley should come together in the first quarter of 2018. Mr. Dixon stated that the trolley is more geared toward moving visitors around Springfield while bus routes are an indicator of where workers come from.

Mr. Dixon also reported on the relationship with the lottery. Progress was made on where the lottery terminals will be located and the relationship is off to a good start.

Sarah Moore, MGM Vice President, Brand Marketing & Retail announced that MGM will be partnering with Kringle Candle Co. for a new location in the church building. Ms. Moore also announced a new partnership with the Springfield Museums to create a "cabinet of curiosities". This partnership will allow MGM Springfield to exhibit certain items made in Springfield from the collections of Springfield museums. Mike Mathis stated that the partnership shows how MGM can bring new visitors to existing attractions and experiences.

Marikate Murren, MGM Vice President Human Resources announced that MGM will partner with Head Start on the child care center. She shared a rendering of the child care center with the Commission. Janice Santos, Executive Director of Head Start described the partnership with MGM and stated that it allows a focus on parents and children working together. Mr. Mathis stated that the child care center building is LEED platinum and a net zero building.

11:15 The Commission took a short recess and Commissioner Macdonald left the meeting.
11:25 The Commission reconvened.

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Workforce, Supplier and Diversity Development

See transcript pages 101-134

Director Griffin presented an update on the western Massachusetts gaming school. She introduced Dr. John Cook, President, Springfield Technical Community College; Dr. Christina Royal, President, Holyoke Community College and Jeffrey Hayden, Vice President of Community and Business Services, Holyoke Community College.

Dr. Royal announced that Springfield Technical Community College (“STCC”) and Holyoke Community College (“HCC”) are the Massachusetts Casino Career Training Institute (“MCCTI”) under the umbrella of TWO –Training Workforce Options. MCCTI has come to an understanding with MGM regarding staffing and funding of a gaming school with a goal of providing high quality training and workforce development for the MGM workforce. Dr. Cook reported that he is excited and happy to be part of this partnership. Dr. Royal thanked the community partners who helped get everyone to this point.

Jeff Hayden reported on the details and schedule – the gaming school application is underway; equipment will be in soon; and recruitment will begin in conjunction with MGM. The gaming lab will open in February 2018. Mr. Hayden showed the floor plan of the school and described the funding sources. He stated that the maximum capacity of the school is 240 students. The cost to each student is expected to be around \$598 for 240 hours of training. Without MGM in-kind contributions the cost would be around \$3000 per student. MGM will provide the instructors who will include some shift managers who will work at MGM Springfield. 1500 applicants are expected, of which 500 will start training and this number will net out to about 400 candidates for employment. Next steps include finalizing the gaming school application and hiring an executive director. MGC Executive Director Bedrosian stated that MGC is committed to turning the gaming school application around as quickly as possible.

Racing Division

See transcript pages 134-142

Dr. Lightbown presented on the Mass Thoroughbred Breeders Association’s request for approval for fall races at Finger Lakes consisting of up to 9 races and for approval of 1 additional race at a mid-Atlantic track. Dr. Lightbown also stated that there is 1 stake race at Suffolk Downs this coming Monday. There is money available for purses for these additional fall races. Mr. George Brown, Chairman of the Mass Thoroughbred Breeders Association thanked the Commission for their time and approval of races run in the spring and summer.

Commissioner Cameron moved that the Commission approve the request of the Massachusetts Thoroughbred Breeders Association to run up to 9 restricted Mass Bred races at Finger Lakes and 1 stakes race at a mid-Atlantic track as well as the

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stakes race at Suffolk Downs this coming weekend. Motion seconded by Commissioner Stebbins. Motion approved 4-0, Commissioner Macdonald having earlier left the meeting.

Executive Director Bedrosian reminded the Commission that Suffolk Downs races this weekend and that applications for racing licenses (track) are due by the end of this week.

12:10 p.m. The Commission took a recess for lunch.

12:50 p.m. The meeting resumed

Commissioner's Updates

See transcript pages 142-242

Chairman Crosby turned the meeting over to Commissioner Stebbins for the presentation of 7 economic development strategies/proposals for use of the Gaming Economic Development Fund. The Commission will hear presentations at upcoming commission meetings as well and all of the presentations will be rolled up into a white paper for submission to the legislature for its consideration.

Mary Kay Wydra, President, Greater Springfield Convention and Visitors Bureau presented a proposal to expand marketing efforts to maximize the impact of the hospitality industry in the region.

Anne Burke, President, Western Mass Economic Development Council, presented a proposal that focuses on bringing residents of the City of Springfield who are not currently in the workforce into the workforce and would create a branding and marketing plan to retrain existing workers and attract new workers.

Timothy Brennan, Executive Director, Pioneer Valley Planning Commission presented 3 proposals - increasing public transportation in off hours; creation of a fund that would make small loans or investments in small businesses; and creation of a study for a regional lock-up for the southern portion of the Pioneer Valley.

Rick Kos, Mayor of Chicopee, Jack Benjamin, Assistant City Planner and Mike Bolton, President/CEO of Westover Municipal Airport presented a proposal for 24/7 air service and increasing commercial air service to the Westover Municipal Airport.

David Cruise, President and CEO, Regional Employment Board of Hampden County presented a proposal to promote programs and services to youth aged 16-24 to create job readiness.

Jeffrey Hayden, Vice President of Community and Business Services, Holyoke Community College presented a proposal for assessment and gap training; creation of an occupational portal; and a marketing effort to employers to let them know the value of the Massachusetts workforce.

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Springfield Regional Chamber submitted a proposal. Commissioner Stebbins briefly described the proposal, which is included in the Commission materials.

Commissioner Stebbins updated the Commission on a meeting he had with the Secretary of Elder Affairs regarding Senior Financial Exploitation. He stated that he also spoke with the Secretary of Banking. Both Secretaries have training materials on this topic that they would like to present to commission staff.

2:30 p.m. *Having no further business, a motion to adjourn was made by Commissioner Cameron. Motion seconded by Commissioner Zuniga. Motion passed 4 – 0, Commissioner Macdonald having earlier left the meeting.*

List of Documents and Other Items Used

1. Massachusetts Gaming Commission, Notice of Meeting and Agenda dated September 25, 2017
2. Massachusetts Gaming Commission, Draft Meeting Minutes, September 14, 2017
3. Massachusetts Gaming Commission Memorandum from Ombudsman Ziemba dated September 25, 2017 and City of Northampton 2017 Community Mitigation Fund Planning Project Application Use of Reserve
4. MGM Project Update dated September 28, 2017
5. Massachusetts Gaming Commission Memorandum from Director of Racing Dr. Alexandra Lightbown regarding Massachusetts Thoroughbred Breeders Association Request for fall racing dated September 25, 2017
6. Presentation – Western Mass Economic Development Council dated September 17, 2017
7. Presentation – Greater Springfield Convention and Visitors Bureau dated September 15, 2017
8. Presentation – Pioneer Valley Planning Commission dated September 14, 2017
9. Presentation – Regional Employment Board of Hampden County
10. Presentation – Training & Workforce Options
11. Presentation – City of Chicopee/Westover Metropolitan Airport dated September 15, 2017
12. Presentation – Springfield Regional Chamber dated September 26, 2017
13. MGM Springfield Letter dated September 15, 2017

/s/ Catherine Blue

Catherine Blue, Assistant Secretary

No Documents

MASSACHUSETTS GAMING COMMISSION

MEMORANDUM

To: Chairman Crosby and Commissioners Cameron, Macdonald, Stebbins and Zuniga
From: Derek Lennon, CFAO
Date: 10/12/2017
Re: Fiscal Year 2017 (FY17) Closeout

Summary:

The Massachusetts Gaming Commission spent \$872K less in the Gaming Control Fund in FY17 than actual revenue collected. Final spending for the Gaming Control Fund was \$26.3M. The Commission collected revenue of \$31.68M in FY17, however \$4.5M of that was slot fees for FY18 that were received in FY17. Consequently final FY17 revenues after balancing forward FY18 slot fees totaled \$27.2M, resulting in the aforementioned \$872K surplus which will reduce the FY18 assessment on licensees.

FY17 Closeout:

The Massachusetts Gaming Commission approved an initial FY17 Gaming Control Fund budget of \$27.17M, requiring a \$22.45M assessment on licensees. After the first three quarterly updates of FY17, the revised budget Gaming Control Fund budget projected spending of \$27.07M, and revenue of \$27.17M. The final spending and variances to budget by budget area in the Gaming Control Fund are below:

Budget Group	Approved Budget	FY17 Spending	Variance to Budget--	
			Over/(Under)	% Variance
MGC Regulatory Cost	\$ 18,484,154.63	\$ 18,174,166.74	\$ (309,987.89)	-1.68%
EE--Indirect Costs	\$ 1,648,870.20	\$ 1,507,283.80	\$ (141,586.40)	-8.59%
Office of Attorney General	\$ 2,376,844.36	\$ 2,362,666.85	\$ (14,177.51)	-0.60%
Research and Responsible				
Gaming/Public Health Trust Fund	\$ 4,485,535.33	\$ 4,184,730.30	\$ (300,805.03)	-6.71%
ISA to ABCC	\$ 75,000.00	\$ 89,129.58	\$ 14,129.58	18.84%
Gaming Control Fund Total Costs	\$ 27,070,404.52	\$ 26,317,977.27	\$ (752,427.25)	-2.78%
Revenue	Projections	FY17 Receipts	Variance to Projections--	
			Over/(Under)	% Variance
Gaming Control Fund	\$ 27,171,694.52	\$ 27,190,473.29	\$ 18,778.77	0.07%

Balance in Gaming Control Fund--
Positive/(Negative)

\$ 872,496.02

At the close of FY17, final spending in the Gaming Control Fund was \$26.3M, approximately \$752.4K (2.8%) less than the projected spending of \$27.07M. MGC's revenue collections in FY17 for exceeded its approved budget by \$120K, which resulted in a surplus of \$872.5K in the Gaming Control Fund. The surplus is unrestricted revenue and therefore will result in a decrease to the FY17 assessment on licensees.

Below is a table with additional detail regarding spending by budget group and revenues by type of revenue for the FY17 the Gaming Control Fund:

2017 Row Labels	Budget Projections		Actuals To Date Total	Variance to Budget-- Over/(Under)	% Variance
	Initial Projection	Current Budget (Initial+Apvd Adjmts)			
10500001--Gaming Control Fund					
MGC Regulatory Cost					
AA REGULAR EMPLOYEE COMPENSATION	\$ 6,119,738.87	\$ 6,007,876.07	\$ 5,742,543.96	\$ (265,332.11)	-4.42%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 64,000.00	\$ 71,900.00	\$ 55,092.06	\$ (16,807.94)	-23.38%
CC SPECIAL EMPLOYEES	\$ 100,000.00	\$ 106,862.80	\$ 78,221.20	\$ (28,641.60)	-26.80%
DD PENSION & INSURANCE RELATED EX	\$ 2,208,428.60	\$ 2,173,258.60	\$ 2,050,012.17	\$ (123,246.43)	-5.67%
EE ADMINISTRATIVE EXPENSES	\$ 590,725.64	\$ 592,825.64	\$ 490,914.28	\$ (101,911.36)	-17.19%
FF PROGRAM, FACILITY, OPERATIONAL SUPPLIES	\$ -	\$ -	\$ 69,284.20	\$ 69,284.20	
GG ENERGY COSTS AND SPACE RENTAL	\$ 1,221,982.62	\$ 1,221,982.62	\$ 1,255,383.70	\$ 33,401.08	2.73%
HH CONSULTANT SVCS (TO DEPTS)	\$ 1,254,603.14	\$ 1,274,603.14	\$ 1,556,369.88	\$ 281,766.74	22.11%
JJ OPERATIONAL SERVICES	\$ 3,091,685.78	\$ 3,129,185.78	\$ 3,041,708.12	\$ (87,477.66)	-2.80%
KK Equipment Purchase	\$ -	\$ 8,400.00	\$ 16,045.54	\$ 7,645.54	91.02%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 29,683.80	\$ 29,683.80	\$ 18,375.06	\$ (11,308.74)	-38.10%
NN NON-MAJOR FACILITY MAINTENANCE REPAIR	\$ -	\$ -	\$ 40,537.27	\$ 40,537.27	
PP STATE AID/POL SUB/OSD	\$ 225,000.00	\$ 175,000.00	\$ 88,278.89	\$ (86,721.11)	-49.55%
TT PAYMENTS & REFUNDS POL ISA	\$ 50,000.00	\$ 50,000.00	\$ 7,457.00	\$ (42,543.00)	-85.09%
UU IT Non-Payroll Expenses	\$ 3,639,596.18	\$ 3,642,576.18	\$ 3,663,943.41	\$ 21,367.23	0.59%
MGC Regulatory Cost Subtotal:	\$ 18,595,444.63	\$ 18,484,154.63	\$ 18,174,166.74	\$ (309,987.89)	-1.68%
EE--Indirect Costs	\$ 1,648,870.20	\$ 1,648,870.20	\$ 1,507,283.80	\$ (141,586.40)	-8.59%
Office of Attorney General					
ISA to AGO	\$ 1,904,540.60	\$ 1,904,540.60	\$ 1,607,818.73	\$ (296,721.87)	-15.58%
TT Reimbursement for AGO 0810-1204(up to \$449,364)	\$ -	\$ -	\$ 156,153.67	\$ 156,153.67	
AGO State Police	\$ 472,303.76	\$ 472,303.76	\$ 598,694.45	\$ 126,390.69	26.76%
Office of Attorney General Subtotal:	\$ 2,376,844.36	\$ 2,376,844.36	\$ 2,362,666.85	\$ (14,177.51)	-0.60%
Research and Responsible Gaming/Public Health Trust Fund					
AA REGULAR EMPLOYEE COMPENSATION	\$ 232,465.30	\$ 232,465.30	214,382.09	(18,083.21)	-7.78%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 6,000.00	\$ 6,000.00	5,529.15	(470.85)	-7.85%
CC SPECIAL EMPLOYEES	\$ -	\$ -	2,112.00	2,112.00	
DD PENSION & INSURANCE RELATED EX	\$ 81,758.03	\$ 81,758.03	74,681.83	(7,076.20)	-8.66%
EE ADMINISTRATIVE EXPENSES	\$ 8,825.00	\$ 8,825.00	18,964.36	10,139.36	114.89%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 500.00	\$ 500.00	-	(500.00)	-100.00%
HH CONSULTANT SVCS (TO DEPTS)	\$ 1,437,500.00	\$ 1,427,500.00	1,448,933.77	21,433.77	1.50%
JJ OPERATIONAL SERVICES	\$ -	\$ 20,000.00	10,865.63	(9,134.37)	-45.67%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 40,000.00	\$ 40,000.00	\$ 265.30	(39,734.70)	-99.34%
PP STATE AID/POL SUB	\$ 2,130,000.00	\$ 2,130,000.00	\$ 1,925,153.91	(204,846.09)	-9.62%
UU IT Non-Payroll Expenses	\$ 65,000.00	\$ 65,000.00	\$ 15,506.60	(49,493.40)	-76.14%
ISA to DPH	\$ 473,487.00	\$ 473,487.00	\$ 468,335.66	(5,151.34)	-1.09%
Research and Responsible Gaming/Public Health Trust Fund Subtotal:	\$ 4,475,535.33	\$ 4,485,535.33	\$ 4,184,730.30	\$ (300,805.03)	-6.71%
ISA to ABCC	\$ 75,000.00	\$ 75,000.00	\$ 89,129.58	\$ 14,129.58	18.84%
Gaming Control Fund Total Costs	\$ 27,171,694.52	\$ 27,070,404.52	\$ 26,317,977.27	\$ (752,427.25)	-2.78%

Revenues	Revenue Projections		Actuals Total	Variance to Budget-- Over/(Under)	% Variance
	Initial Projection	Current Budget (Initial+Apvd Adjmts)			
Gaming Control Fund Beginning Balance 0500		\$ 987,501.13	\$ 987,501.13	\$ -	0.00%
Phase 1 Collections (restricted) 0500		\$ -	\$ -	\$ -	
Phase 1 Refunds 0500		\$ -	\$ -	\$ -	
Phase 2 Category 1 Collections (restricted) 0500		\$ -	\$ 59,197.85	\$ 59,197.85	
Region C Phase 1 Investigation Collections 0500	\$ -	\$ -	\$ -	\$ -	
Region C Phase 2 Category 1 Collections 0500		\$ -	\$ -	\$ -	
Grant Collections (restricted) 0500	\$ 50,000.00	\$ 50,000.00	\$ -	\$ (50,000.00)	-100.00%
Region A slot Machine Fee 0500	\$ 1,945,200.00	\$ 1,945,200.00	\$ 3,870,838.69	\$ 1,925,638.69	98.99%
Region B Slot Machine Fee 0500	\$ 1,800,000.00	\$ 1,800,000.00	\$ 3,600,000.00	\$ 1,800,000.00	100.00%
Slots Parlor Slot Machine Fee 0500	\$ 750,000.00	\$ 750,000.00	\$ 1,519,561.31	\$ 769,561.31	102.61%
Gaming Employee License Fees (GEL) 3000	\$ 35,000.00	\$ 35,000.00	\$ 48,375.00	\$ 13,375.00	38.21%
Key Gaming Executive (GKE) 3000	\$ 5,000.00	\$ 5,000.00	\$ 12,000.00	\$ 7,000.00	140.00%
Key Gaming Employee (GKS) 3000	\$ 15,000.00	\$ 15,000.00	\$ 14,400.00	\$ (600.00)	-4.00%
Non-Gaming Vendor (NGV) 3000	\$ 31,000.00	\$ 31,000.00	\$ 36,000.02	\$ 5,000.02	16.13%
Vendor Gaming Primary (VGP) 3000	\$ 30,000.00	\$ 30,000.00	\$ 45,000.00	\$ 15,000.00	50.00%
Vendor Gaming Secondary (VGS) 3000	\$ 45,000.00	\$ 45,000.00	\$ -	\$ (45,000.00)	-100.00%
Gaming School License (GSB)	\$ -	\$ -	\$ 100.00	\$ 100.00	
Gaming Service Employee License (SER) 3000	\$ 15,000.00	\$ 15,000.00	\$ 15,525.00	\$ 525.00	3.50%
Subcontractor ID Initial License (SUB) 3000		\$ -	\$ -	\$ -	
Temporary License Initial License (TEM) 3000		\$ -	\$ -	\$ -	
Veterans Initial License (VET) 3000		\$ -	\$ -	\$ -	
Transfer of Licensing Fees to CMF 0500		\$ -	\$ -	\$ -	
Assessment 0500	\$ 22,450,494.52	\$ 21,462,993.39	\$ 21,403,227.60	\$ (59,765.79)	-0.28%
Misc 0500		\$ -	\$ 73,946.69	\$ 73,946.69	
FY18 Slot Assessment Collected in FY17			\$ (4,495,200.00)	\$ (4,495,200.00)	
Grand Total	\$ 27,171,694.52	\$ 27,171,694.52	\$ 27,190,473.29	\$ 18,778.77	0.07%
Balance in Gaming Control Fund--Positive/(Negative)			\$ 872,496.02		

Appendix A to this document is the budget to actual spending and revenue for fiscal year 2017 for the Racing Oversight and Control Trust Fund and the Gaming Control Fund. Appendix C shows spending compared to budget for each division within the MGC.

Assessment on Licensees:

205 CMR 121.00 describes how the commission shall assess its operational costs on casino licensees including any increases or decreases that are the result of over or under spending. CMR 121.05(2) deals with the case where annual assessments are in excess of actual expenditures. This section gives the MGC the discretion to either return excess revenue or credit excess revenue to the assessments in the subsequent fiscal year. The revenue must be credited or returned in the same proportion it was initially assessed. In keeping with prior year practice, the MGC Office of Finance and Administration is recommending that the balance forward credit the FY18 assessment. The result of the balance forward of \$872.5K in unrestricted revenue from FY17 will decrease the FY18 assessment from \$24.45M to \$23.58M. The chart below shows how the FY17 assessment was apportioned, and what the excess revenue will mean to the licensees' FY18 assessments. I will be providing the first FY18 quarterly budget update at the public meeting on October 26th after that meeting we will be sending out our next quarterly bill for assessments which will reflect the credit for the FY17 balance in the Gaming Control Fund.

FY17 Assessment Percents for Distribution of Balance Forward								
FY17 Balance Forward						872,496.02		
	Slots	Table Games	Table Gaming Positions*	Total Gaming Positions*	Percentage of Gaming Positions	FY17 Credit		
MGM	3,000	100	600	3,600	38.99%	\$340,191.23		
Wynn	3,242	168	1,008	4,250	46.03%	\$401,614.65		
Penn	1,250	-	-	1,383	14.98%	\$130,690.13		
	7,492	268	1,608	9,233	100.00%	\$872,496.02		
FY18 Revised Assessment								
FY18 Assessment						24,457,356.87		
Licensee	Slots	Table Games	Table Gaming Positions	Total Gaming Positions	Percentage of Gaming Positions	FY17 Initial Assessment	Credit	Revised Amount
MGM	3,000	100	600	3,600	38.99%	\$9,536,064.63	\$340,191.23	\$9,195,873.40
Wynn	3,242	168	1,008	4,250	46.03%	\$11,257,854.08	\$401,614.65	\$10,856,239.43
Penn	1,250	-	-	1,383	14.98%	\$3,663,438.16	\$130,690.13	\$3,532,748.03
	7,492	268	1,608	9,233	100.00%	\$24,457,356.87	\$872,496.02	\$23,584,860.85
<p>*Table gaming positions, slots and table gaming positions are derived by using the HLT figures from Finance Plan section of the Presentation under 2.3 of the table titled Proposed Facility Suitability. For estimating gaming positions from table games, a multiplier of 6 for each table game is used. For PPC, it is the amount approved as of June 6, 2016.</p>								

Conclusion:

After closing out FY17 and opening FY18, the Commission has surplus FY17 revenue of \$872.5K in the Gaming Control Fund. Staff will credit the \$872.5K to licensees in the amounts contained in the chart above.

Appendix A: FY17 Actuals Spending and Revenue Final Reversions

Appendix B: QRY Step 05A Expense Budget Form

2017 Row Labels	Budget Projections		Actuals To Date Total	Variance to Budget-- Over/(Under)	% Variance
	Initial Projection	Current Budget (Initial+Apvd Adjmts)			
10500001--Gaming Control Fund					
MGC Regulatory Cost					
AA REGULAR EMPLOYEE COMPENSATION	\$ 6,119,738.87	\$ 6,007,876.07	\$ 5,742,543.96	\$ (265,332.11)	-4.42%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 64,000.00	\$ 71,900.00	\$ 55,092.06	\$ (16,807.94)	-23.38%
CC SPECIAL EMPLOYEES	\$ 100,000.00	\$ 106,862.80	\$ 78,221.20	\$ (28,641.60)	-26.80%
DD PENSION & INSURANCE RELATED EX	\$ 2,208,428.60	\$ 2,173,258.60	\$ 2,050,012.17	\$ (123,246.43)	-5.67%
EE ADMINISTRATIVE EXPENSES	\$ 590,725.64	\$ 592,825.64	\$ 490,914.28	\$ (101,911.36)	-17.19%
FF PROGRAM, FACILITY, OPERATIONAL SUPPLIES	\$ -	\$ -	\$ 69,284.20	\$ 69,284.20	
GG ENERGY COSTS AND SPACE RENTAL	\$ 1,221,982.62	\$ 1,221,982.62	\$ 1,255,383.70	\$ 33,401.08	2.73%
HH CONSULTANT SVCS (TO DEPTS)	\$ 1,254,603.14	\$ 1,274,603.14	\$ 1,556,369.88	\$ 281,766.74	22.11%
JJ OPERATIONAL SERVICES	\$ 3,091,685.78	\$ 3,129,185.78	\$ 3,041,708.12	\$ (87,477.66)	-2.80%
KK Equipment Purchase	\$ -	\$ 8,400.00	\$ 16,045.54	\$ 7,645.54	91.02%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 29,683.80	\$ 29,683.80	\$ 18,375.06	\$ (11,308.74)	-38.10%
NN NON-MAJOR FACILITY MAINTENANCE REPAIR	\$ -	\$ -	\$ 40,537.27	\$ 40,537.27	
PP STATE AID/POL SUB/OSD	\$ 225,000.00	\$ 175,000.00	\$ 88,278.89	\$ (86,721.11)	-49.55%
TT PAYMENTS & REFUNDS POL ISA	\$ 50,000.00	\$ 50,000.00	\$ 7,457.00	\$ (42,543.00)	-85.09%
UU IT Non-Payroll Expenses	\$ 3,639,596.18	\$ 3,642,576.18	\$ 3,663,943.41	\$ 21,367.23	0.59%
MGC Regulatory Cost Subtotal:	\$ 18,595,444.63	\$ 18,484,154.63	\$ 18,174,166.74	\$ (309,987.89)	-1.68%
EE--Indirect Costs	\$ 1,648,870.20	\$ 1,648,870.20	\$ 1,507,283.80	\$ (141,586.40)	-8.59%
Office of Attorney General					
ISA to AGO	\$ 1,904,540.60	\$ 1,904,540.60	\$ 1,607,818.73	\$ (296,721.87)	-15.58%
TT Reimbursement for AGO 0810-1204(up to \$449,364)	\$ -	\$ -	\$ 156,153.67	\$ 156,153.67	
AGO State Police	\$ 472,303.76	\$ 472,303.76	\$ 598,694.45	\$ 126,390.69	26.76%
Office of Attorney General Subtotal:	\$ 2,376,844.36	\$ 2,376,844.36	\$ 2,362,666.85	\$ (14,177.51)	-0.60%
Research and Responsible Gaming/Public Health Trust Fund					
AA REGULAR EMPLOYEE COMPENSATION	\$ 232,465.30	\$ 232,465.30	214,382.09	(18,083.21)	-7.78%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 6,000.00	\$ 6,000.00	5,529.15	(470.85)	-7.85%
CC SPECIAL EMPLOYEES	\$ -	\$ -	2,112.00	2,112.00	
DD PENSION & INSURANCE RELATED EX	\$ 81,758.03	\$ 81,758.03	74,681.83	(7,076.20)	-8.66%
EE ADMINISTRATIVE EXPENSES	\$ 8,825.00	\$ 8,825.00	18,964.36	10,139.36	114.89%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 500.00	\$ 500.00	-	(500.00)	-100.00%
HH CONSULTANT SVCS (TO DEPTS)	\$ 1,437,500.00	\$ 1,427,500.00	1,448,933.77	21,433.77	1.50%
JJ OPERATIONAL SERVICES	\$ -	\$ 20,000.00	10,865.63	(9,134.37)	-45.67%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 40,000.00	\$ 40,000.00	265.30	(39,734.70)	-99.34%
PP STATE AID/POL SUB	\$ 2,130,000.00	\$ 2,130,000.00	1,925,153.91	(204,846.09)	-9.62%
UU IT Non-Payroll Expenses	\$ 65,000.00	\$ 65,000.00	15,506.60	(49,493.40)	-76.14%
ISA to DPH	\$ 473,487.00	\$ 473,487.00	468,335.66	(5,151.34)	-1.09%
Research and Responsible Gaming/Public Health Trust Fund Subtotal:	\$ 4,475,535.33	\$ 4,485,535.33	\$ 4,184,730.30	\$ (300,805.03)	-6.71%
ISA to ABCC	\$ 75,000.00	\$ 75,000.00	\$ 89,129.58	\$ 14,129.58	18.84%
Gaming Control Fund Total Costs	\$ 27,171,694.52	\$ 27,070,404.52	\$ 26,317,977.27	\$ (752,427.25)	-2.78%

Revenues	Revenue Projections		Actuals Total	Variance to Budget-- Over/(Under)	% Variance
	Initial Projection	Current Budget (Initial+Apvd Adjmts)			
Gaming Control Fund Beginning Balance 0500		\$ 987,501.13	\$ 987,501.13	\$ -	0.00%
Phase 1 Collections (restricted) 0500		\$ -	\$ -	\$ -	
Phase 1 Refunds 0500		\$ -	\$ -	\$ -	
Phase 2 Category 1 Collections (restricted) 0500		\$ -	\$ 59,197.85	\$ 59,197.85	
Region C Phase 1 Investigation Collections 0500	\$ -	\$ -	\$ -	\$ -	
Region C Phase 2 Category 1 Collections 0500		\$ -	\$ -	\$ -	
Grant Collections (restricted) 0500	\$ 50,000.00	\$ 50,000.00	\$ -	\$ (50,000.00)	-100.00%

Region A slot Machine Fee 0500	\$ 1,945,200.00	\$ 1,945,200.00	\$ 3,870,838.69	\$ 1,925,638.69	98.99%
Region B Slot Machine Fee 0500	\$ 1,800,000.00	\$ 1,800,000.00	\$ 3,600,000.00	\$ 1,800,000.00	100.00%
Slots Parlor Slot Machine Fee 0500	\$ 750,000.00	\$ 750,000.00	\$ 1,519,561.31	\$ 769,561.31	102.61%
Gaming Employee License Fees (GEL) 3000	\$ 35,000.00	\$ 35,000.00	\$ 48,375.00	\$ 13,375.00	38.21%
Key Gaming Executive (GKE) 3000	\$ 5,000.00	\$ 5,000.00	\$ 12,000.00	\$ 7,000.00	140.00%
Key Gaming Employee (GKS) 3000	\$ 15,000.00	\$ 15,000.00	\$ 14,400.00	\$ (600.00)	-4.00%
Non-Gaming Vendor (NGV) 3000	\$ 31,000.00	\$ 31,000.00	\$ 36,000.02	\$ 5,000.02	16.13%
Vendor Gaming Primary (VGP) 3000	\$ 30,000.00	\$ 30,000.00	\$ 45,000.00	\$ 15,000.00	50.00%
Vendor Gaming Secondary (VGS) 3000	\$ 45,000.00	\$ 45,000.00	\$ -	\$ (45,000.00)	-100.00%
Gaming School License (GSB)	\$ -	\$ -	\$ 100.00	\$ 100.00	
Gaming Service Employee License (SER) 3000	\$ 15,000.00	\$ 15,000.00	\$ 15,525.00	\$ 525.00	3.50%
Subcontractor ID Initial License (SUB) 3000	\$ -	\$ -	\$ -	\$ -	
Temporary License Initial License (TEM) 3000	\$ -	\$ -	\$ -	\$ -	
Veterans Initial License (VET) 3000	\$ -	\$ -	\$ -	\$ -	
Transfer of Licensing Fees to CMF 0500	\$ -	\$ -	\$ -	\$ -	
Assessment 0500	\$ 22,450,494.52	\$ 21,462,993.39	\$ 21,403,227.60	\$ (59,765.79)	-0.28%
Misc 0500	\$ -	\$ -	\$ 73,946.69	\$ 73,946.69	
FY18 Slot Assessment Collected in FY17	\$ -	\$ -	\$ (4,495,200.00)	\$ (4,495,200.00)	
Grand Total	\$ 27,171,694.52	\$ 27,171,694.52	\$ 27,190,473.29	\$ 18,778.77	0.07%
Balance in Gaming Control Fund--Positive/(Negative)			\$ 872,496.02		

Row Labels	Budget Projections					
	Initial Projection	Current Budget		Actuals To Date	Variance to Budget--	% Variance
		(Initial+Bal Fwd+Apvd Adjmts)	Total			
1050003						
AA REGULAR EMPLOYEE COMPENSATION	\$ 383,644.22	\$ 383,644.22	\$ 386,714.19	\$ 3,069.97	0.79%	
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 12,000.00	\$ 12,000.00	\$ 3,185.29	\$ (8,814.71)	-276.73%	
CC SPECIAL EMPLOYEES	\$ 330,000.00	\$ 330,000.00	\$ 416,185.74	\$ 86,185.74	20.71%	
DD PENSION & INSURANCE RELATED EX	\$ 135,249.14	\$ 187,867.14	\$ 218,904.24	\$ 31,037.10	14.18%	
EE ADMINISTRATIVE EXPENSES	\$ 32,855.00	\$ 147,036.85	\$ 189,477.44	\$ 42,440.59	22.40%	
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 2,000.00	\$ 2,000.00	\$ 2,033.02	\$ 33.02	1.62%	
HH CONSULTANT SVCS (TO DEPTS)	\$ 25,000.00	\$ 25,000.00	\$ 15,600.00	\$ (9,400.00)	-60.26%	
JJ OPERATIONAL SERVICES	\$ 238,300.00	\$ 703,600.00	\$ 704,168.31	\$ 568.31	0.08%	
KK EQUIPMENT PURCHASES	\$ -	\$ 15,000.00	\$ 36,458.90	\$ 21,458.90	58.86%	
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 3,500.00	\$ 3,500.00	\$ 483.31	\$ (3,016.69)	-624.17%	
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 235,000.00	\$ 235,000.00	\$ 130,000.00	\$ (105,000.00)	-80.77%	
NN INFRASTRUCTURE:	\$ -	\$ -	\$ -	\$ -	#DIV/0!	
TT LOANS AND SPECIAL PAYMENTS	\$ -	\$ 565,196.77	\$ 565,196.77	\$ -	0.00%	
UU IT Non-Payroll Expenses	\$ 78,700.00	\$ 78,700.00	\$ 87,139.69	\$ 8,439.69	9.69%	
ISA to DPH	\$ -	\$ 70,000.00	\$ 70,000.00	\$ -	0.00%	
Grand Total	\$ 1,476,248.36	\$ 2,758,544.98	\$ 2,825,546.90	\$ 67,001.92	2.37%	

Revenues	Revenue Projections					
	Initial Projection	Current Budget		Actuals Total	Variance to Budget--	% Variance
		(Initial+Apvd Adjmts)	Total			
Plainridge Assessment 4800	\$ 170,849.60	\$ 170,849.60	\$ 105,799.36	\$ (65,050.24)	-38.07%	
Plainridge Daily License Fee 3003	\$ 124,695.42	\$ 124,695.42	\$ 105,154.80	\$ (19,540.62)	-15.67%	
Plainridge Occupational License 3003/3004	\$ 85,000.00	\$ 85,000.00	\$ 51,970.00	\$ (33,030.00)	-38.86%	
Plainridge Racing Development Oversight Live 0131	\$ 18,674.66	\$ 18,674.66	\$ 8,464.27	\$ (10,210.39)	-54.68%	
Plainridge Racing Development Oversight Simulcast 0131	\$ 264,972.66	\$ 264,972.66	\$ 152,081.25	\$ (112,891.41)	-42.60%	
Racing Oversight and Development Balance Forward 0131	\$ -	\$ -	\$ 1,807,217.44	\$ 1,807,217.44		
Raynham Assessment 4800	\$ 126,681.83	\$ 126,681.83	\$ 118,196.12	\$ (8,485.71)	-6.70%	
Raynham Daily License Fee 3003	\$ 110,931.00	\$ 110,931.00	\$ 111,145.85	\$ 214.85	0.19%	
Raynham Racing Development Oversight Simulcast 0131	\$ 457,149.55	\$ 457,149.55	\$ 235,687.87	\$ (221,461.68)	-48.44%	
Suffolk Assessment 4800	\$ 437,169.33	\$ 437,169.33	\$ 312,489.18	\$ (124,680.15)	-28.52%	
Suffolk Commission Racing Development Oversight Simulcast 0131	\$ 170,748.32	\$ 170,748.32	\$ 180,175.46	\$ 9,427.14	5.52%	
Suffolk Daily License Fee 3003	\$ 80,631.00	\$ 80,631.00	\$ 210,146.40	\$ 129,515.40	160.63%	
Suffolk Occupational License 3003/3004	\$ 20,000.00	\$ 20,000.00	\$ 34,535.00	\$ 14,535.00	72.68%	
Suffolk Racing Development Oversight Live 0131	\$ -	\$ -	\$ 8,813.87	\$ 8,813.87		
Suffolk TVG Commission Live 0131	\$ -	\$ -	\$ 603.84	\$ 603.84		
Suffolk TVG Commission Simulcast 0131	\$ 92,997.43	\$ 92,997.43	\$ 187,117.68	\$ 94,120.25	101.21%	

Appendix A FY17 Actuals Spending and Revenue Final Reversions.xlsx

Suffolk Twin Spires Commission Live 0131		\$	-	\$	372.74	\$	372.74	
Suffolk Twin Spires Commission Simulcast 0131	\$	92,997.43	\$	92,997.43	\$	111,152.62	\$	18,155.19 19.52%
Suffolk Xpress Bet Commission Live 0131		\$	-	\$	203.03	\$	203.03	
Suffolk Xpress Bet Commission Simulcast 0131	\$	92,997.43	\$	92,997.43	\$	43,208.18	\$	(49,789.25) -53.54%
Suffolk NYRA Bet Commission Live 0131	\$	-	\$	-	\$	8.87	\$	8.87
Suffolk NYRA Bet Commission Simulcast 0131	\$	-	\$	-	\$	11,060.15	\$	11,060.15
Transfer to General Fund 10500140 0000		\$	-	\$	-	\$	-	
Wonderland Assessment 4800	\$	15,132.22	\$	15,132.22	\$	36,037.42	\$	20,905.20 138.15%
Wonderland Daily License Fee 3003	\$	80,073.00	\$	80,073.00	\$	53,595.60	\$	(26,477.40) -33.07%
Wonderland Racing Development Oversight Simulcast 0131	\$	120,746.64	\$	120,746.64	\$	21,850.78	\$	(98,895.86) -81.90%
Plainridge fine 2700		\$	-	\$	20,210.00	\$	20,210.00	
Suffolk Fine 2700		\$	-	\$	-	\$	-	
Plainridge Unclaimed wagers 5009	\$	185,000.00	\$	185,000.00	\$	163,101.82	\$	(21,898.18) -11.84%
Suffolk Unclaimed wagers 5009	\$	250,000.00	\$	250,000.00	\$	208,279.26	\$	(41,720.74) -16.69%
Raynham Unclaimed wagers 5009	\$	155,000.00	\$	155,000.00	\$	180,953.94	\$	25,953.94 16.74%
Wonderland Unclaimed wagers 5009	\$	7,000.00	\$	7,000.00	\$	17,261.75	\$	10,261.75 146.60%
Misc 0131		\$	-	\$	10.45	\$	10.45	
Grand Total		\$3,159,447.52		\$3,159,447.52		\$4,496,905.00		\$1,337,457.48 42%
Balance in Racing Oversight Fund--Positive/(Negative)						\$1,671,358.10		

QRY--Step 05A Expense Budget Form

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500001													
		1000		Division of Finance and Administration										
			AA	REGULAR EMPLOYEE COMPENSATION	\$500,089.89	\$0.00	\$502,242.41	\$502,242.41	\$0.00	\$502,242.41	(\$2,152.52)	100.43%	100.43%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$2,200.00	\$0.00	\$1,844.93	\$1,844.93	\$0.00	\$1,844.93	\$355.07	83.86%	83.86%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$175,881.61	\$0.00	\$175,928.24	\$175,928.24	\$0.00	\$175,928.24	(\$46.63)	100.03%	100.03%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$199,288.63	\$0.00	\$186,582.84	\$186,582.84	\$0.00	\$186,582.84	\$12,705.79	93.62%	93.62%	100.00%
			GG	ENERGY COSTS AND SPACE RENTAL	\$1,193,902.62	\$0.00	\$1,193,411.08	\$1,193,411.08	\$0.00	\$1,193,411.08	\$491.54	99.96%	99.96%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$174,691.49	\$0.00	\$140,819.84	\$140,819.84	\$0.00	\$140,819.84	\$33,871.65	80.61%	80.61%	100.00%
			JJ	OPERATIONAL SERVICES	\$2,000.00	\$0.00	\$1,499.76	\$1,499.76	\$0.00	\$1,499.76	\$500.24	74.99%	74.99%	100.00%
			KK	EQUIPMENT PURCHASE	\$1,000.00	\$0.00	\$2,079.79	\$2,079.79	\$0.00	\$2,079.79	(\$1,079.79)	207.98%	207.98%	100.00%
			LL	EQUIPMENT LEASE-MAINTAIN/REPAR	\$29,683.80	\$0.00	\$13,145.56	\$13,145.56	\$0.00	\$13,145.56	\$16,538.24	44.29%	44.29%	100.00%
			UU	IT Non-Payroll Expenses	\$14,700.00	\$0.00	\$17,921.35	\$17,921.35	\$0.00	\$17,921.35	(\$3,221.35)	121.91%	121.91%	100.00%
			Total:	Division of Finance and Administration	\$2,293,438.04	\$0.00	\$2,235,475.80	\$2,235,475.80	\$0.00	\$2,235,475.80	\$57,962.24	97.47%	97.47%	100.00%
		1100		Human Resources										
			AA	REGULAR EMPLOYEE COMPENSATION	\$268,536.07	\$0.00	\$236,792.31	\$236,792.31	\$0.00	\$236,792.31	\$31,743.76	88.18%	88.18%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$1,000.00	\$0.00	\$203.70	\$203.70	\$0.00	\$203.70	\$796.30	20.37%	20.37%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$105,862.95	\$0.00	\$133,256.20	\$133,256.20	\$0.00	\$133,256.20	(\$27,393.25)	125.88%	125.88%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$66,199.85	\$0.00	\$42,922.05	\$42,922.05	\$0.00	\$42,922.05	\$23,277.80	64.84%	64.84%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$5,000.00	\$0.00	\$2,739.22	\$2,739.22	\$0.00	\$2,739.22	\$2,260.78	54.78%	54.78%	100.00%
			JJ	OPERATIONAL SERVICES	\$19,750.00	\$0.00	\$3,772.00	\$3,772.00	\$0.00	\$3,772.00	\$15,978.00	19.10%	19.10%	100.00%
			Total:	Human Resources	\$466,348.87	\$0.00	\$419,685.48	\$419,685.48	\$0.00	\$419,685.48	\$46,663.39	89.99%	89.99%	100.00%
		1200		Office of the General Counsel										
			AA	REGULAR EMPLOYEE COMPENSATION	\$510,413.86	\$0.00	\$512,304.60	\$512,304.60	\$0.00	\$512,304.60	(\$1,890.74)	100.37%	100.37%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$6,500.00	\$0.00	\$2,163.23	\$2,163.23	\$0.00	\$2,163.23	\$4,336.77	33.28%	33.28%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$165,543.17	\$0.00	\$179,479.75	\$179,479.75	\$0.00	\$179,479.75	(\$13,936.58)	108.42%	108.42%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$141,640.11	\$0.00	\$176,438.70	\$176,438.70	\$0.00	\$176,438.70	(\$34,798.59)	124.57%	124.57%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$888,603.14	\$0.00	\$1,087,313.12	\$1,087,313.12	\$0.00	\$1,087,313.12	(\$198,709.98)	122.36%	122.36%	100.00%
			JJ	OPERATIONAL SERVICES	\$10,000.00	\$0.00	\$5,041.62	\$5,041.62	\$0.00	\$5,041.62	\$4,958.38	50.42%	50.42%	100.00%

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500001													
		1200		Office of the General Counsel										
			Total:	Office of the General Counsel	\$1,722,700.28	\$0.00	\$1,962,741.02	\$1,962,741.02	\$0.00	\$1,962,741.02	(\$240,040.74)	113.93%	113.93%	100.00%
		1300		Executive Director										
			AA	REGULAR EMPLOYEE COMPENSATION	\$378,640.38	\$0.00	\$381,900.81	\$381,900.81	\$0.00	\$381,900.81	(\$3,260.43)	100.86%	100.86%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$8,000.00	\$0.00	\$3,125.81	\$3,125.81	\$0.00	\$3,125.81	\$4,874.19	39.07%	39.07%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$133,167.82	\$0.00	\$133,423.56	\$133,423.56	\$0.00	\$133,423.56	(\$255.74)	100.19%	100.19%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$88,864.04	\$0.00	\$63,756.69	\$63,756.69	\$0.00	\$63,756.69	\$25,107.35	71.75%	71.75%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$180,000.00	\$0.00	\$180,000.00	\$180,000.00	\$0.00	\$180,000.00	\$0.00	100.00%	100.00%	100.00%
			Total:	Executive Director	\$788,672.24	\$0.00	\$762,206.87	\$762,206.87	\$0.00	\$762,206.87	\$26,465.37	96.64%	96.64%	100.00%
		1400		Information Technology										
			AA	REGULAR EMPLOYEE COMPENSATION	\$553,295.91	\$0.00	\$532,184.95	\$532,184.95	\$0.00	\$532,184.95	\$21,110.96	96.18%	96.18%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$9,000.00	\$0.00	\$3,280.54	\$3,280.54	\$0.00	\$3,280.54	\$5,719.46	36.45%	36.45%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$198,111.17	\$0.00	\$186,456.09	\$186,456.09	\$0.00	\$186,456.09	\$11,655.08	94.12%	94.12%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$462,369.29	\$0.00	\$401,452.13	\$401,452.13	\$0.00	\$401,452.13	\$60,917.16	86.82%	86.82%	100.00%
			GG	ENERGY COSTS AND SPACE RENTAL	\$28,000.00	\$0.00	\$33,472.62	\$33,472.62	\$0.00	\$33,472.62	(\$5,472.62)	119.55%	119.55%	100.00%
			UU	IT Non-Payroll Expenses	\$3,628,676.18	\$0.00	\$3,543,385.85	\$3,543,385.85	\$0.00	\$3,543,385.85	\$85,290.33	97.65%	97.65%	100.00%
			Total:	Information Technology	\$4,879,452.55	\$0.00	\$4,700,232.18	\$4,700,232.18	\$0.00	\$4,700,232.18	\$179,220.37	96.33%	96.33%	100.00%
		1500		Commissioners										
			AA	REGULAR EMPLOYEE COMPENSATION	\$869,653.65	\$0.00	\$874,713.36	\$874,713.36	\$0.00	\$874,713.36	(\$5,059.71)	100.58%	100.58%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$10,000.00	\$0.00	\$12,997.54	\$12,997.54	\$0.00	\$12,997.54	(\$2,997.54)	129.98%	129.98%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$311,132.69	\$0.00	\$305,699.40	\$305,699.40	\$0.00	\$305,699.40	\$5,433.29	98.25%	98.25%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$155,125.37	\$0.00	\$123,831.26	\$123,831.26	\$0.00	\$123,831.26	\$31,294.11	79.83%	79.83%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$50,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$50,000.00	0.00%	0.00%	100.00%
			JJ	OPERATIONAL SERVICES	\$54,600.00	\$0.00	\$35,199.49	\$35,199.49	\$0.00	\$35,199.49	\$19,400.51	64.47%	64.47%	100.00%
			Total:	Commissioners	\$1,450,511.71	\$0.00	\$1,352,441.05	\$1,352,441.05	\$0.00	\$1,352,441.05	\$98,070.66	93.24%	93.24%	100.00%
		1600		Office of Workforce, Supplier and Diversity Development										
			AA	REGULAR EMPLOYEE COMPENSATION	\$176,279.28	\$0.00	\$154,227.99	\$154,227.99	\$0.00	\$154,227.99	\$22,051.29	87.49%	87.49%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$5,000.00	\$0.00	\$5,323.91	\$5,323.91	\$0.00	\$5,323.91	(\$323.91)	106.48%	106.48%	100.00%

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500001													
		1600		Office of Workforce, Supplier and Diversity Development										
			CC	SPECIAL EMPLOYEES	\$6,862.80	\$0.00	\$6,862.80	\$6,862.80	\$0.00	\$6,862.80	\$0.00	100.00%	100.00%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$69,159.02	\$0.00	\$53,610.54	\$53,610.54	\$0.00	\$53,610.54	\$15,548.48	77.52%	77.52%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$59,664.21	\$0.00	\$43,818.79	\$43,818.79	\$0.00	\$43,818.79	\$15,845.42	73.44%	73.44%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$125,000.00	\$0.00	\$73,500.00	\$73,500.00	\$0.00	\$73,500.00	\$51,500.00	58.80%	58.80%	100.00%
			PP	STATE AID/POL SUB	\$125,000.00	\$0.00	\$70,000.00	\$70,000.00	\$0.00	\$70,000.00	\$55,000.00	56.00%	56.00%	100.00%
			Total:	Office of Workforce, Supplier and Diversity D	\$566,965.31	\$0.00	\$407,344.03	\$407,344.03	\$0.00	\$407,344.03	\$159,621.28	71.85%	71.85%	100.00%
		1700		Office of Research and Problem Gambling										
			AA	REGULAR EMPLOYEE COMPENSATION	\$304,684.30	\$0.00	\$214,382.09	\$214,382.09	\$0.00	\$214,382.09	\$90,302.21	70.36%	70.36%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$9,000.00	\$0.00	\$5,529.15	\$5,529.15	\$0.00	\$5,529.15	\$3,470.85	61.44%	61.44%	100.00%
			CC	SPECIAL EMPLOYEES	\$20,000.00	\$0.00	\$2,112.00	\$2,112.00	\$0.00	\$2,112.00	\$17,888.00	10.56%	10.56%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$113,745.03	\$0.00	\$74,681.83	\$74,681.83	\$0.00	\$74,681.83	\$39,063.20	65.66%	65.66%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$185,496.53	\$0.00	\$186,568.14	\$186,568.14	\$0.00	\$186,568.14	(\$1,071.61)	100.58%	100.58%	100.00%
			FF	FACILITY OPERATIONAL EXPENSES	\$500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$500.00	0.00%	0.00%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$1,535,995.00	\$0.00	\$1,448,933.77	\$1,448,933.77	\$0.00	\$1,448,933.77	\$87,061.23	94.33%	94.33%	100.00%
			JJ	OPERATIONAL SERVICES	\$20,000.00	\$0.00	\$10,865.63	\$10,865.63	\$0.00	\$10,865.63	\$9,134.37	54.33%	54.33%	100.00%
			MM	PURCHASED CLIENT/PROGRAM SVCS	\$40,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$40,000.00	0.00%	0.00%	100.00%
			PP	STATE AID/POL SUB	\$2,351,300.00	\$0.00	\$1,925,153.91	\$1,925,153.91	\$0.00	\$1,925,153.91	\$426,146.09	81.88%	81.88%	100.00%
			UU	IT Non-Payroll Expenses	\$96,700.00	\$0.00	\$15,506.60	\$15,506.60	\$0.00	\$15,506.60	\$81,193.40	16.04%	16.04%	100.00%
			Total:	Office of Research and Problem Gambling	\$4,677,420.86	\$0.00	\$3,883,733.12	\$3,883,733.12	\$0.00	\$3,883,733.12	\$793,687.74	83.03%	83.03%	100.00%
		1800		Office of Communications										
			AA	REGULAR EMPLOYEE COMPENSATION	\$209,210.02	\$0.00	\$211,443.17	\$211,443.17	\$0.00	\$211,443.17	(\$2,233.15)	101.07%	101.07%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$3,900.00	\$0.00	\$4,264.28	\$4,264.28	\$0.00	\$4,264.28	(\$364.28)	109.34%	109.34%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$73,579.17	\$0.00	\$73,699.23	\$73,699.23	\$0.00	\$73,699.23	(\$120.06)	100.16%	100.16%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$57,521.00	\$0.00	\$61,462.65	\$61,462.65	\$0.00	\$61,462.65	(\$3,941.65)	106.85%	106.85%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$25,000.00	\$0.00	\$24,099.48	\$24,099.48	\$0.00	\$24,099.48	\$900.52	96.40%	96.40%	100.00%
			JJ	OPERATIONAL SERVICES	\$30,000.00	\$0.00	\$24,929.25	\$24,929.25	\$0.00	\$24,929.25	\$5,070.75	83.10%	83.10%	100.00%
			KK	EQUIPMENT PURCHASE	\$0.00	\$0.00	\$505.29	\$505.29	\$0.00	\$505.29	(\$505.29)	#Div/0!	#Div/0!	100.00%
			Total:	Office of Communications	\$399,210.19	\$0.00	\$400,403.35	\$400,403.35	\$0.00	\$400,403.35	(\$1,193.16)	100.30%	100.30%	100.00%

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500001													
	1900			Ombudsman										
			AA	REGULAR EMPLOYEE COMPENSATION	\$314,594.66	\$0.00	\$316,630.10	\$316,630.10	\$0.00	\$316,630.10	(\$2,035.44)	100.65%	100.65%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$0.00	\$0.00	\$175.13	\$175.13	\$0.00	\$175.13	(\$175.13)	#Div/0!	#Div/0!	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$110,642.94	\$0.00	\$110,682.91	\$110,682.91	\$0.00	\$110,682.91	(\$39.97)	100.04%	100.04%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$37,459.47	\$0.00	\$35,821.02	\$35,821.02	\$0.00	\$35,821.02	\$1,638.45	95.63%	95.63%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$25,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$25,000.00	0.00%	0.00%	100.00%
			JJ	OPERATIONAL SERVICES	\$10,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,000.00	0.00%	0.00%	100.00%
			PP	STATE AID/POL SUB	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	100.00%
			Total:	Ombudsman	\$497,697.07	\$0.00	\$463,309.16	\$463,309.16	\$0.00	\$463,309.16	\$34,387.91	93.09%	93.09%	100.00%
	5000			Investigations Enforcement										
			AA	REGULAR EMPLOYEE COMPENSATION	\$1,647,026.32	\$0.00	\$1,622,280.74	\$1,622,280.74	\$0.00	\$1,622,280.74	\$24,745.58	98.50%	98.50%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$19,000.00	\$0.00	\$17,444.53	\$17,444.53	\$0.00	\$17,444.53	\$1,555.47	91.81%	91.81%	100.00%
			CC	SPECIAL EMPLOYEES	\$100,000.00	\$0.00	\$68,488.40	\$68,488.40	\$0.00	\$68,488.40	\$31,511.60	68.49%	68.49%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$587,299.22	\$0.00	\$558,279.22	\$558,279.22	\$0.00	\$558,279.22	\$29,020.00	95.06%	95.06%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$682,186.21	\$0.00	\$591,347.95	\$591,347.95	\$0.00	\$591,347.95	\$90,838.26	86.68%	86.68%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$0.00	\$0.00	\$41,073.22	\$41,073.22	\$0.00	\$41,073.22	(\$41,073.22)	#Div/0!	#Div/0!	100.00%
			JJ	OPERATIONAL SERVICES	\$3,052,835.78	\$0.00	\$2,976,579.69	\$2,976,579.69	\$0.00	\$2,976,579.69	\$76,256.09	97.50%	97.50%	100.00%
			KK	EQUIPMENT PURCHASE	\$8,900.00	\$0.00	\$11,326.56	\$11,326.56	\$0.00	\$11,326.56	(\$2,426.56)	127.26%	127.26%	100.00%
			UU	IT Non-Payroll Expenses	\$12,000.00	\$0.00	\$750.00	\$750.00	\$0.00	\$750.00	\$11,250.00	6.25%	6.25%	100.00%
			Total:	Investigations Enforcement	\$6,109,247.53	\$0.00	\$5,887,570.31	\$5,887,570.31	\$0.00	\$5,887,570.31	\$221,677.22	96.37%	96.37%	100.00%
	7000			Licensing										
			AA	REGULAR EMPLOYEE COMPENSATION	\$403,144.54	\$0.00	\$397,823.52	\$397,823.52	\$0.00	\$397,823.52	\$5,321.02	98.68%	98.68%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$7,500.00	\$0.00	\$4,268.46	\$4,268.46	\$0.00	\$4,268.46	\$3,231.54	56.91%	56.91%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$137,458.27	\$0.00	\$139,497.03	\$139,497.03	\$0.00	\$139,497.03	(\$2,038.76)	101.48%	101.48%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$53,147.38	\$0.00	\$43,247.34	\$43,247.34	\$0.00	\$43,247.34	\$9,900.04	81.37%	81.37%	100.00%
			KK	EQUIPMENT PURCHASE	\$1,909.58	\$0.00	\$1,741.15	\$1,741.15	\$0.00	\$1,741.15	\$168.43	91.18%	91.18%	100.00%
			Total:	Licensing	\$603,159.77	\$0.00	\$586,577.50	\$586,577.50	\$0.00	\$586,577.50	\$16,582.27	97.25%	97.25%	100.00%
	9000			AGO State Police										

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500001													
		9000		AGO State Police										
			EE	ADMINISTRATIVE EXPENSES	\$47,230.38	\$0.00	\$59,230.38	\$59,230.38	\$0.00	\$59,230.38	(\$12,000.00)	125.41%	125.41%	100.00%
			JJ	OPERATIONAL SERVICES	\$472,303.76	\$0.00	\$592,303.76	\$592,303.76	\$0.00	\$592,303.76	(\$120,000.00)	125.41%	125.41%	100.00%
		Total:		AGO State Police	\$519,534.14	\$0.00	\$651,534.14	\$651,534.14	\$0.00	\$651,534.14	(\$132,000.00)	125.41%	125.41%	100.00%
Total:	10500001				\$24,974,358.56	\$0.00	\$23,713,254.01	\$23,713,254.01	\$0.00	\$23,713,254.01	\$1,261,104.55	94.95%	94.95%	100.00%
	10500003													
		1000		Division of Finance and Administration										
			AA	REGULAR EMPLOYEE COMPENSATION	\$24,808.99	\$0.00	\$25,524.91	\$25,524.91	\$0.00	\$25,524.91	(\$715.92)	102.89%	102.89%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$8,725.32	\$0.00	\$8,938.92	\$8,938.92	\$0.00	\$8,938.92	(\$213.60)	102.45%	102.45%	100.00%
		Total:		Division of Finance and Administration	\$33,534.31	\$0.00	\$34,463.83	\$34,463.83	\$0.00	\$34,463.83	(\$929.52)	102.77%	102.77%	100.00%
		1100		Human Resources										
			AA	REGULAR EMPLOYEE COMPENSATION	\$20,887.31	\$0.00	\$6,221.65	\$6,221.65	\$0.00	\$6,221.65	\$14,665.66	29.79%	29.79%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$2,156.54	\$0.00	\$2,187.54	\$2,187.54	\$0.00	\$2,187.54	(\$31.00)	101.44%	101.44%	100.00%
		Total:		Human Resources	\$23,043.85	\$0.00	\$8,409.19	\$8,409.19	\$0.00	\$8,409.19	\$14,634.66	36.49%	36.49%	100.00%
		1200		Office of the General Counsel										
			AA	REGULAR EMPLOYEE COMPENSATION	\$7,590.34	\$0.00	\$7,854.71	\$7,854.71	\$0.00	\$7,854.71	(\$264.37)	103.48%	103.48%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$2,669.52	\$0.00	\$2,724.25	\$2,724.25	\$0.00	\$2,724.25	(\$54.73)	102.05%	102.05%	100.00%
		Total:		Office of the General Counsel	\$10,259.86	\$0.00	\$10,578.96	\$10,578.96	\$0.00	\$10,578.96	(\$319.10)	103.11%	103.11%	100.00%
		1300		Executive Director										
			AA	REGULAR EMPLOYEE COMPENSATION	\$9,321.15	\$0.00	\$9,645.79	\$9,645.79	\$0.00	\$9,645.79	(\$324.64)	103.48%	103.48%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$3,278.25	\$0.00	\$3,345.41	\$3,345.41	\$0.00	\$3,345.41	(\$67.16)	102.05%	102.05%	100.00%
		Total:		Executive Director	\$12,599.40	\$0.00	\$12,991.20	\$12,991.20	\$0.00	\$12,991.20	(\$391.80)	103.11%	103.11%	100.00%
		1400		Information Technology										
			AA	REGULAR EMPLOYEE COMPENSATION	\$9,735.42	\$0.00	\$10,115.54	\$10,115.54	\$0.00	\$10,115.54	(\$380.12)	103.90%	103.90%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$3,423.95	\$0.00	\$3,520.99	\$3,520.99	\$0.00	\$3,520.99	(\$97.04)	102.83%	102.83%	100.00%
		Total:		Information Technology	\$13,159.37	\$0.00	\$13,636.53	\$13,636.53	\$0.00	\$13,636.53	(\$477.16)	103.63%	103.63%	100.00%
		1500		Commissioners										
			AA	REGULAR EMPLOYEE COMPENSATION	\$30,868.79	\$0.00	\$31,649.14	\$31,649.14	\$0.00	\$31,649.14	(\$780.35)	102.53%	102.53%	100.00%

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500003													
		1500		Commissioners										
			DD	PENSION & INSURANCE RELATED EX	\$10,856.55	\$0.00	\$11,127.83	\$11,127.83	\$0.00	\$11,127.83	(\$271.28)	102.50%	102.50%	100.00%
		Total:		Commissioners	\$41,725.34	\$0.00	\$42,776.97	\$42,776.97	\$0.00	\$42,776.97	(\$1,051.63)	102.52%	102.52%	100.00%
		3000		Racing Division										
			AA	REGULAR EMPLOYEE COMPENSATION	\$280,432.22	\$0.00	\$295,702.45	\$295,702.45	\$0.00	\$295,702.45	(\$15,270.23)	105.45%	105.45%	100.00%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$12,000.00	\$0.00	\$2,142.91	\$2,142.91	\$0.00	\$2,142.91	\$9,857.09	17.86%	17.86%	100.00%
			CC	SPECIAL EMPLOYEES	\$330,000.00	\$0.00	\$416,185.74	\$416,185.74	\$0.00	\$416,185.74	(\$86,185.74)	126.12%	126.12%	100.00%
			DD	PENSION & INSURANCE RELATED EX	\$156,757.01	\$0.00	\$187,059.30	\$187,059.30	\$0.00	\$187,059.30	(\$30,302.29)	119.33%	119.33%	100.00%
			EE	ADMINISTRATIVE EXPENSES	\$147,036.85	\$0.00	\$180,376.29	\$180,376.29	\$0.00	\$180,376.29	(\$33,339.44)	122.67%	122.67%	100.00%
			FF	FACILITY OPERATIONAL EXPENSES	\$2,000.00	\$0.00	\$2,033.02	\$2,033.02	\$0.00	\$2,033.02	(\$33.02)	101.65%	101.65%	100.00%
			HH	CONSULTANT SVCS (TO DEPTS)	\$25,000.00	\$0.00	\$15,600.00	\$15,600.00	\$0.00	\$15,600.00	\$9,400.00	62.40%	62.40%	100.00%
			JJ	OPERATIONAL SERVICES	\$703,600.00	\$0.00	\$704,168.31	\$704,168.31	\$0.00	\$704,168.31	(\$568.31)	100.08%	100.08%	100.00%
			KK	EQUIPMENT PURCHASE	\$15,000.00	\$0.00	\$36,458.90	\$36,458.90	\$0.00	\$36,458.90	(\$21,458.90)	243.06%	243.06%	100.00%
			LL	EQUIPMENT LEASE-MAINTAIN/REPAR	\$3,500.00	\$0.00	\$483.31	\$483.31	\$0.00	\$483.31	\$3,016.69	13.81%	13.81%	100.00%
			MM	PURCHASED CLIENT/PROGRAM SVCS	\$235,000.00	\$0.00	\$130,000.00	\$130,000.00	\$0.00	\$130,000.00	\$105,000.00	55.32%	55.32%	100.00%
			UU	IT Non-Payroll Expenses	\$78,700.00	\$0.00	\$87,139.69	\$87,139.69	\$0.00	\$87,139.69	(\$8,439.69)	110.72%	110.72%	100.00%
		Total:		Racing Division	\$1,989,026.08	\$0.00	\$2,057,349.92	\$2,057,349.92	\$0.00	\$2,057,349.92	(\$68,323.84)	103.44%	103.44%	100.00%
	Total:	10500003			\$2,123,348.21	\$0.00	\$2,180,206.60	\$2,180,206.60	\$0.00	\$2,180,206.60	(\$56,858.39)	102.68%	102.68%	100.00%
	10500013													
		3000		Racing Division										
			TT	LOANS AND SPECIAL PAYMENTS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	100.00%
		Total:		Racing Division	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	100.00%
	Total:	10500013			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	100.00%
	10500021													
		3000		Racing Division										
			TT	LOANS AND SPECIAL PAYMENTS	\$0.00	\$0.00	\$206,952.57	\$206,952.57	\$0.00	\$206,952.57	(\$206,952.57)	#Div/0!	#Div/0!	100.00%
		Total:		Racing Division	\$0.00	\$0.00	\$206,952.57	\$206,952.57	\$0.00	\$206,952.57	(\$206,952.57)	#Div/0!	#Div/0!	100.00%
	Total:	10500021			\$0.00	\$0.00	\$206,952.57	\$206,952.57	\$0.00	\$206,952.57	(\$206,952.57)	#Div/0!	#Div/0!	100.00%

BFY	Appropriation	Division	Obj Clas	Object Class Name	Obligation Ceiling	Accrued Expenses	Cash Expenses	Total Expenses	Encumbered	Committed	Uncommitted	% Spent	% Comtd	% BFY Passed
2017														
	10500022													
		3000		Racing Division										
			TT	LOANS AND SPECIAL PAYMENTS	\$0.00	\$0.00	\$766,575.08	\$766,575.08	\$0.00	\$766,575.08	(\$766,575.08)	#Div/0!	#Div/0!	100.00%
		Total:		Racing Division	\$0.00	\$0.00	\$766,575.08	\$766,575.08	\$0.00	\$766,575.08	(\$766,575.08)	#Div/0!	#Div/0!	100.00%
Total:	10500022				\$0.00	\$0.00	\$766,575.08	\$766,575.08	\$0.00	\$766,575.08	(\$766,575.08)	#Div/0!	#Div/0!	100.00%

Economic and Fiscal Research Agenda for FY17: Major Activities

Rod Motamedi, Research Manager
Thomas Peake, Research Analyst
Economic and Public Policy Research
UMass Donahue Institute

Goal/Objective of the Economic Research

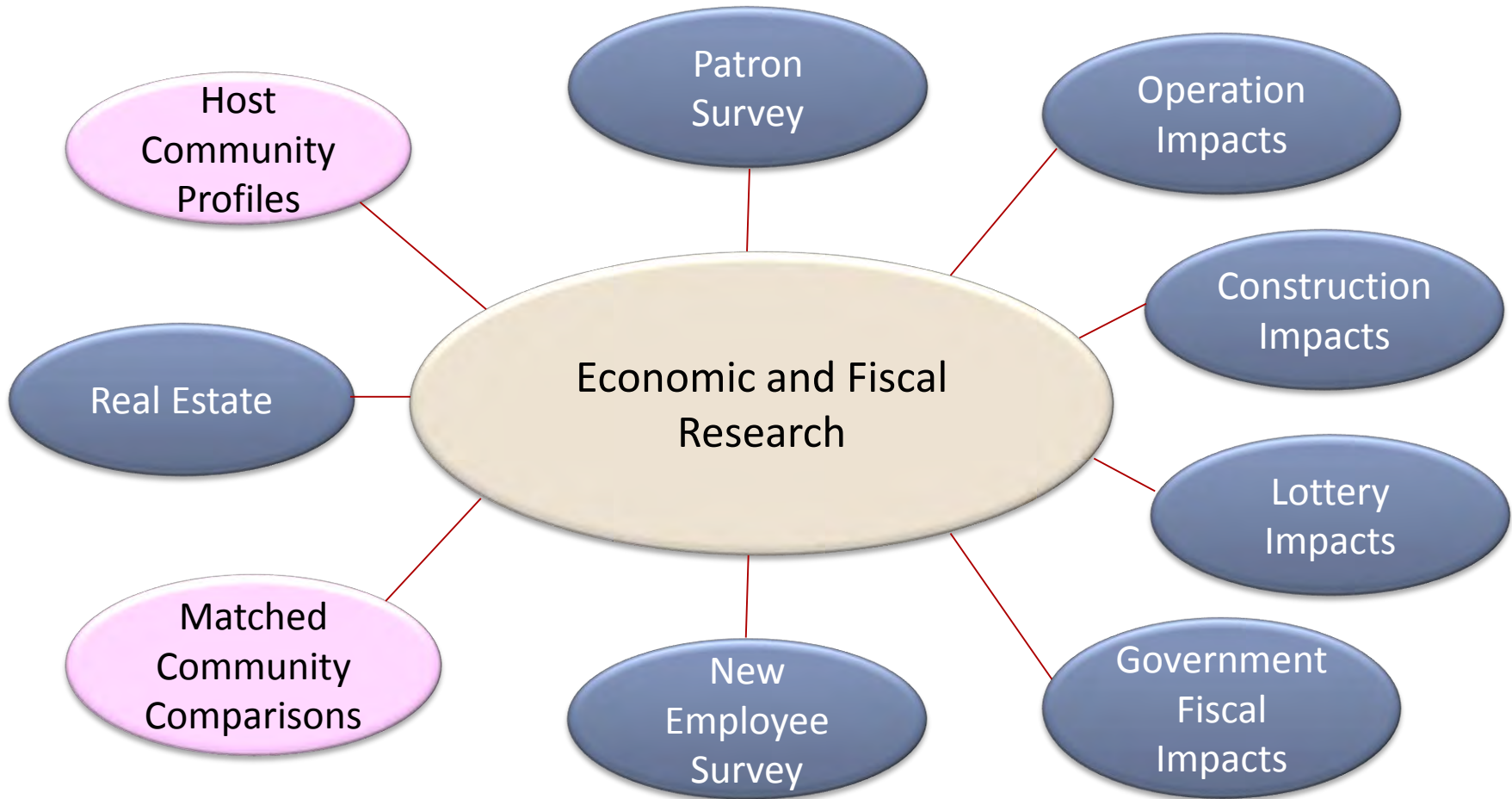
- Measure and determine economic and fiscal impacts of casino facilities at the local, regional and state level:
 - Business dynamics
 - Labor market conditions
 - Government finance
 - Real estate trends
 - Special topics



Phases of Economic Analysis

- **Baseline analyses**
 - Tracking economic and fiscal conditions before gaming facilities
- **Development/Construction**
 - Measuring impacts as construction occurs at each gaming facility
- **Operations**
 - Measuring and monitoring impacts from operations of gaming facilities

Economic and Fiscal Research: Scope of Work



FY17's Reports

- **Real estate analysis**—baseline conditions in host and surrounding communities
- **Lottery sales analysis**—first year of casino impacts
- **Plainridge Park Casino (PPC) construction** economic impacts
- **PPC new employees**—findings from survey data
- **PPC patron survey**—profile of spending behavior in the first year
- **PPC operating impacts** in its first year
 - Operating impacts
 - Government fiscal impacts
 - Patron spending impacts

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What is SEIGMA?

The University of Massachusetts Amherst School of Public Health & Health Sciences (SPHHS) has been engaged by the Massachusetts Gaming Commission (MGC) to carry out a comprehensive, multi-year research project, believed to be the first of its kind, on the economic and social impacts of introducing casino gambling in Massachusetts. The project fulfills Section 71 of the 2011 Expanded Gaming Act, which requires the MGC to establish “an annual research agenda” to assist in understanding the social

News and Events



**SEIGMA team
will present
findings at
community
forum in Springfield**

Major Components of Work:

TRACKING CASINO IMPACTS: COLLECTING NEW DATA

Tracking Casino Impacts through New Data Collection Efforts

Four reports this year relied on primary data collection:

- PPC Construction Impacts
- New Employee Survey
- Patron Survey
- PPC Operating Impacts

Primary Data for REMI Model from Operators, Patrons and Government

- Construction spending and supply chain
- Employment and home location
- Wages
- Gross gaming revenues
- Non-gaming revenues
 - Hotel
 - Food and Beverage
 - Retail
- Patron spending both in-and out-of-state (to calculate recapture and reallocation)
- Casino supply chain and vendor spending
- New revenues for state and local governments

SEIGMA Project

PPC CASINO OPERATION: ECONOMIC IMPACTS

Presentation Topics:

- Introduction to the Study
- Model Inputs – Primary Data
 - Employment and Wages
 - Vendor Spending
 - Public Sector Impacts
 - Changes in Consumer Spending
- Model Output – Findings
- Conclusion

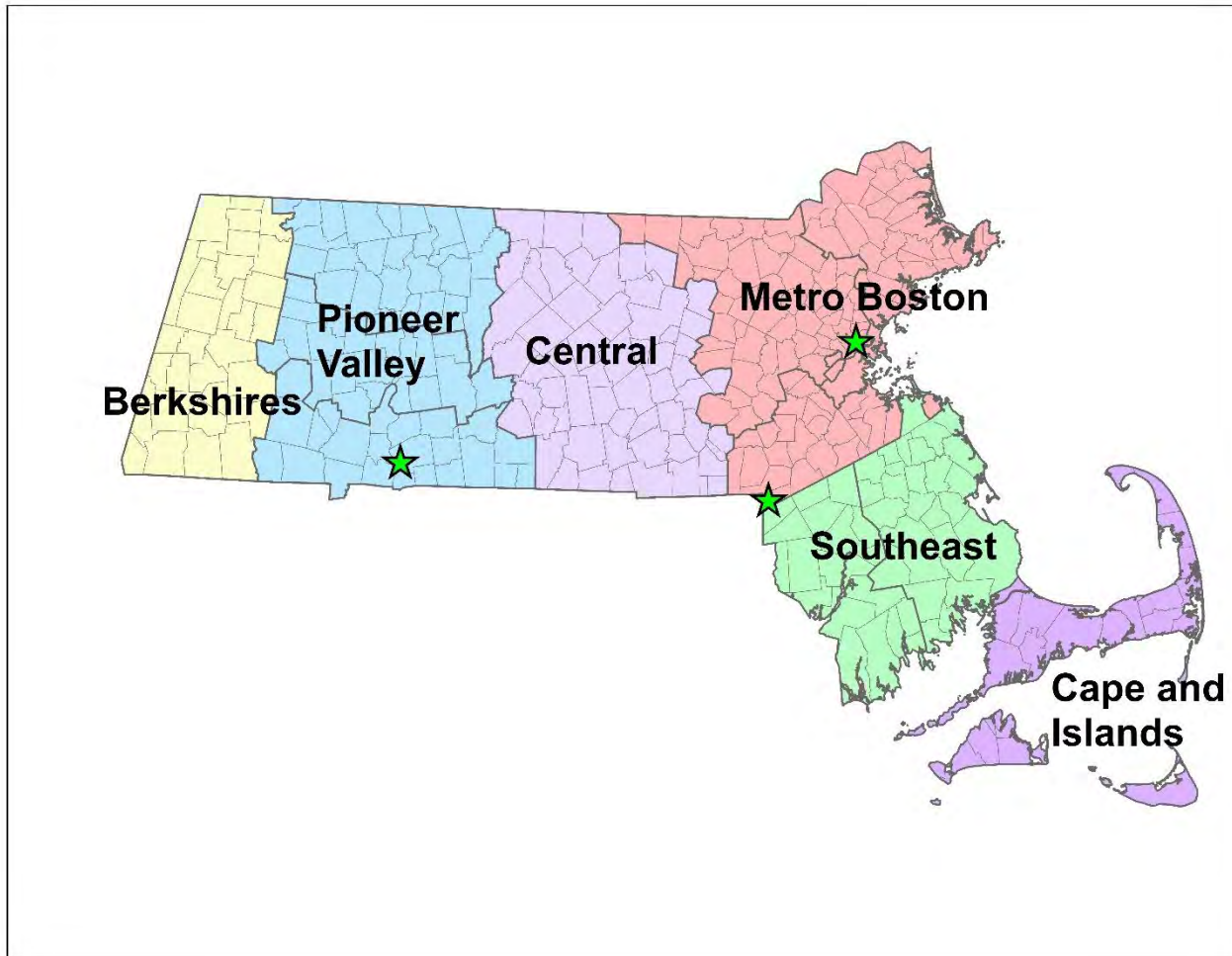
Plainridge Park Casino (PPC)



Summary of Findings

- About 556 year-round employees and \$17.8 million in wages
- Vendors, governments, and other entities received \$30.2 million in payments, \$19.2 million in MA
- Approximately \$3.9 million spent off-site by patrons
- At least 2,416 jobs supported statewide
- Over half of the statewide employment impact is from government spending
- Most on-site spending is new or recaptured

Economic Modeling Exercise



Model Inputs

- Data collected for the model include:
 - Employment data from PPC (employees, wages, hours worked, places of residence)
 - PPC expenditure data (vendor spending, payments to government entities, etc.)
 - Gross gaming revenue (GGR) from the MGC
 - Estimated change in consumer spending from SEIGMA Patron Survey

Employment

Employment at PPC, Year One

Region	Hires	Hours Worked	Wages Paid
Metro Boston	229	254,019	\$5,089,465
Southeast	364	401,127	\$6,229,344
Central	40	42,003	\$740,097
Rest of Massachusetts	4	5,372	\$109,246
Rest of Nation / World	256	292,428	\$5,640,544
Total	893	994,949	\$17,808,697

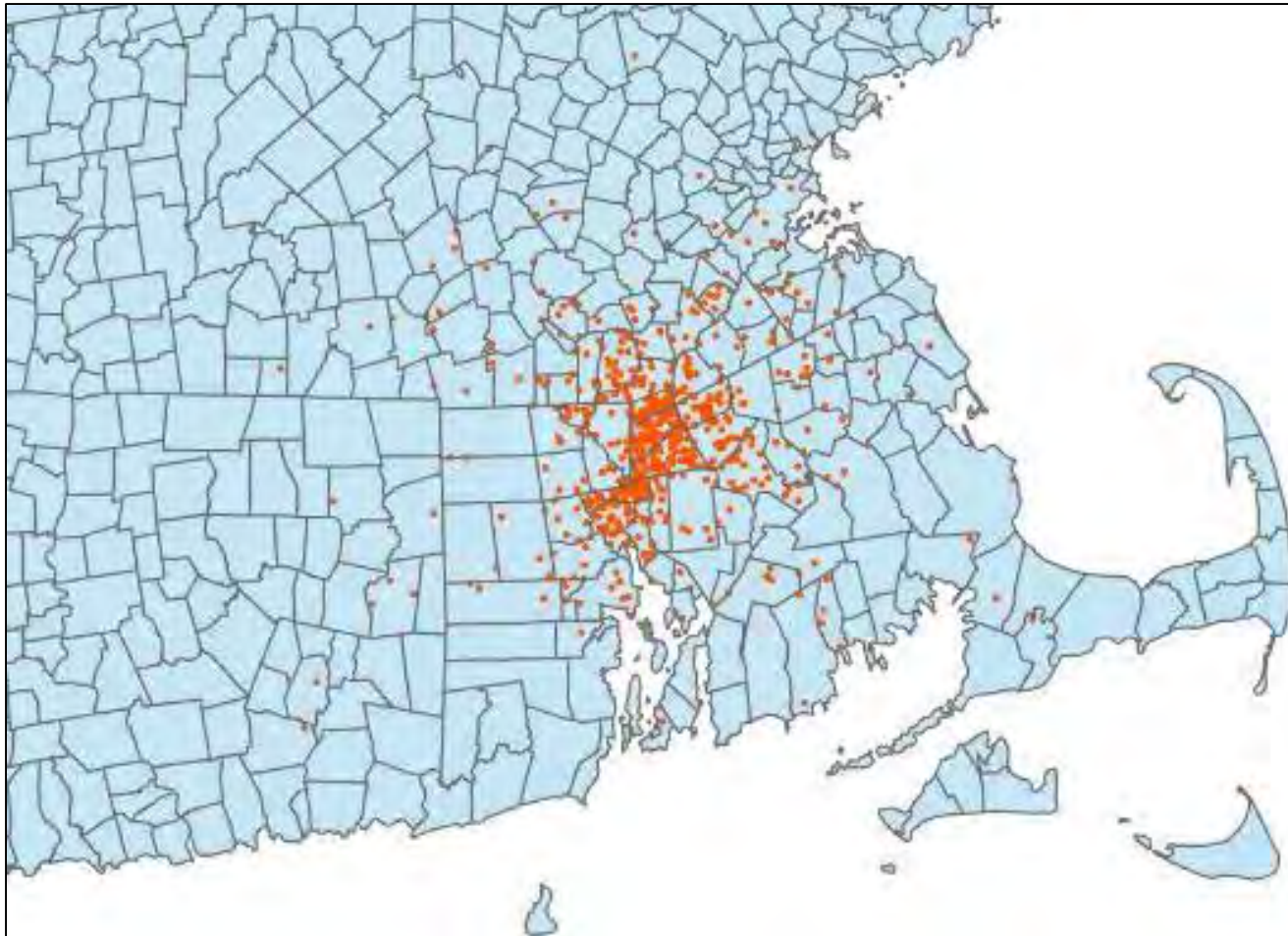
Full Time vs Part Time Employment at PPC

Full Time/Part Time Status	Hires	Hours Worked	Wages Paid
Part Time	320	181,928	\$2.4 M
Full Time	573	813,020	\$15.3 M
Total	893	994,949	\$17.8 M

Place of Residence for PPC Employees

City/Town	REMI Region	Hires	Share of Hires
Attleboro, MA	Southeast	88	9.9%
North Attleboro, MA	Southeast	86	9.6%
Plainville, MA	Metro Boston	53	5.9%
Pawtucket, RI	Rest of Nation / World	53	5.9%
Providence, RI	Rest of Nation / World	39	4.4%
Mansfield, MA	Southeast	35	3.9%
Norton, MA	Southeast	30	3.4%
Taunton, MA	Southeast	29	3.2%
Franklin, MA	Metro Boston	28	3.1%
Wrentham, MA	Metro Boston	28	3.1%
All Other Places		424	47.5%
Total		893	100.0%

Place of Residence for PPC Employees

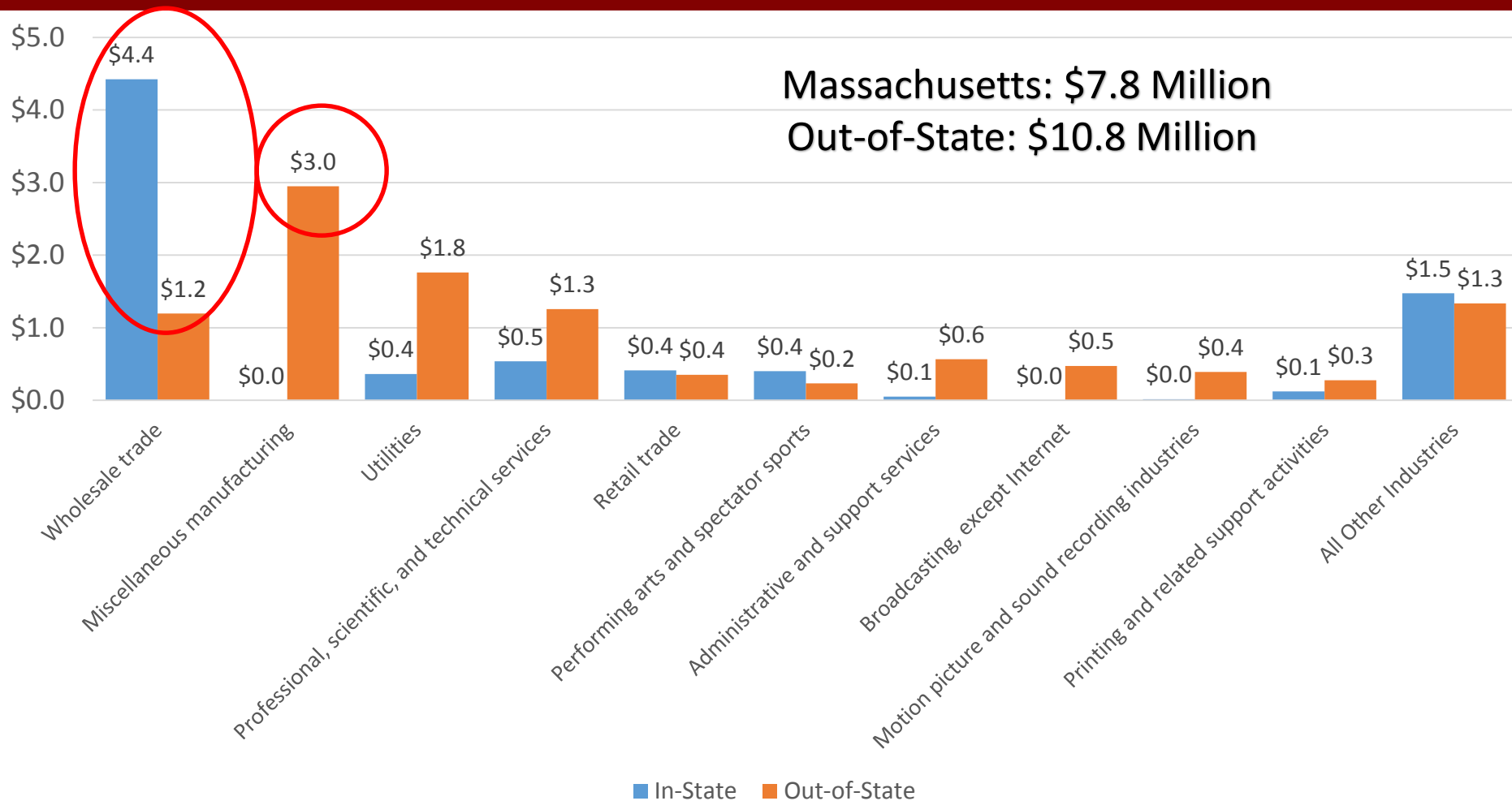


Vendor Spending and Payments to Government

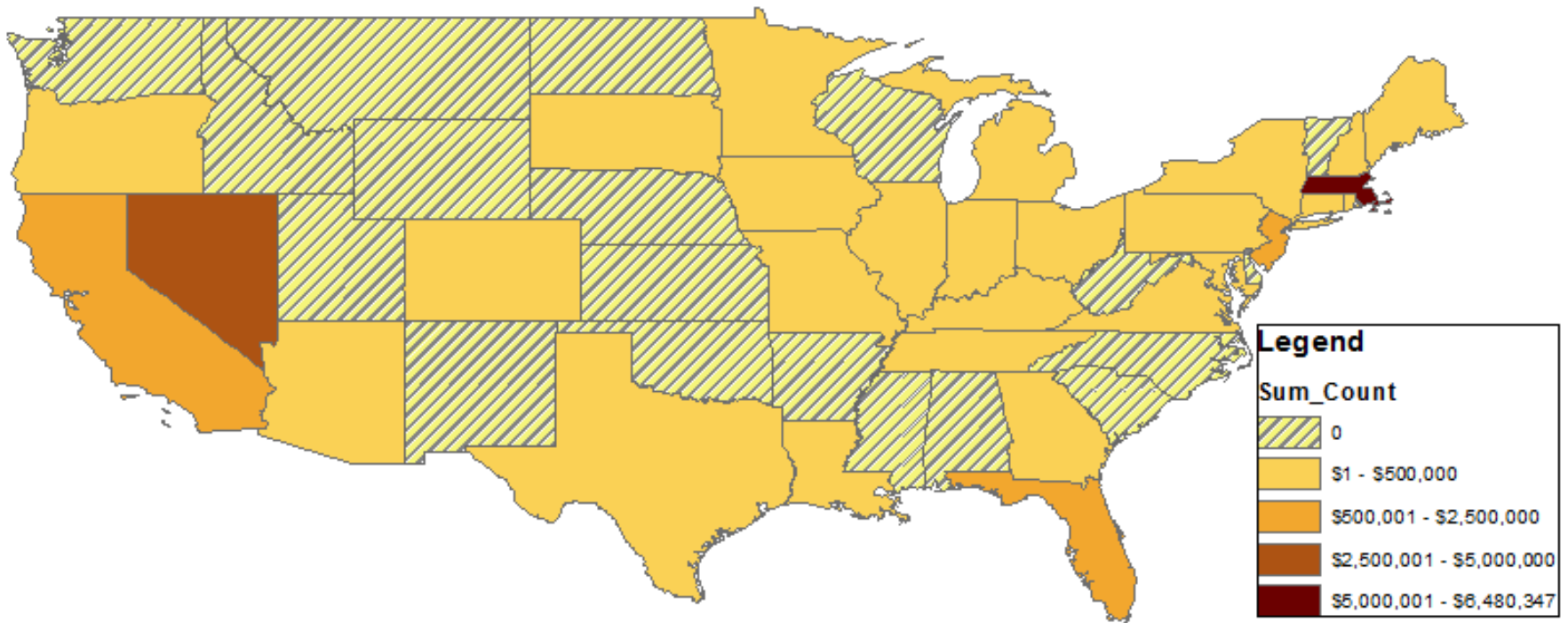
PPC Payments to Third Parties

Type of Payment	Amount	Share
Payments to Private Sector Vendors	\$18.6 M	61.3%
Payments to Government Entities	\$11.2 M	36.9%
<i>Federal Government Entities</i>	<i>\$921 K</i>	<i>3.0%</i>
<i>Massachusetts State Government Entities</i>	<i>\$5.9 M</i>	<i>19.4%</i>
<i>Other State Government Entities</i>	<i>\$23 K</i>	<i>0.1%</i>
<i>Local Government Entities</i>	<i>\$4.4 M</i>	<i>14.4%</i>
Payments to Unions and Other Membership Organizations	\$400 K	1.3%
Payments to Charitable Organizations	\$75 K	0.2%
Payments to Individuals	\$59 K	0.2%
Total	\$30.3 M	100.0%

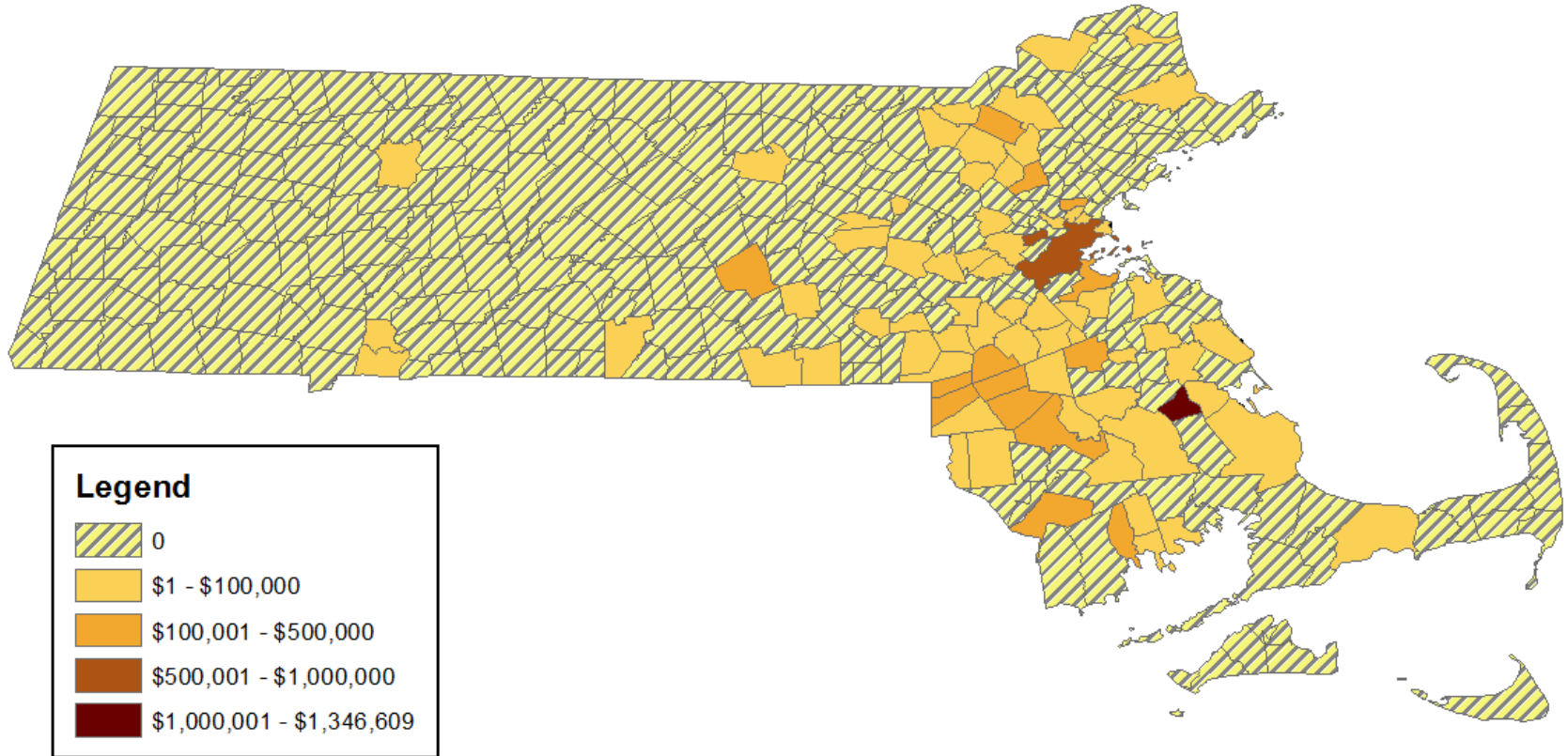
Top 10 Industries by PPC Vendor Spending



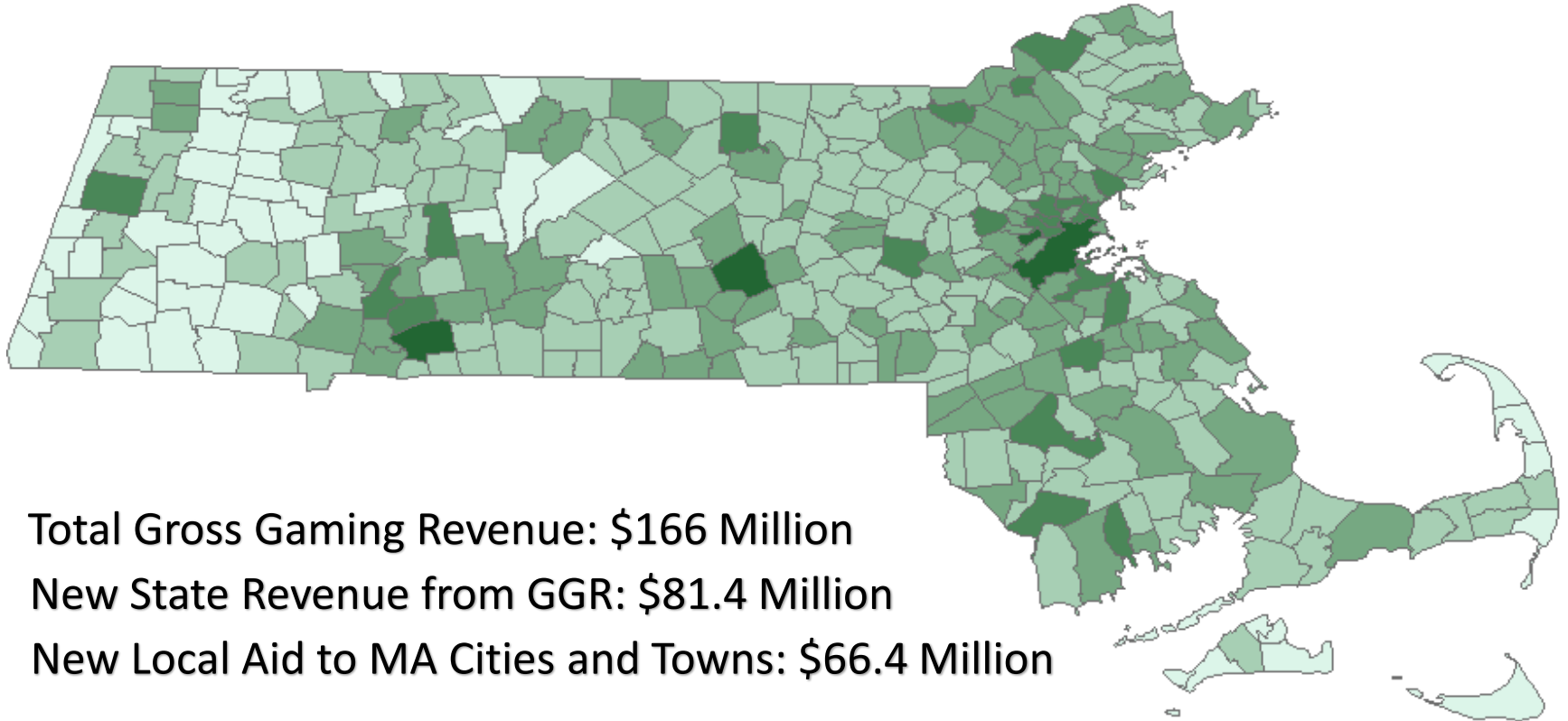
PPC Vendors by State



PPC Vendors in MA by Town



Distribution of Gross Gaming Revenue

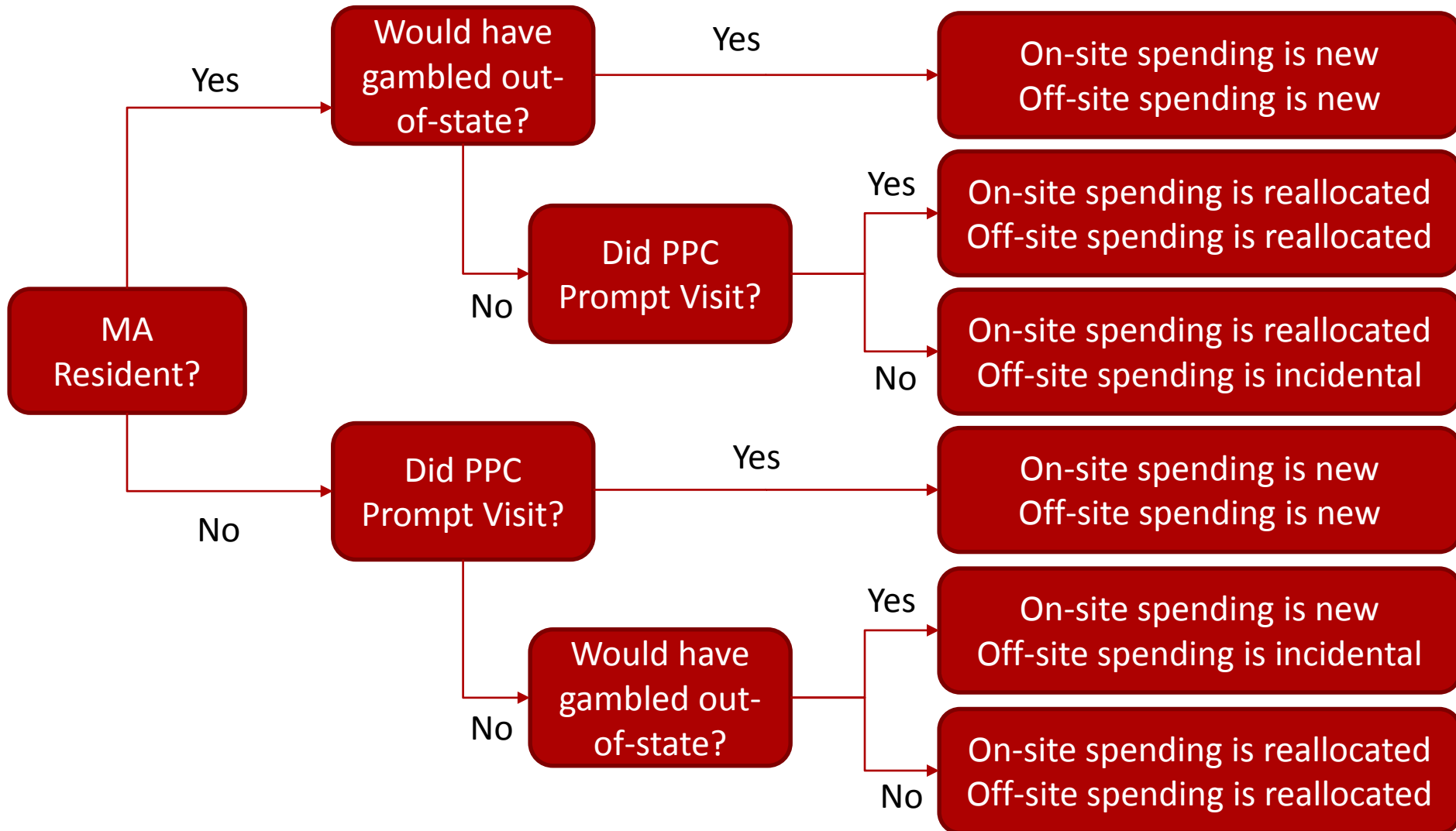


Patron Spending Including Tourism

Types of Patron Spending

- New: Would not have occurred in Massachusetts if PPC had never opened
 - Includes “recaptured” patrons and new tourists
- Reallocated: Would have occurred in Massachusetts, but on other goods and services.
- Incidental: Would have occurred whether or not PPC opened
 - Only off-site spending can be incidental

How Patron Spending is Assigned



Spending at PPC

\$166.0 million



On-Site Gaming
Spending

\$6.5 million



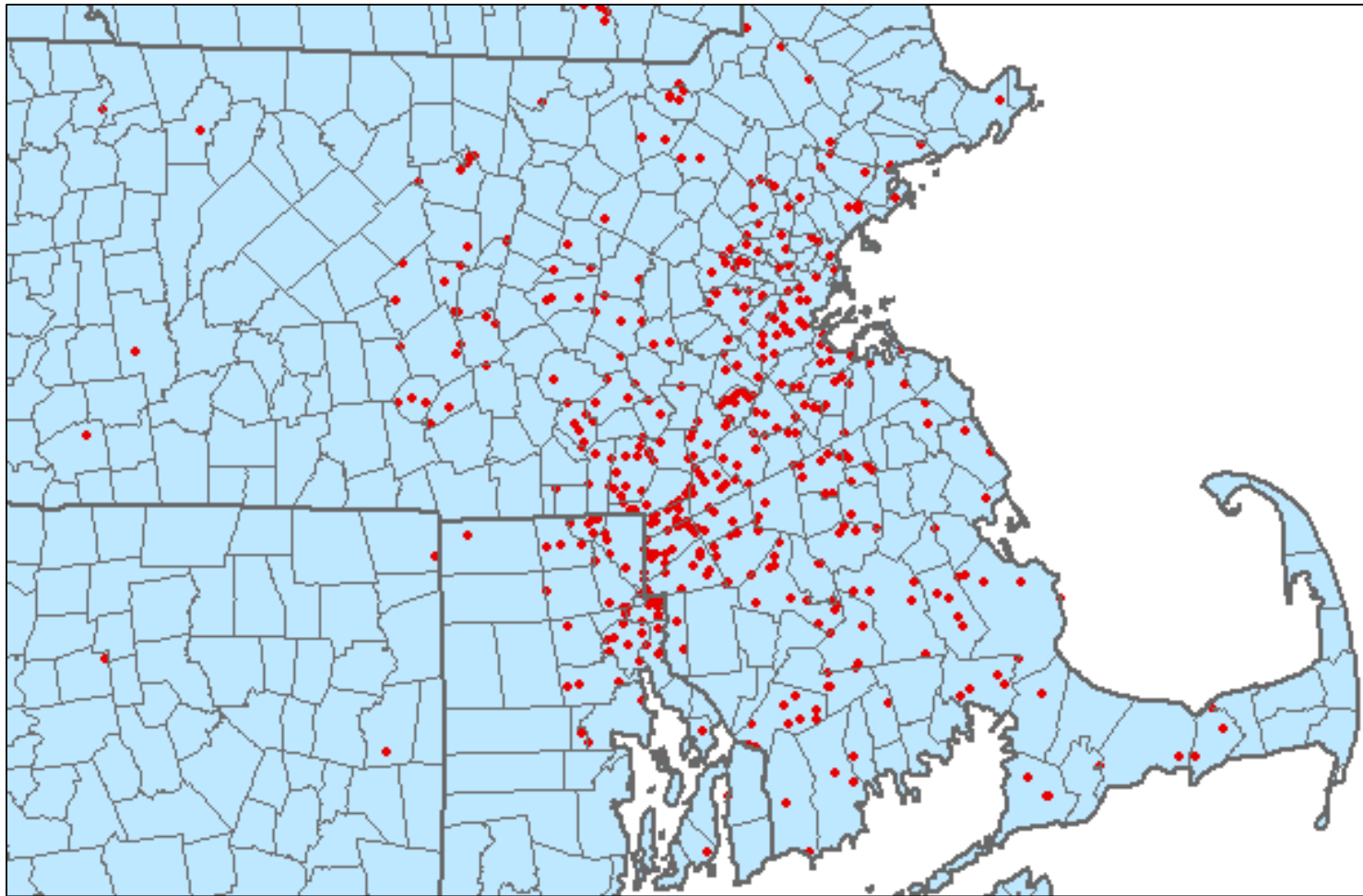
On-Site Non-
Gaming Spending

\$4.0 million



Estimated Off-Site
Spending

Patrons by Place of Residence



Patron Spending at PPC

Source of Spending	Spending (Millions of Dollars)	Share of Spending
Recaptured Spending by In-State Patrons	\$100.0	58.0%
Reallocated Spending by In-State Patrons	\$36.6	21.2%
Spending by Out-of-State Patrons	\$36.0	20.8%
Total	\$172.5	100.0%

Patron Spending at PPC (Gambling)

Source of Spending	Spending (Millions of Dollars)	Share of Spending
Recaptured Spending by In-State Patrons	\$96.7	58.3%
Reallocated Spending by In-State Patrons	\$33.9	20.4%
Spending by Out-of-State Patrons	\$35.5	21.4%
Total	\$166.0	100.0%

Patron Spending at PPC (On-Site Non-Gambling)

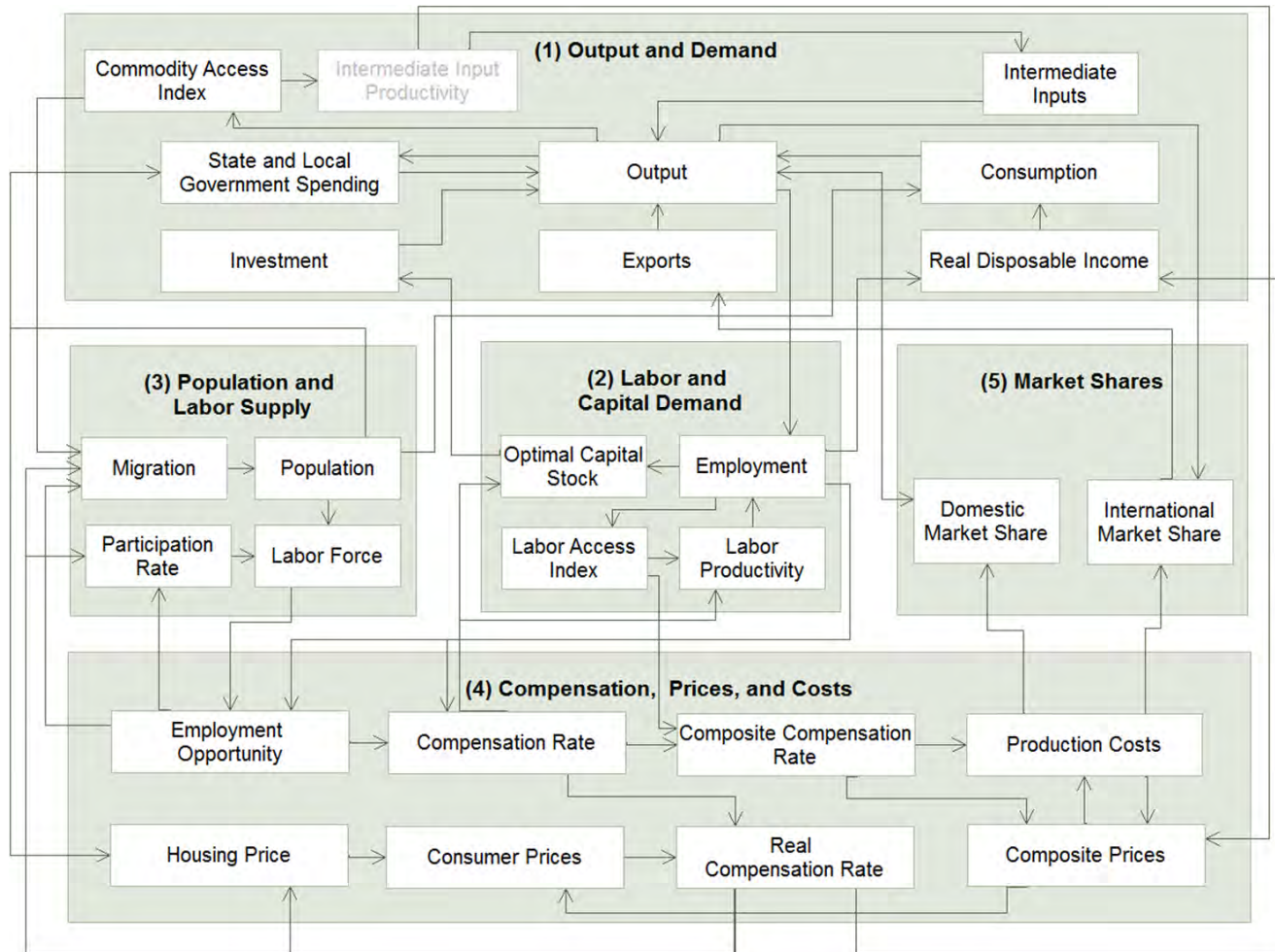
Source of Spending	Spending (Millions of Dollars)	Share of Spending
Recaptured Spending by In-State Patrons	\$3.3	50.4%
Reallocated Spending by In-State Patrons	\$2.7	41.7%
Spending by Out-of-State Patrons	\$0.5	7.9%
Total	\$6.5	100.0%

Patron Spending at PPC (Off-Site Non-Gambling)

Source of Spending	Spending (Millions of Dollars)	Share of Spending
Recaptured Spending by In-State Patrons	\$2.0	49.2%
Reallocated Spending by In-State Patrons	\$1.2	29.7%
Spending by Out-of-State Patrons	\$0.9	21.1%
Total	\$4.0	100.0%

Summary of Economic Impacts

The REMI PI+ Model



REMI Outputs for First Year of Operation

Economic Impacts	Total Employment	Private Non-Farm Employment	Output	Value Added	Personal Income
<i>Regional Operating Impacts:</i>					
Metro Boston	1,896	1,466	\$447.0	\$326.3	\$98.7
Southeast	376	247	\$48.3	\$29.9	\$31.7
Pioneer Valley	189	80	\$23.1	\$14.5	\$10.3
Central	231	131	\$30.2	\$18.7	\$17.4
Berkshires	27	11	\$3.2	\$2.0	\$1.4
Cape and Islands	38	29	\$4.6	\$2.9	\$2.8
Total	2,758	1,964	\$556.4	\$394.4	\$162.2
<i>Statewide Impacts from Changes In Consumer Spending</i>					
Total	-340	-331	-\$50.9	-\$31.9	-\$18.5
<i>Statewide Net Impacts</i>					
Total	2,417	1,633	\$505.5	\$362.4	\$143.7

Employment Impacts: Private and Public Sector Jobs

Source of Employment Demand	Employment Impact
Employment Impacts from Private Sector Activity	778
Employment Impacts from Government Spending	1,639
Total Employment Impacts	2,417

Next Steps in Econometric Modeling

- Primary data collection
- Construction data collection
- Operating analysis (fact sheets)

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Thank you!

Questions and Comments



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Plainridge Park Casino First Year of Operation: Economic Impacts Report

October 6, 2017

Thomas Peake and Rod Motamedi

University of Massachusetts Donahue Institute, Economic and Public Policy Research Group

Authorship

Thomas Peake, Research Analyst at the UMass Donahue Institute (UMDI) and member of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project team.

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Acknowledgements

Support for this study came from the Massachusetts Gaming Commission under ISA MGC10500003UMS15A establishing the Social and Economic Impacts of Gambling in Massachusetts study. This multi-year project was competitively bid via the Massachusetts Gaming Commission Request for Response (MGC-RA-2012) for Research Services and awarded to the University of Massachusetts Amherst in April 2013.

We would like to thank Mark Vander Linden, Director of Research and Responsible Gaming, Jill Griffin, Director of Workforce, Supplier, and Diversity Development, Derrek Lennon, the Gaming Commission's Chief Finance and Accounting Officer, and David Borges, from the University of Massachusetts, Dartmouth, whose insight and careful review of draft versions of this report contributed to its clarity as well as utility to multiple audiences. Finally, we would like to thank Plainridge Park Casino and Lisa McKenney, Plainridge Park Casino's Compliance Officer, for their cooperation, which allowed for the creation of this report.

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Executive Summary

The purpose of the current Operating Report is to estimate the full economic impact of the first year of operations of the Plainridge Park Casino (PPC) on the Massachusetts economy. In order to do that, the UMass Donahue Institute’s Economics and Public Policy Research unit (UMDI) looked at two key aspects of operational effects. First, we worked directly with PPC to determine the economic footprint of PPC’s operations, including employment, wages, vendor spending, and fiscal impacts from taxes and other assessments paid to the state. Second, we analyzed the way that shifts in patron spending as a result of the expansion of gaming would affect the state. To do this analysis, UMDI employed the PI+ model from Amherst, MA-based Regional Economic Models Inc. (REMI) to estimate the direct and spin-off effects in the Massachusetts economy associated with casino operations and patron spending.

In Plainridge Park Casino’s first full 12 months of operation (July 2015 through June 2016), patrons spent approximately \$172.5 million on gambling and non-gambling activities at the facility.¹ In order to understand how that spending impacts the economy of the Commonwealth, it is critical to understand how these patrons would have interacted with the Massachusetts economy had Plainridge Park Casino never opened. Based on a survey administered on-site and described in some detail later in the report – and in greater detail in SEIGMA’s *Patron and License Plate Survey Report: Plainridge Park Casino 2016* – UMDI was able to estimate that the majority of spending at PPC, \$100 million, was spent by Massachusetts residents who, in the absence of PPC, would have spent their money gambling at an out-of-state casino. From a policy standpoint, the significance of these “recaptured” patrons is that it is essentially “new” money to the Commonwealth since these patrons would have otherwise spent their money in another state.² Another \$36.6 million in spending, just over a fifth of total on-site spending, was spent by Massachusetts residents who otherwise would have spent their money elsewhere in Massachusetts. The economic impact of these patrons is more nuanced than with the recaptured patrons. Since their spending has been reallocated from other Massachusetts businesses to PPC, any positive economic impact which comes from an increase in revenue at PPC is accompanied by a negative impact elsewhere in the Commonwealth.

Table 1: Sources of Spending at Plainridge Park Casino

Source of Spending	Estimated Spending (Millions of Dollars)	Share of Spending
Recaptured Spending by In-State Patrons	\$100.0	58.0%
Reallocated Spending by In-State Patrons	\$36.6	21.2%
Spending by Out-of-State Patrons	\$36.0	20.8%
Total	\$172.5	100.0%

Source: SEIGMA Patron Survey

The remaining \$36.0 million was spent by out-of-state residents. The extent to which UMDI considers their spending to be new to Massachusetts is largely a function of whether or not they would have visited Massachusetts in the absence of PPC. For more detail on patron spending behavior and its

¹ Table 15 on Page 22 and the description of data preparation on Page 35 provide more detail on this number.

² For the purposes of this report, “new” economic activity means economic activity new to the Commonwealth of Massachusetts. While Massachusetts residents choosing to spend their money in a Massachusetts casino rather than an out-of-state facility might be considered a simple reallocation of funds from one business to another from a national perspective, it is new to the state. Given the scope of our work, this report considers this money new.

impact on Massachusetts, see the section of the report titled, *Changes in Consumer Spending: Patrons and Their Spending Patterns*.

Table 2 details the types of economic activity which informed UMDI’s analysis. These data give a high-level summary of the basis for our economic modeling exercise. Using survey data and primary data from PPC, UMDI sought to capture any economic activity that would not have occurred in the Commonwealth if the casino had not opened. These economic activities were used as inputs into a REMI PI* economic model, which calculated the total economic impacts of this new activity.

The revenue described above enabled PPC to employ an average of 556 employees over the course of the fiscal year and pay \$17.8 million in wages in fiscal year 2016. During the same period, PPC also supported \$19.1 million in spending on vendors, membership organizations, and charitable causes. As part of Massachusetts’ Expanded Gaming Act, 49% of PPC’s gross gaming revenue is levied by the state for taxes and support for horse racing. These assessments are in addition to normal federal, state, and local taxes. PPC has also entered into various agreements with the host community of Plainville, Massachusetts and the surrounding communities of Attleboro, North Attleborough, Foxborough, Mansfield, and Wrentham. Some of these agreements include payments to the communities. Taken together, Plainridge Park Casino spent \$77.6 million in payments to various Massachusetts government entities in fiscal year 2016. Finally, visitors to PPC spent an estimated \$3.2 million in the Plainville area in the course of visiting the casino. This is money which would have been spent elsewhere if PPC had not opened.

Table 2: Summary of Primary REMI Inputs

Measure	Units	Value
Average Employment	Jobs	556
Total Wages	Millions of Dollars	\$17.8
Intermediate (e.g. B2B) Spending	Millions of Dollars	\$19.1
Government Revenue	Millions of Dollars	\$77.6
Estimated New Off-Site Spending	Millions of Dollars	\$3.2

Source: Plainridge Park Casino

Table 3 shows how the economic impacts of PPC were distributed around the state. While the analysis which produced these estimates used sub-state inputs and produced sub-state outputs, data related to consumer spending are only reported at the statewide level due small sample sizes in some regions of different types of patrons.³

In its first year of operation, the direct employment, wages, vendor spending, and fiscal activity associated with Plainridge Park Casino generated a total of 2,758 jobs, with 1,964 of those jobs existing in the private sector. Just over two-thirds of that employment impact occurred in the four-county Metro Boston region, which includes Norfolk County and the Town of Plainville. This new economic activity was partially paid for by a decline in existing spending on other goods and services in Massachusetts as

³ As an example, we are reasonably confident in the total amount of money spent on gambling at the casino which has been reallocated from activity elsewhere in Massachusetts (\$36.6 million). While our model allows us to estimate where these patrons live, and by extension, where they would have spent their money if not for the expansion of gaming, these geographic estimates are considerably more unreliable than the total estimates. As a result, economic model outputs, which are significantly informed by these data, are presented at the state level.

casino patrons shifted their spending away from other activities and towards PPC, leading to a loss of support for an estimated 340 jobs. On net, PPC created or supported 2,417 jobs in the Commonwealth, 1,633 of which were in the private sector.⁴ The remainder were government positions supported by the revenue generated by PPC. The casino also supported \$143.7 million in new personal income and \$505.5 million in new output within the Massachusetts economy, of which \$362.4 million was value added (i.e., net new economic activity or gross state product).

Table 3: Economic Impacts of Plainridge Park Casino by Region

Region	Total Employment	Private Non-Farm Employment	Output (\$M)	Value Added (\$M)	Personal Income (\$M)
<i>Regional Operating Impacts:</i>					
Metro Boston	1,896	1,466	\$447.0	\$326.3	\$98.7
Southeast	376	247	\$48.3	\$29.9	\$31.7
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Total	2,758	1,964	\$556.4	\$394.4	\$162.2
<i>Statewide Impacts from Changes In Consumer Spending:</i>					
Total	-340	-331	-\$50.9	-\$31.9	-\$18.5
<i>Statewide Net Impacts:</i>					
Total	2,417	1,633	\$505.5	\$362.4	\$143.7

Source: Regional Economic Models, Inc., UMDI Calculations

Broadly speaking, PPC’s impact on Massachusetts can be split into two parts. One part is the private sector activity resulting from PPC, including new employment and wages, intermediate spending on vendors, and reallocation of patron spending, either from out-of-state casino spending or from in-state consumption of other goods and services. The other part is the economic activity resulting from new state and local government spending made possible by revenue from PPC. Ultimately, while the private sector activity at PPC had both positive and negative impacts on each region of the Commonwealth, the majority of new employment outside of the immediate host region was the result of new tax revenue from PPC being spent across the state.

Table 4 shows the shares of employment impacts associated with private sector activity and government spending.

⁴ Certain aspects of PPC’s operation were not modeled due to technical or data limitations. These include impacts resulting from new federal revenue or new sales for out-of-state vendors, as well as any impacts from the Massachusetts Gaming Commission’s Race Horse Development Fund. As a result, the output presented in this report may slightly underestimate the true economic impact of PPC.

Table 4: Employment Impacts from Public and Private Sector Activity

Source of Employment Demand	Employment Impact	Share of Total Impact
Employment Impacts from Private Sector Activity	778	32%
Employment Impacts from Government Spending	1,639	68%
Total Employment Impacts ⁵	2,417	100%

Source: Regional Economic Models, Inc., UMDI Calculation

The employment impacts from PPC were largest in PPC’s own industry (Amusement, gambling, and recreation). This sector, however, did not see a substantial change beyond the direct employment at PPC. Other industries affected by the casino are a mixture of industries which are heavily represented in PPC’s vendor spending (also see Table 11). These include professional, scientific, and technical services, administrative and support services, and wholesale trade. Industries which are associated with an increase in general consumer spending, such as construction, retail trade, food services and drinking places, and real estate, were also affected by PPC vendor spending.

Table 5: Top 10 Industries by Statewide Employment Impact

Employment Impact by Industry Sector (Top Ten Industries)	Employment
Amusement, gambling, and recreation	560
Construction	281
Retail trade	104
Professional, scientific, and technical services	100
Administrative and support services	81
Food services and drinking places	62
Ambulatory health care services	43
Real estate	40
Wholesale trade	40
Personal and laundry services	28
All other industries	294
Total Private Non-Farm Employment	1,633

Source: Regional Economic Models, Inc., UMDI Calculation

To recap, less than a quarter of the jobs created or supported by the opening of PPC were actually at the facility. The majority of the employment impact related to PPC is the result of new state and local government spending due to the revenue collected on PPC’s gross gaming revenue. While an estimated 340 jobs were lost statewide as consumers shifted their spending towards PPC, that number was somewhat lower than expected, due to the majority of casino spending coming from “recaptured” patrons.

⁵ The rows in Table 4 are the result of three distinct REMI simulations: 1) only private sector variables, 2) only public sector variables, and 3) all variables. Since the REMI PI+ model is a dynamic economic impact model where variables interact with one another in the course of calculating impacts, the first two rows should not be expected to add up to the last.

Introduction

The UMass Donahue Institute (UMDI) is a member of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) project team that has been charged with carrying out aspects of the research agenda of the Massachusetts Gaming Commission (MGC). A remarkable aspect of the MGC's research agenda is the opportunity to measure the actual economic outcomes of the casino facilities as they are built and carry out operations in the state. This report describes the activities undertaken by Plainridge Park Casino (PPC) in Plainville, Massachusetts in its first 12 full months (July 2015 through June 2016) of operation and measures the economic impacts generated in this first year.

In November of 2011, Governor Deval Patrick signed the Expanded Gaming Act, which allows for the creation of up to three commercial resort-style casinos and one slot parlor.⁶ To reduce internal competition among casinos and maximize their potential benefits, the Commonwealth was divided into three regions, shown in Figure 2, with each region able to attract only one full casino license. The slot parlor license was not geographically limited. To date, two full licenses in Regions A and B and the slots license have been awarded as shown in Figure 3. Plainridge Park Casino – the subject of this report – is the singular slot parlor and the only venue currently operating. The status of the Region C casino license is complicated by the MGC's decision to not award a license to the only commercial bidder, which hoped to open in Brockton.⁷ The status of the Region C license is further complicated by a recent U.S. District Court ruling invalidating the land in trust granted to the Mashpee Wampanoag tribe for a casino in nearby Taunton.⁸

Recognizing that the introduction of casinos will create both positive and negative social and economic effects, Section 71 of the Expanded Gaming Act includes a mandate for the Massachusetts Gaming Commission to establish “an annual research agenda.”⁹ To facilitate this research, the MGC sought bids through a competitive process, which was won by SEIGMA, a team led by researchers at the UMass Amherst School of Public Health and Health Sciences.¹⁰ The role of UMDI in the larger SEIGMA project is to collect data on and measure the economic impacts of the introduction of casinos in Massachusetts.

Plainridge Park Casino is located in the northeast corner of Plainville, Massachusetts near the intersection of Route 1 and Interstate 495. This site was formerly the home of Plainridge Racecourse, which has now been integrated into the casino facility. The final structures on the casino property include the racetrack used for harness racing, a grandstand and simulcast building, the casino, and a parking garage.

⁶ <<http://massgaming.com/about/expanded-gaming-act>>

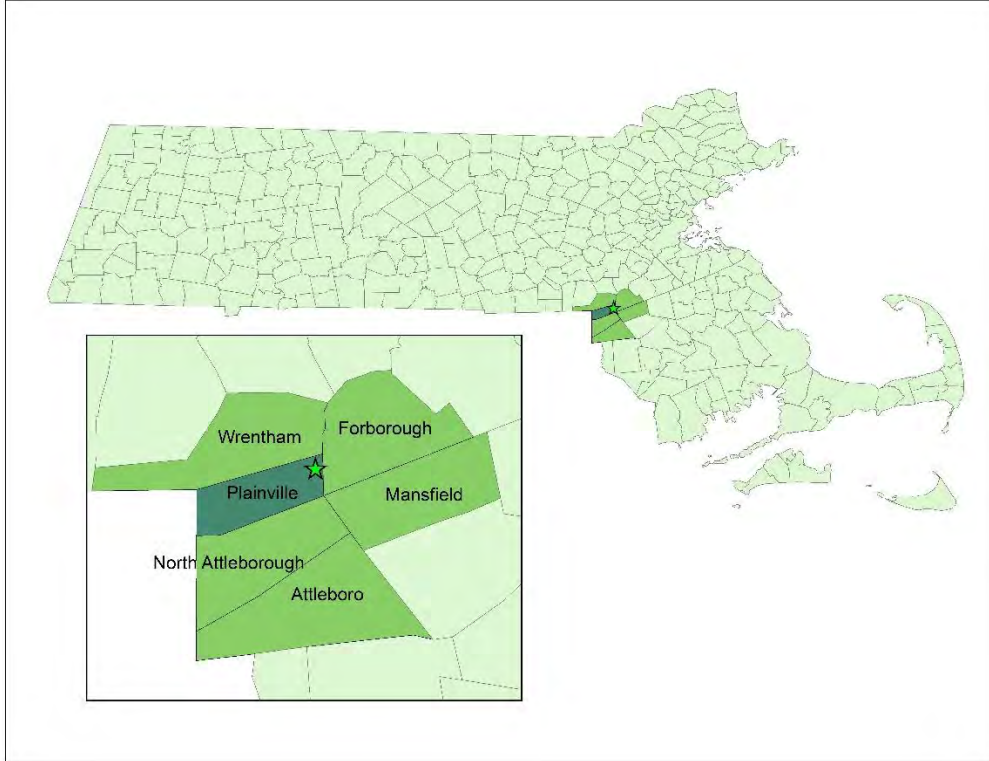
⁷ <http://massgaming.com/wp-content/uploads/16-025RegionC.pdf>

⁸ https://www.gpo.gov/fdsys/pkg/USCOURTS-mad-1_16-cv-10184/pdf/USCOURTS-mad-1_16-cv-10184-0.pdf

⁹ <<http://massgaming.com/about/research-agenda>>

¹⁰ An overview of the research plan can be found on the MGC's website: < <http://massgaming.com/wp-content/uploads/SEIGMA-Research-Plan.pdf>>

Figure 1: Location of Plainridge Park Casino, Plainville, and Surrounding Communities

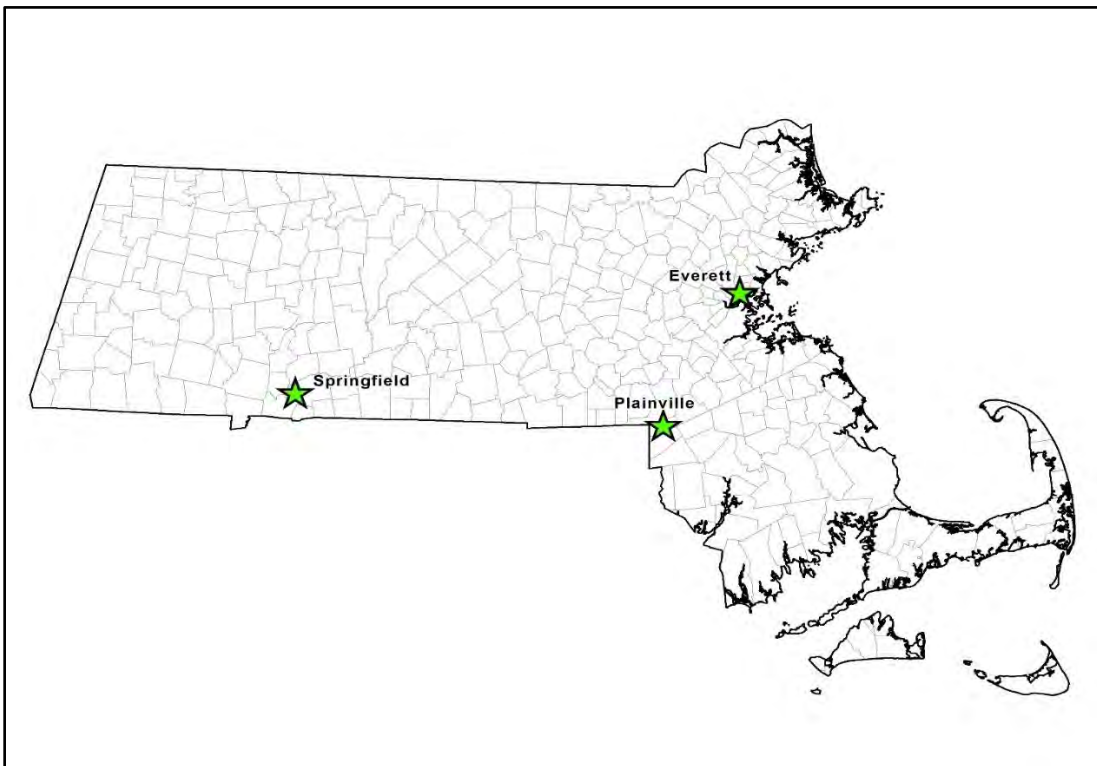


This report seeks to inform stakeholders about Plainridge Park Casino’s first year of operation and its economic contribution to the Commonwealth. Since Plainridge Park Casino began operations in June of 2015, UMDI has worked with PPC and the MGC to obtain data on employment, wages, spending, and government revenue related to the operation of PPC. UMDI also assisted in designing a survey of patrons, which other members of the SEIGMA team administered on-site at PPC on eight occasions during the first 12 months of operation. These data are presented in this report along with an estimate of the total economic impacts to the Commonwealth of Massachusetts resulting from PPC’s first year of operation.

Figure 2: Massachusetts Gaming Regions¹¹



Figure 3: Locations of Approved Massachusetts Casinos



¹¹ <<http://massgaming.com/about/expanded-gaming-act>>

Glossary for Economic Impacts

In this section, UMDI defines terms common to economic modeling and analysis that are used in this report. They are as follows:

Employment: Employment is a count of jobs, not people, by place of work. It counts all jobs with the same weight regardless of whether the position is full- or part-time or the labor of a self-employed proprietor. Additionally, jobs are counted as job-years, which are equivalent to one job lasting for one year. This is a similar concept to “person-hours.” Jobs often carry over from year to year and therefore the jobs in one year include many of the same jobs as in the previous year. For example, if a new business opens with 10 employees then the host community of that business will have 10 more jobs than it would have had in every future year that the company maintains its workforce. Over 5 years, the business will have created 50 job-years (10 jobs at the company x 5 years = 50 job-years) though it is possible that it is not the same 10 people who are working there over time. When reviewing changes in employment across multiple years, knowledge of the concept of job-years is vital to proper interpretation.

Output: Output is the total economic value of production, sales, or business revenues, whether final (i.e., purchased by the end user) or intermediate (i.e., used by another business to produce its own output). It includes the value of inputs to production, wages paid to employees, capital expenses, taxes, and profit. It is useful as an indicator of business activity but it should not be construed as net new economic activity.

Personal Income: Personal income is income and benefits from all sources earned by all persons living in an area. It excludes the income earned by non-resident workers who commute into an area but includes the income of residents who commute out.

Value Added: Value added is the value of all final goods and services created in an economy. It represents new economic activity and is also known as gross product or net economic impact. It differs from output by the value of inputs to production. Value added provides a useful summary of the economy which is why all nations and US states report their economic growth in this way, calling it either gross domestic product or gross state product as appropriate. Its usefulness derives from the elimination of the double-counting inherent in output, which stems from the inclusion of inputs. An example of the double-counting of inputs can be found and simplified in the process of making and selling a loaf of bread. A farmer sells wheat to a mill, which then sells flour to a baker, who then sells bread to the final customer. The sale price of the bread includes the cost of all necessary inputs including growing the wheat, milling the flour, and baking the bread. Value added only counts the sale price of the bread to the final consumer which is the net new value created in the economy. On the other hand, output counts the revenues earned by every business in the supply chain which means that the value of the wheat and flour are counted more than once.

Methodology

Overview

The process of assessing economic impacts began with collecting primary data on any economic variable which was likely to change as a result of the casino's operations. Many of these measures were provided directly by PPC, including employment counts, wages, and detailed vendor spending data. Other data, such as information on the collection and disbursement of taxes on PPC's gross gaming revenue, was provided to UMDI from state government sources. Finally, data on patron behavior had to be collected by the SEIGMA team, which administered an on-site patron survey at PPC.

Patron Survey Methodology

SEIGMA members from both the social and economic teams collaborated closely on the Patron Survey, working together to create and implement the survey, and later to analyze the data and report on the findings. One of the important and unique aspects of this survey was the great lengths the team went to in order to capture a representative sample of patrons. This involved: (1) waiting 6-12 months after the casino opened to allow patronage volume and demographic characteristics to settle; (2) splitting the data collection between the winter and the summer to take account of potential seasonal differences in patronage; (3) spreading each data collection period over a two week time span; and (4) sampling during both peak and non-peak days as well as during peak and non-peak hours. The survey was conducted over the following eight days, dates, and times: Saturday, 2/20/2016, 12-4 pm; Monday, 2/22/2016, 6-10 pm; Saturday 2/27/2016, 6-10 pm; Monday, 2/29/2016, 12-4 pm; Saturday, 7/30/2016, 12-4 pm; Monday, 8/1/2016, 6-10 pm; Saturday, 8/6/2016, 6-10 pm; and Monday, 8/8/2016, 12-4 pm.

The unique approach was also reflected in the recruitment of patrons. Teams of surveyors, wearing UMass attire, were stationed at each of the three exits from PPC. The surveyors had three distinct roles, which they switched off every hour. **The counter** counted and kept a tally of all exiting patrons. When the sixth exiting patron was reached, **the solicitor** approached that patron and asked if they had 5-10 minutes to complete an anonymous, self-administered survey and receive a \$5 Dunkin Donuts gift card as compensation. If the patron indicated they were not exiting the facility (i.e., just going outside to smoke or use the ATM) the solicitor recorded a "non-exit." Importantly, if the patron declined to participate, the solicitor recorded, to the best of their ability, the gender, race, and age range of that patron. If the patron agreed to participate, the solicitor escorted the patron to the table where **the table monitor** provided more information about the survey and offered the patron the survey electronically (via SurveyGizmo) or on paper, depending on the patron's preference. The purpose of the self-administered format was to maximize the validity of responses to potentially sensitive questions (e.g., gambling expenditure, income).

The surveyors approached a total of 2,136 patrons exiting the casino and invited them to complete the survey. A total of 479 patrons agreed, and all 479 completed the survey, which represents a response rate of 22.4%. Response rates for individual questions were all above 88.5%.

The patron survey data were weighted to correct for sampling biases based on: (1) seasonality and period of the week and (2) certain types of people being more or less likely to answer the questionnaire. Weighting was done to make the sample more representative of the population of PPC patrons in the calendar year of 2016. The first step of the weighting procedure accounted for differences in patron volume based on season and weekday/weekend. This step in the weighting process was based on entry count data provided to the SEIGMA team by PPC. The entry counts track entries into the casino, but do

not distinguish unique patrons, since persons exiting and reentering the casino (i.e., for smoking, etc.) are counted each time they enter the casino. The entry counts also do not distinguish between patrons and PPC employees. The next step in the weighting process was done to establish the population characteristics during the sampling periods. This involved combining the age category, race/ethnicity category, and gender of people who completed the survey (and reported these demographic characteristics in their survey) with the age, race/ethnicity, and gender of people who declined to complete the survey (as recorded by the survey team). The demographics of people who completed the survey were then weighted to match the gender, race/ethnicity, and age range of the total population of casino patrons during the survey periods.

The reliability and validity of this step in the weighting procedure depends on the accuracy of the survey team in correctly identifying the age, gender, and race/ethnicity of refusals; this was examined using a rater accuracy test given to student surveyors, with an overall average of 86.1% correct identification. Based on the test performance of the raters, we concluded that it was reasonable to combine the demographic characteristics of people who completed the survey with the assessed demographic characteristics of people who refused to do the survey in order to establish the demographic characteristics of the total population of casino patrons during the survey periods. This allowed us to then create weights for the completed surveys so that their demographic profile (gender, race/ethnicity, and age range) matched the gender, race/ethnicity, and age range profile of the population of casino patrons.

More information about the Patron Survey, including methodology and weighting, the questionnaire, results, and summary findings, as well as the concurrent License Plate Survey, can be found in a separate report, *Patron and License Plate Survey Report: Plainridge Park Casino 2016*, which will be available on the SEIGMA website in October of 2017.

Economic Modeling Methodology

For this and future economic analyses, the SEIGMA team has chosen the PI⁺ model from Massachusetts-based Regional Economic Models, Inc. (REMI). PI⁺ generates realistic year-by-year estimates of the total regional effects of specific initiatives. Model simulations using PI⁺ allow users to estimate comprehensive economic and demographic effects created by economic events such as the development and operation of a casino within a region. PI⁺ allows economists to assess a variety of effects including economic impact analysis; changes in policies and infrastructure; and state and local taxes. REMI allows for dynamic, multi-year modeling as compared to other, more simplistic modeling systems. REMI thus has significant advantages for analysis of major complex initiatives that: (a) have time-series based impacts that are likely to vary over time; (b) require the use and interpretation of multiple economic variables; and (c) emphasize economic interactions between regions within the state that add up to a true state-level impact.

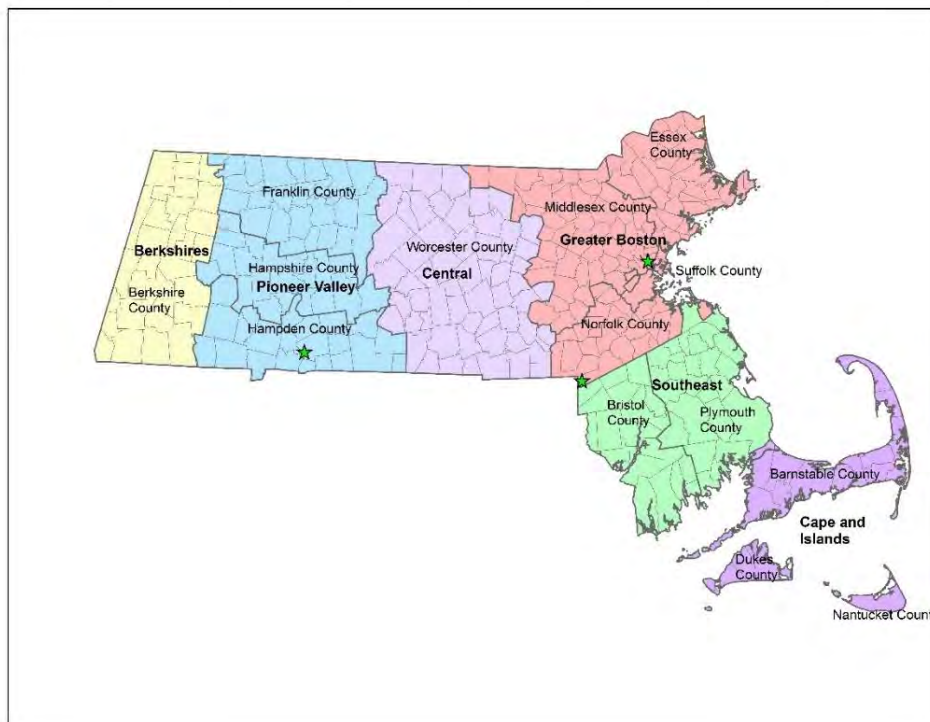
The REMI model purchased by SEIGMA is a 6 region, 70 sector model. Each of the 6 regions in the model is built from Massachusetts counties, and the 70 REMI industry sectors roughly correspond to the 3-digit codes of the North American Industry Classification System (NAICS). For the purposes of this study, PI⁺ used information on the economic concepts described above, all by region, to produce economic impact estimates. These inputs allow for the appropriate allocation of economic activity across the regions of the Commonwealth so that the model can calculate the total economic impacts for the state and show how activity in one region impacts others.

Appendices 1 and 2 at the end of this report provide more information on the PI⁺ model and the methods used to prepare the data for the model.

The detail and specificity of the data provided to UMDI allowed the modelers to replace some of the default assumptions of the model with project-specific information. For example, PI⁺ includes average wages by industry and region and the typical flows of goods and services among regions. The operations spending data on PPC included specific information on each of these areas and therefore allowed the use of actual reported data rather than industry and/or regional averages, which are needed in the absence of precise inputs. As previously noted, Appendices 1 and 2 provide detailed methodologies of the PI⁺ model and the data preparation.

For the purposes of this simulation, UMDI reconfigured the 6 REMI regions which would be used in the simulation.¹² The purpose of the reconfiguration was to describe Massachusetts using regional definitions which describe recognizable geographic and cultural regions of the Commonwealth, as well as to build regions which can be aggregated up to the MGC's designated gaming regions. One consequence of this is that Plainridge Park Casino now sits in the far southwestern corner of the Metro Boston Region, just to the north of the Southeast Region and just to the east of Rhode Island. Sitting on the border of such a large and economically diverse region could present some modeling problems in a less detailed study. Thanks to the richness and level of detail of our primary data, however, UMDI was able to overcome potential modeling problems associated with this regional layout.

Figure 4: REMI Regions



¹² Earlier analyses by UMDI used a different regional layout, which sought to center the approved casinos within each region.

Direct Impacts of Casino Operations

The most obvious way that Plainridge Park Casino changed the Massachusetts economy was by hiring staff, paying them wages, and purchasing intermediate goods and services. Casino operations refers to all of the economic activities that take place in the course of running the casino. PPC’s spending on its own staff supports their positions and creates new demand in Massachusetts as these employees spend their new paychecks. Beyond the casino, PPC’s spending on intermediate goods and services, such as food, slot machines, and performers, supports employment in other establishments, whose owners and employees then spend their earnings in turn. The following sections detail the ways in which PPC’s operation had a direct impact on the Massachusetts economy.

Employment and Wages

Over the course of PPC’s first year of operation, a total of 893 employees were hired. Of these employees, some worked full-time or even picked up overtime for the entirety of the year, while others worked for less than a week. Due to this discrepancy in tenure, the total number of hires is not an appropriate number for calculating employment. Instead, UMDI divided the total hours worked by employees by the average annual hours worked for a year-round employee based on data from the Bureau of Labor Statistics.¹³

Table 6 shows the regional distribution of PPC’s hires, as well as the associated hours worked and wages paid. While Plainville and PPC sit in the far southwestern corner of the Metro Boston region, the majority of hires at PPC were not from the Metro Boston region. In fact, both the Southeast region and the rest of the nation provided more hires to PPC than the Metro Boston region. This is unsurprising, as the adjacent parts of both the Southeast Region and next-door Rhode Island are more densely populated than the fairly suburban communities of Western Norfolk County, where Plainville is located.

Table 6: Plainridge Park Casino Hires, Hours Worked, and Wages Paid by Region

Region	Hires	Hours Worked	Wages Paid
Metro Boston	229	254,019	\$5,089,465
Southeast	364	401,127	\$6,229,344
Central	40	42,003	\$740,097
Pioneer Valley	1	2,200	\$44,384
Cape and Islands	3	3,172	\$64,862
Rest of Nation / World	256	292,428	\$5,640,544
Total	893	994,949	\$17,808,697

Source: Plainridge Park Casino

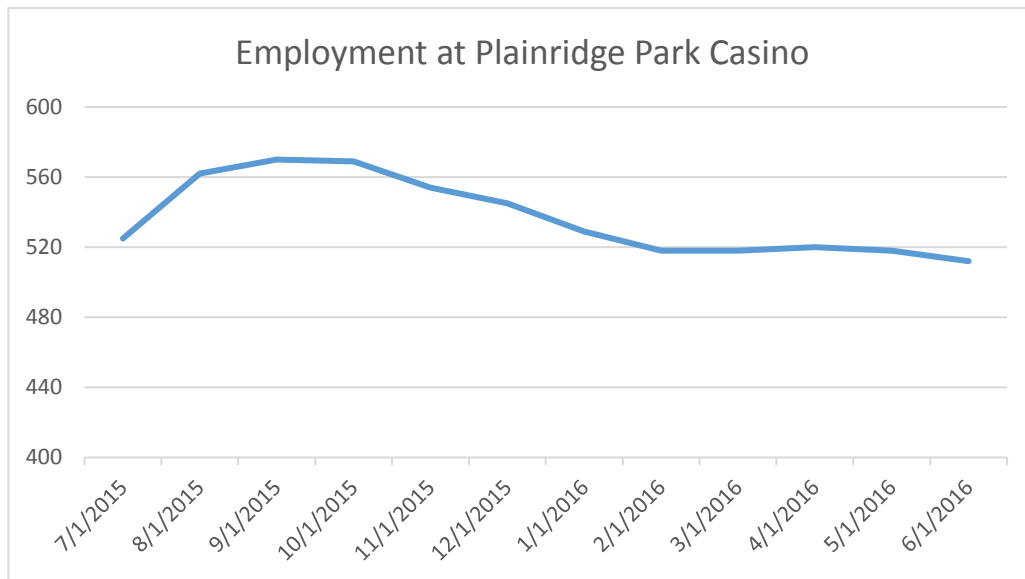
It should be noted that counts of hires, hours worked, and wages paid to employees from outside of Massachusetts are likely somewhat overstated, and as a result, the numbers for the regions of Massachusetts are likely somewhat understated. The reason is that the employment and payroll data

¹³ According to the Bureau of Labor Statistics, the average employee in the casinos, except casino hotels industry worked 34.4 hours per week. The number used in UMDI’s economic modeling exercise was calculated by dividing the 994,949 hours worked at PPC by 34.4 hours *52 weeks = 1,788.8 hours per year for a headcount of 556.2 annual employees.

used for this analysis relies upon employee self-reporting of home address. In the course of analyzing the data, UMDI found several employees whose home addresses were in states as far away as Florida or Nevada. While some of these workers may be seasonal workers (especially in the horse racing portion of the facility) with primary residences in other states, it is also likely that some employees hired from outside of Massachusetts simply forgot to update their addresses. While it is very unlikely that they still live so far away, UMDI determined that it cannot be assumed that they necessarily moved to Massachusetts, as a large number of employees do live in Rhode Island. Therefore, in the interest of a conservative estimate, these employees are assumed to live out-of-state for modeling purposes. When examining the total hours worked and the total wages paid together, it appears that there may be a regional difference in the number of higher-paying jobs. The average hourly wage for a worker in the Metro Boston region was \$20.04/hour compared to \$19.29/hour for out-of-state workers and \$15.53/hour for workers from the Southeast region.

Figure 5 shows the count of people employed at PPC in each month of its first fiscal year of operation. PPC started the year with 525 employees, a number which rose to 569 by October 2015 and gradually declined to 518 employees by February 2016. Employment remained roughly level for the remainder of the fiscal year 2016. PPC finished the fiscal year with 512 employees.

Figure 5: Monthly Employment at Plainridge Park Casino, FY2016



Source: Plainridge Park Casino

As shown in Table 7, most of the employees hired at PPC worked in a customer-serving capacity, with the two largest organizational groups being food and beverage and casino operation. While food and beverage is the larger of the two groups in terms of hires, casino operations represents a greater share of both hours worked and wages paid. While the next largest group, finance and administration, is much smaller than either food and beverage or casino operation, it represents a disproportionate share of wages paid relative to its size.

Table 7: Plainridge Park Casino Hires, Hours Worked, and Wages Paid by Organizational Group

Organizational Group	Hires	Hours Worked	Wages Paid
Finance and Administration	110	170,164	\$3,176,515
Sales and Marketing	27	43,402	\$1,240,676
Food and Beverage	359	294,354	\$4,536,710
Racing	71	61,918	\$1,084,178
Casino Operation	283	346,426	\$5,547,666
General and Administrative	5	7,296	\$792,834
Support Operations	31	58,225	\$1,080,251
Human Resources	7	13,164	\$349,868
Total	893	994,949	\$17,808,697

Source: Plainridge Park Casino

Table 8 highlights some of the differences between part-time and full-time workers at PPC. Of all the employees hired at PPC in its first year of operation, 573 of its 893 hires (64.2%) were full-time employees. Perhaps unsurprisingly, these employees worked longer hours than their part-time counterparts, making up 813,020 of the 994,949 hours worked (81.7%) that year. In what is likely the result of full-time positions having higher base pay, full-time employees made up an even more disproportionate share of wages paid, at \$15,361,540 of \$17,808,697 (86.3%).

Table 8: Plainridge Park Casino Hires, Hours Worked, and Wages Paid by Full-Time/Part-Time Status

Full-Time/Part-Time Status	Hires	Hours Worked	Wages Paid
Part-Time	320	181,928	\$2,447,157
Full-Time	573	813,020	\$15,361,540
Total	893	994,949	\$17,808,697

Source: Plainridge Park Casino

Table 9 and Figure 6 detail the geographic distribution of employees hired by PPC in its first fiscal year of operation. The top 10 cities and towns by number of hires account for the narrow majority (52.5%) of all of PPC's hires. Five of the top 10 zip codes of residence, including the top two (Attleboro and North Attleborough) are in the Northern part of Bristol County, MA, in the Southeast REMI region. Another three, including Plainville, are in the Western part of Norfolk County, MA, in the Metro Boston REMI region. The remaining two, Pawtucket and Providence, are cities across the state border in Rhode Island.

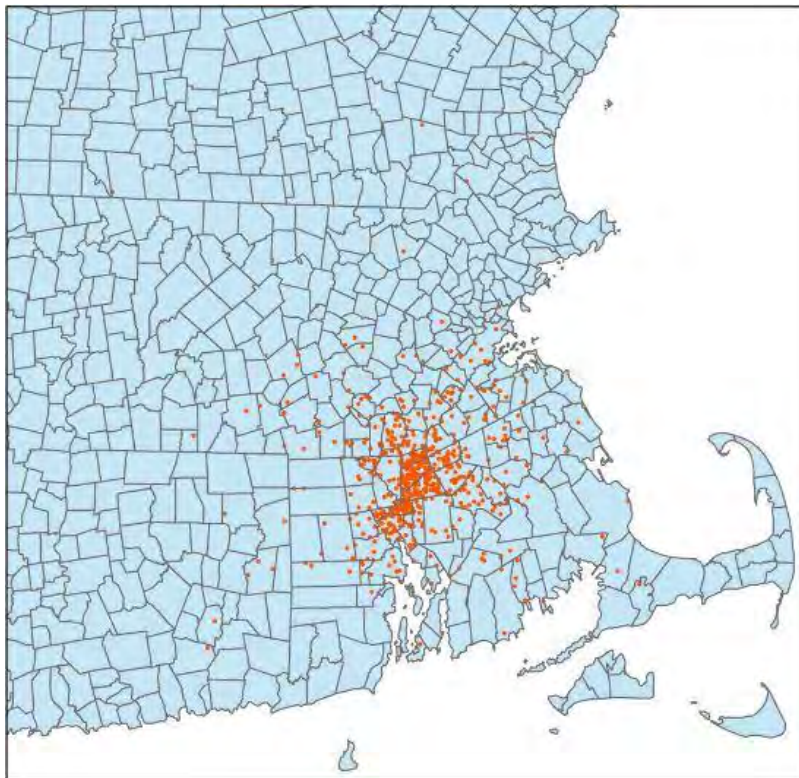
Table 9: Hires by Place of Residence

City/Town	REMI Region	Hires	Share of Hires
Attleboro, MA	Southeast	88	9.9%
North Attleborough, MA	Southeast	86	9.6%
Plainville, MA	Metro Boston	53	5.9%
Pawtucket, RI	Rest of Nation / World	53	5.9%
Providence, RI	Rest of Nation / World	39	4.4%
Mansfield, MA	Southeast	35	3.9%
Norton, MA	Southeast	30	3.4%
Taunton, MA	Southeast	29	3.2%
Franklin, MA	Metro Boston	28	3.1%
Wrentham, MA	Metro Boston	28	3.1%
All Other Places		424	47.5%
Total		893	100.0%

Source: Plainridge Park Casino

Most of the individuals hired to work at PPC are clustered relatively close to the casino itself. Some hires, however, are distributed as far away as Eastern Connecticut, Southern New Hampshire, Cape Cod, and the suburbs of southern Worcester County. Despite being by far the largest population center in the Commonwealth, only a few of PPC's employees listed Boston or its immediate suburbs as their place of residence.

Figure 6: Map of Plainridge Park Casino Hires, FY2016



Source: Plainridge Park Casino

Vendor Spending and Taxes

In addition to wages paid to employees, Plainridge Park Casino made millions of dollars in payments to various third parties in its first year of operation. These payments include purchases of goods from vendors, such as food and alcohol, payments to utility companies and third party service providers, taxes and other payments made to various government entities,¹⁴ and payments made on behalf of employees to various unions and membership organizations. Taken together, these payments amount to \$30.3 million in PPC's first year of operation, almost twice the amount paid in wages to employees. Table 10 gives a detailed breakdown of this spending.

Payments to private sector vendors account for \$18.6 million of that spending, which is 61.3% of all third party payments made by PPC. Payments to government entities (\$11.2 million or 36.9%) account for nearly all of the remaining spending. The remaining 1.7% of PPC's third party spending in its first year of operation can be attributed to payments to unions or membership organizations, payments to charitable organizations, or miscellaneous payments to individuals.

Of the payments made to government entities, the Commonwealth of Massachusetts is the largest beneficiary, with various local governments within Massachusetts accounting for the second largest share of spending. While PPC paid over \$900,000 in federal taxes in its first year of operation, that sum is nowhere near the \$4.4 million paid to Massachusetts local government or the \$5.9 million paid to the Commonwealth. The remaining spending, only \$23,245, is primarily payments made on behalf of employees to the governments of other states.

Table 10: Payments Made by Plainridge Park Casino, FY2016

Type of Payment	Amount	Share
Payments to Private Sector Vendors	\$18,606,043	61.3%
Payments to Government Entities	\$11,203,767	36.9%
<i>Federal Government Entities</i>	\$921,451	3.0%
<i>Massachusetts State Government Entities</i>	\$5,888,037	19.4%
<i>Other State Government Entities</i>	\$23,245	0.1%
<i>Local Government Entities</i>	\$4,371,035	14.4%
Payments to Unions and Other Membership Organizations	\$400,644	1.3%
Payments to Charitable Organizations	\$74,910	0.2%
Payments to Individuals	\$58,927	0.2%
Total	\$30,344,292	100.0%

Source: Plainridge Park Casino

Table 11 shows the top 10 private non-farm industry sectors to receive payments from PPC. The largest single industry in terms of spending by PPC was wholesale trade. This is somewhat intuitive since a firm as large as PPC would purchase almost all of its food, alcohol, cleaning supplies, uniforms, printed materials, etc. from wholesalers. The second largest industry, represented in REMI as miscellaneous manufacturing, is primarily payments to the manufacturers of slot machines and other gaming equipment. Many of PPC's expenditures in its first year of operation were on things that would be

¹⁴ The spending data included in this chapter does not include taxes on PPC's gross gaming revenue, which are collected daily and automatically and distributed according to a formula described in the next chapter. It does include all payments to the federal government, all payments to local governments, and all other payments to the Commonwealth of Massachusetts and other state government entities.

required of any business (such as utilities, professional, scientific, and technical services, and administrative and support services) while other industries, such as “performing arts and spectator sports” and “motion picture and sound recording industries”, more clearly differentiate PPC as a casino.

Table 11: Top 10 Industries by Vendor Spending

Industry	Amount	Share
Wholesale trade	\$5,622,313	18.5%
Miscellaneous manufacturing	\$2,950,975	9.7%
Utilities	\$2,125,119	7.0%
Professional, scientific, and technical services	\$1,795,481	5.9%
Retail trade	\$765,392	2.5%
Performing arts and spectator sports	\$634,976	2.1%
Administrative and support services	\$616,625	2.0%
Membership associations and organizations	\$480,069	1.6%
Broadcasting, except Internet	\$473,781	1.6%
Motion picture and sound recording industries	\$406,972	1.3%
All Other Industries	\$14,472,590	47.7%
Total	\$30,344,292	100.0%

Source: Plainridge Park Casino

As shown in Table 12, the Metro Boston region of Massachusetts was the largest beneficiary of PPC’s spending in its first fiscal year of operation, although that is in part a result of large payments made to state government entities located in Boston, as well as payments to the town of Plainville, which is located on the periphery of the region. Excluding payments to government entities, PPC spent more on goods and services from outside of Massachusetts than inside Massachusetts.

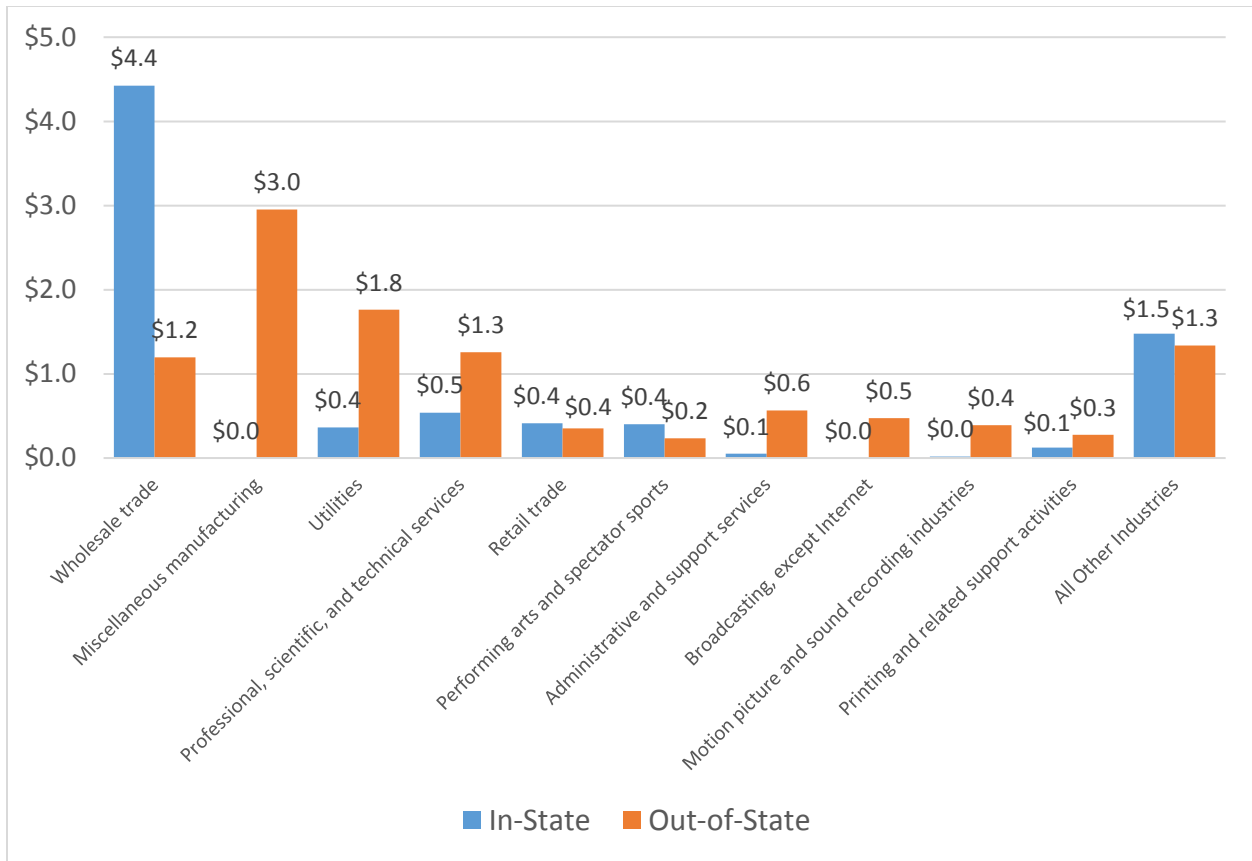
Table 12: Plainridge Park Casino Vendor Spending by Region

Region	Amount	Share
Metro Boston	\$14,187,421	46.8%
Southeast	\$4,482,510	14.8%
Central	\$298,855	1.0%
Pioneer Valley	\$124,808	0.4%
Cape and Islands	\$80,822	0.3%
Rest of Nation / World	\$11,169,878	36.8%
Total	\$30,344,292	100.0%

Source: Plainridge Park Casino

Figure 7 shows PPC’s vendor spending by industry for in-state and out-of-state vendors. The single largest recipient of spending from PPC was wholesale trade sector, with most of that spending occurring in Massachusetts. The second largest category, miscellaneous manufacturing, includes the manufacturers of slot machines. In the United States, most of these manufacturers are based around Las Vegas, so it is unsurprising that all of these funds were spent on out-of-state vendors. All told, PPC spent \$18.6 million on private sector vendors, with \$7.8 million of that going to vendors in Massachusetts.

Figure 7: In-State and Out-of-State Spending by Plainridge Park Casino by Industry

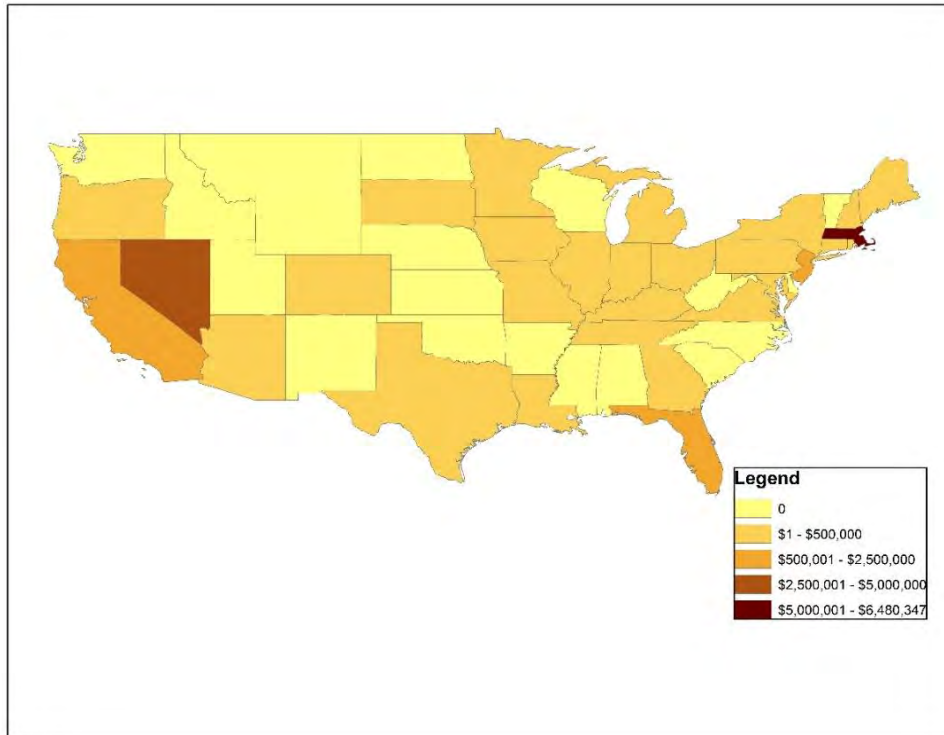


Source: Plainridge Park Casino

Figure 8 shows private non-farm vendor spending by state. While PPC spent more on private sector goods and services from outside of Massachusetts than inside, Massachusetts is still the single largest state in terms of private vendor spending. The next is Nevada, from which PPC purchased most of its gaming equipment. PPC purchased goods or services from private sector vendors in 29 out of 50 US states. Its business with vendors from outside the US was limited to a few purchases from a vendor in Canada.

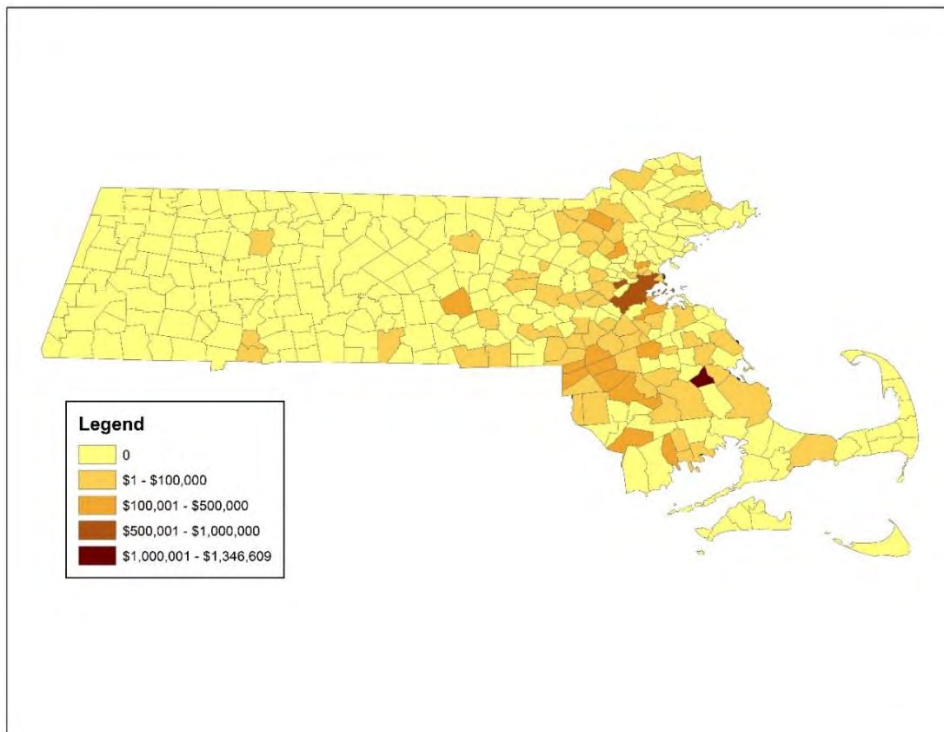
Figure 9 shows private non-farm vendor spending by city or town within Massachusetts. Private sector vendor spending within Massachusetts in PPC’s first year was largely clustered in the eastern part of the state. Boston, Plainville, and Plainville’s surrounding communities all feature prominently as places where PPC spent money on private sector vendors. Plympton, in Plymouth County, however, received the most vendor spending from PPC. Plympton, the only city or town in Massachusetts to receive over \$1 million in vendor spending from PPC, is the home of a major food distributor to PPC, as well as a veterinarian who cares for the horses at PPC’s harness racing track.

Figure 8: Map of Plainridge Park Casino Private Vendor Spending by State



Source: Plainridge Park Casino

Figure 9: Map of Plainridge Park Casino Private Vendor Spending within Massachusetts by City/Town

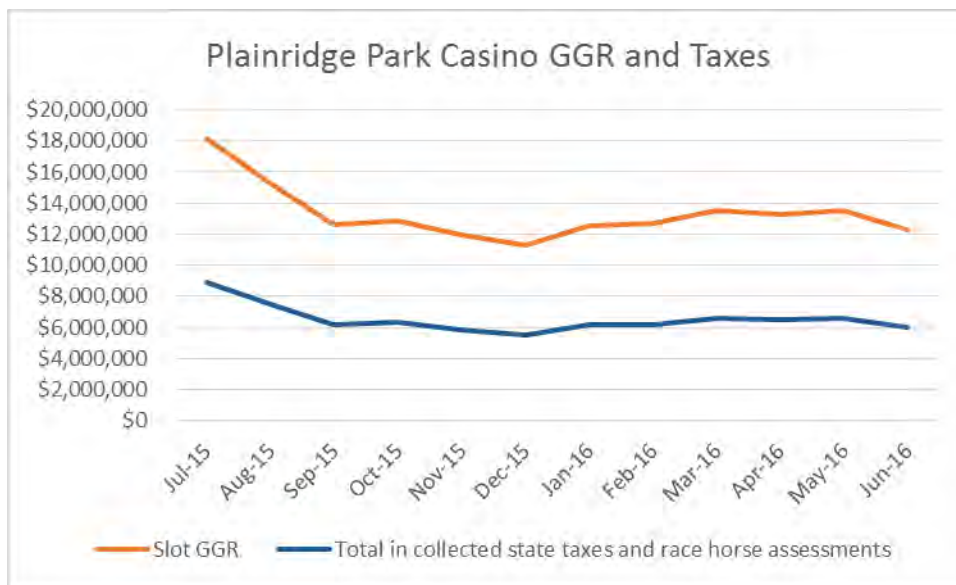


Source: Plainridge Park Casino

Public Sector Impacts from Gross Gaming Revenue

In addition to the regular business taxes paid by PPC, the Expanded Gaming Act also collects 49% of PPC’s gross gaming revenue (GGR) in gaming taxes and horse racing assessments. Since the data surrounding the collection and disbursement of this revenue is relatively rich, it is presented separately from the rest of PPC’s taxes. PPC paid far more in GGR taxes than any other tax in its first 12 months of operation, amounting to just over \$81 million on \$166 million in gross gaming revenue generated by their slot machines. As shown in Figure 10, after an initial spike in revenue in the first month of operation, slot GGR remained fairly level for the remainder of the year, rising and falling between just over \$11 million to just under \$13.5 million. This meant that revenue to the Commonwealth remained roughly level as well.¹⁵

Figure 10: Plainridge Park Casino Monthly Gross Gaming Revenue, FY 2016

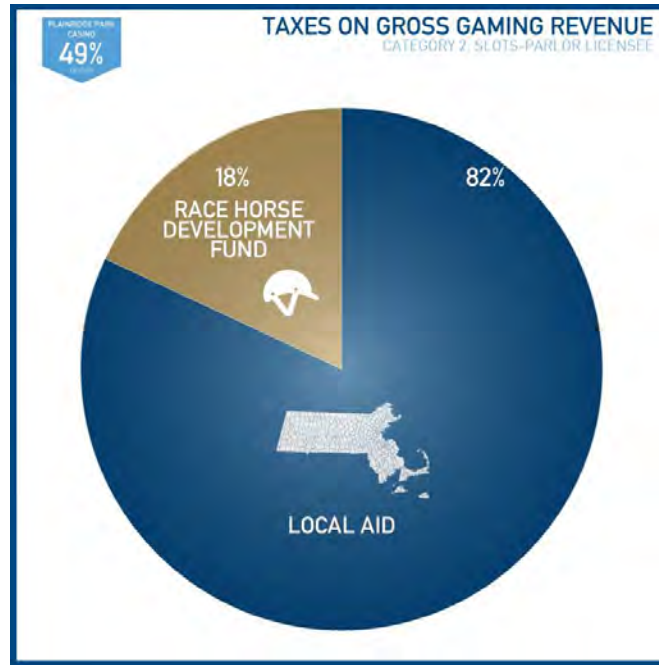


Source: Massachusetts Gaming Commission

Taxes on PPC’s gross gaming revenue are allocated according to a formula set in place by the Expanded Gaming Act. This is unlike most of the taxes paid by PPC, which are not earmarked for a specific purpose by the local, state, or federal government entities collecting them. Of the \$81.4 million collected in PPC’s first fiscal year of operation, 18% (\$14.9 million) was collected by a race horse assessment and sent to the Massachusetts’ Race Horse Development Fund, while the remaining 82% (\$66.4 million) was collected in taxes that were then used to increase local aid to Massachusetts cities and towns.

¹⁵ In addition to these payments, PPC, as well as the other license awardees, paid licensing fees which were distributed according to a different formula. Since this report seeks to study the impacts of PPC in its first year of operation, these payments are not modeled, but they may be addressed in a future report.

Figure 11: Disbursement of Taxes on Plainridge Park Casino's Gross Gaming Revenue



Source: Massachusetts Gaming Commission

Massachusetts Race Horse Development Fund

Of all taxes on GGR collected from PCC, 18% (which is equivalent to roughly 9% of PPC's total GGR), is allocated to the Massachusetts Race Horse Development Fund. Money in the fund is further divided among three main programs. The majority (80%) of funds is kept for purses in an interest-bearing account, with the only stipulation being that those funds are mixed with funds from the track itself to form the total purse for a given racetrack. Of the remaining funds, 16% is used for horse breeding programs, while 4% is put towards health and pensions for racing industry workers. Unfortunately, at this time, there is no tracking system in place which would allow UMDI to adequately capture the exact economic impact of the activities supported by the fund. For example, UMDI was unable to locate data on when and where payments from the fund's purses were made, what share of the winning horse owners were Massachusetts residents, what share of the horses running in races for that purse were stabled in Massachusetts, or how much was being spent to stable and train race horses within Massachusetts. Without these data, UMDI did not have enough information to build the set of inputs for the PI+ model, which led to the decision to table this aspect of the analysis until these data become available.

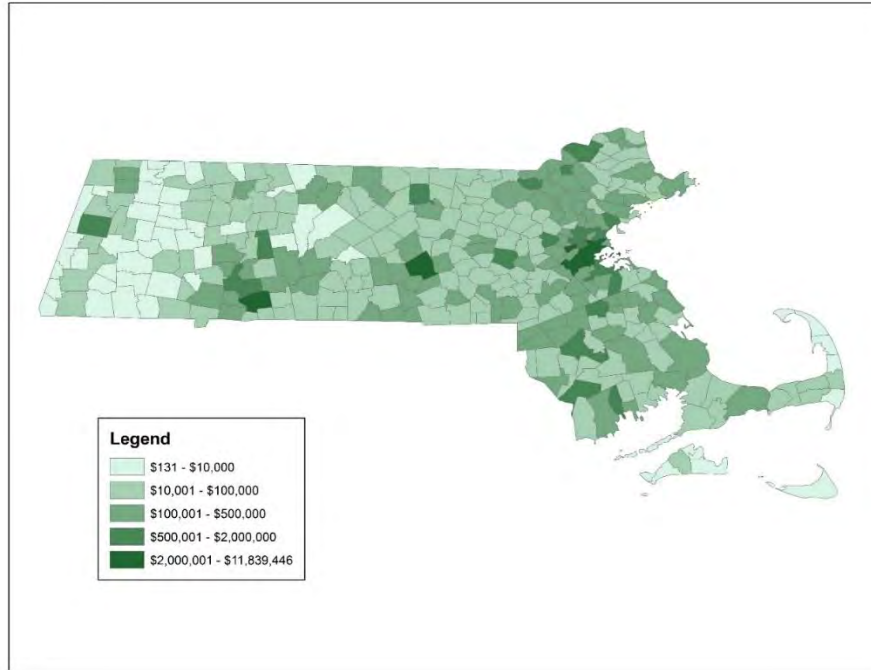
Local Aid

The Commonwealth has an existing mechanism for making direct payments to cities and towns using the state's General Fund and proceeds from the state lottery. By statute, 82% of the taxes on PPC's gross gaming revenue is allocated to local aid and thus added to these existing sources of funding. This newly enlarged pot of money is then allocated using the same distribution formula which had previously been used, resulting in each city and town continuing to receive its expected share of now-greater local aid funds.¹⁶ The formula currently set by the Massachusetts legislature distributes local aid funds based

¹⁶ For more information on local aid distribution, see <http://www.mass.gov/bb/h1/fy16h1/os_16/h3only.htm>

on a city or town’s population, income, and property values. Indeed, large and economically distressed communities received the largest share of new local aid funds from PPC. Figure 12 and Table 13 show how local aid funds were distributed across Massachusetts.

Figure 12: New Local Aid Money from Plainridge Park Casino Gross Gaming Revenue by City/Town



Source: Massachusetts State Legislature, UMDI calculations

When aggregated into the regions that were used for our PI+ model, it becomes clear that the majority of local aid funds are distributed to the Metro Boston region. This is unsurprising given the sheer size and population density of the region, along with the fact that many of the Commonwealth’s more economically distressed cities and towns are within this region. As mentioned previously, public sector spending was the reason for a net positive economic impact in most regions of Massachusetts. This local aid spending is by far the largest source of that spending.

Table 13: Distribution of Local Aid from Gross Gaming Revenue by REMI Region

Region	New Local Aid (Millions of Dollars)
Metro Boston	\$39.7
Southeast	\$9.3
Central	\$7.7
Pioneer Valley	\$7.7
Cape and Islands	\$0.6
Berkshires	\$1.4
Total	\$66.4

Source: Massachusetts State Legislature

Changes in Consumer Spending: Patrons and Their Spending Patterns

Like any gambling establishment, Plainridge Park Casino makes its revenue by attracting consumers to spend their money there. But that money does not come from nowhere. Just like with any major attraction, the people visiting PPC are spending money that otherwise would have been spent elsewhere. While the collection of data on employment, wages, vendor spending, and revenue was fairly straightforward, it only describes part of PPC's economic impact. In order to fully capture the impact of PPC's opening, we also had to estimate the amounts of spending diverted from other Massachusetts businesses. The following sections describes our process for forming those estimates.

One of the greatest challenges facing researchers conducting economic impact studies is conceiving of a counterfactual¹⁷ for consumer behavior. To determine how changes in patron behavior affect the economy, it is critical to understand what patrons would be doing if Massachusetts had not expanded in-state gaming. To do this, SEIGMA's patron survey asked four questions which help establish what the patrons' spending patterns would look like in a world without Plainridge Park Casino.¹⁸ Those questions are: Question 1, which establishes the patron's home zip code (and whether or not they live in Massachusetts); Question 5, which targets patrons living out-of-state and Question 6, for in-state patrons, which together establish whether or not Plainridge Park Casino prompted the patron's visit to Massachusetts or Plainville; and Question 20, which asks the patron whether they would have spent the money that they spent at Plainridge Park Casino on gambling in another state if Plainridge Park Casino did not exist. Based on the patrons' answers, they are categorized into one of six patron types created by UMDI and modeled slightly differently in the economic model. Descriptions of the six patron types and how they were treated in the model are given below.

Patron Type Definitions

The six patron types are defined by a combination of attributes. A **captured** or **recaptured** patron is someone who indicated that, had Massachusetts never expanded in-state gaming, they would have spent the money that they spent at PPC at an out-of-state casino. A **reallocated** patron is someone who indicated that, had PPC never opened, they would have spent the money they spent at PPC on other goods and services within Massachusetts. A **new** patron is an out-of-state patron who would not have visited Massachusetts were it not for PPC. An **incidental** patron is someone whose visit to Plainville (if from Massachusetts) or to Massachusetts (if from out-of-state), was not prompted by PPC.

Recaptured in-state patrons are people who live in Massachusetts but who would have gambled out-of-state if not for the in-state option. For modeling purposes, UMDI treats all spending reported by recaptured in-state patrons as new to the state. This includes their off-site spending, as UMDI assumes that, if PPC did not exist, recaptured in-state patrons would be spending money on similar off-site expenditures in another state. Technically speaking, the on-site spending of recaptured in-state patrons is not used as an input in the model because the casino's revenues, which go to hire and pay employees,

¹⁷ In the parlance of economic modeling, a counterfactual is a statement of what would be different if something which is currently true were not true. So in this case, finding a counterfactual for consumer behavior would mean finding an estimate for how Plainridge Park Casino patrons would have spent their money if PPC had never opened.

¹⁸ For detailed information on the patron survey, including a copy of the survey instrument, see SEIGMA's forthcoming *Patron and License Plate Report: Plainridge Park Casino 2016*.

purchase intermediate goods and services, and pay state and local governments, are already captured in greater detail elsewhere in the modeling process.

Reallocated in-state patrons are people from Massachusetts who would not have visited Plainville were it not for the casino, but who also would not have gambled out-of-state. In other words, these are patrons who, were it not for the casino, would have likely spent their money on goods and services other than gambling. Therefore, the decision to visit PPC implies a movement (or reallocation) of spending from an activity in one region to a different activity in another. For simplicity, this is represented in the model as a decrease in consumption of a general basket of goods and services in the region where the patron lives, equal to the on-site and off-site expenditures of the patron. It is offset by an increase in off-site spending in the region that hosts the casino. On-site spending is already captured in the modeling of casino revenues.

Reallocated in-state incidental patrons are like reallocated in-state casino visitors, except that they indicated that PPC did not prompt their visit to Plainville. For example, they may live in Plainville itself, or they may have been running errands or visiting family in Plainville. In any case, they would have been in the area regardless of the presence of a casino. The primary way that this affects the economic modeling is that UMDI cannot assume that their spending outside of the casino would not have occurred if not for the existence of PPC. Therefore, it is neither added to the model as new spending nor reallocated from another region.

New out-of-state patrons are visitors from other states who would not have visited Massachusetts were it not for PPC. While these residents live outside of Massachusetts, for modeling purposes, they are exactly the same as recaptured in-state patrons, as their expenditures during that visit would not have occurred within the Commonwealth if not for PPC.

Captured out-of-state incidental patrons are people who would have visited Massachusetts regardless of whether or not PPC existed, but who chose to gamble here rather than in their home state now that it does exist. These are patrons who live out-of-state, who reported that PPC did not prompt their visit to Massachusetts, but also reported they would have spent the money that they spent at PPC on gambling at an out-of-state casino if PPC did not exist. Similar to reallocated in-state incidental patrons, these patrons are drawn to Plainville by a purpose unrelated to the existence of the casino but their stay would probably have been shorter and less expensive were it not for PPC. These patrons do not have any effect on the economic model because their spending at PPC is already captured through employment, payroll, vendor spending, and fiscal data. Any spending these patrons do off-site is also assumed to be part of the regular course of their visit to Massachusetts, which would have occurred without the casino.

Reallocated out-of-state incidental patrons are patrons whose visit to Massachusetts was not prompted by PPC, and who would not have otherwise spent the money they spent at PPC on gambling out-of-state. In other words, they are out-of-state visitors who would have come to Massachusetts without the casino and instead chose to spend their time and money at PPC rather than elsewhere in Massachusetts. Our economic model treats these patrons in a similar way to the reallocated in-state casino visitors. The one exception is that instead of having their spending reallocated from a regional consumption basket to casino revenues, it is reallocated from a basket of goods and services frequently consumed by out-of-state tourists in Massachusetts.

Table 14: Patron Type Definitions

Patron Type	Q1 Origin	Q20 Would have gambled elsewhere	Q5 Casino prompted visit (from MA)	Q6 Casino prompted visit (not from MA)	On Site Spending	Off Site Spending
Recaptured In-State	In-State	Yes	N/A	N/A	Not Modeled	Modeled, New
Reallocated In-State	In-State	No	Yes	N/A	Modeled, Reallocated	Modeled, Reallocated
Reallocated In-State Incidental	In-State	No	No	N/A	Modeled, Reallocated	Not Modeled
New Out-of-State	Out-of-State	N/A	N/A	Yes	Not Modeled	Modeled, New
Captured Out-of-State Incidental	Out-of-State	Yes	N/A	No	Not Modeled	Not Modeled
Reallocated Out-of-State Incidental	Out-of-State	No	N/A	No	Modeled, Reallocated	Modeled, Reallocated

Shares of Patron Spending

Using these definitions, patron spending assumptions can now be made and used in our economic impact model. Shares of patron spending by type are calculated and are applied to known spending at the casinos to come up with spending estimates for the model in several categories. For the purposes of this analysis, UMDI used PPC’s gross gaming revenue as reported by the MGC to capture the total amount of patron gambling spending at PPC. To estimate non-gaming revenue, UMDI used reported non-gaming revenue for 2016, which was reported by PPC’s parent company – Penn National Gaming – in their annual report.¹⁹ Off-site patron spending was estimated by taking a ratio of reported off-site non-gambling spending to reported on-site spending and applying it to the figure for on-site non-gambling spending.

As can be seen in Table 15, for every dollar that PPC patrons spent on non-gambling activities during their visit, either at the casino or off-site, they spent over \$16 on gambling at the casino. UMDI estimates that less than half of non-gambling spending by casino patrons occurred off-site.

¹⁹ While Penn National’s figure was for calendar year 2016 rather than PPC’s first fiscal year of operation, UMDI’s contacts at PPC stated that the figure is an acceptable proxy.

Table 15: Patron Spending by Spending Type

Spending Type	Amount
On-Site Gaming Revenue	\$166,046,937
On-Site Non-Gaming Revenue	\$6,500,000
Estimated Off-Site Patron Spending	\$4,046,878

Source: Massachusetts Gaming Commission, Penn National Gaming, SEIGMA

With the total amounts of spending on and off-site established, the next task was to establish shares of spending by patron type and geographical origin. The team which was sent to administer the survey at Plainridge Park Casino over the winter of 2015 and the summer of 2016 returned a sample of 421 respondents whose surveys were complete enough for our use. While this sample is more comprehensive than most similar surveys, it is not large enough to avoid issues of small sample sizes and high margins of error in some of our estimates. This is particularly true when the patron groups were tabulated by region of origin. Because the REMI model estimates the amount of new economic activity occurring in each region, we used the estimated shares provided by the survey for our modeling exercise. However, the high margins of error mean that some activity ascribed to one region may have actually occurred in a different region. The decision to only report REMI outputs related to changes in consumer spending at the state level was made in response to this issue. The remainder of this section will show a few of the more high-level tables created with patron survey data. The remaining patron survey data used to inform the model are presented without analysis in Appendix 4. However, UMDI does not endorse the use of these data for any purpose other than better understanding the REMI modeling process.

Patron Spending at Plainridge Park Casino

As shown in Table 16, the majority of respondents who indicated that they had gambled at PPC were identified as recaptured in-state patrons, with the next most prominent patron type being reallocated in-state patrons. Taken together with new out-of-state patrons, this leads to an estimate that \$121.4 million, or 73.1% of gambling spending was new spending to Massachusetts. This value should be treated with some caution, due to the high margin of error in the estimates for new out-of-state patrons. The remaining spending would likely have been spent on some other type of activity within Massachusetts. The three patron types designated as “incidental”, which are patrons who indicated that they would have been in the area regardless of whether or not PPC had opened, represent a smaller share of gambling spending compared with their share of all respondents. This suggests that the incidental patron groups are more casual gamblers than other patron types, who all represent a greater share of gambling spending than their share of respondents would suggest.

Table 16: Share of On-Site Gambling Spending by Patron Type

Patron Type	Share of Respondents	Spending	Share of Spending
Recaptured In-State	54.5%	\$96,726,780	58.3%
Reallocated In-State	16.9%	\$27,141,634	16.3%
Reallocated In-State Incidental	7.4%	\$6,718,167	4.0%
New Out-of-State*	9.7%*	\$24,680,357*	14.9%*
Captured Out-of-state Incidental	10.1%	\$9,625,773	5.8%
Reallocated Out-of-State Incidental**	1.6%**	\$1,154,226**	0.7%**
Total	100.0%	\$166,046,937	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

As with gambling spending, the majority of respondents who indicated that they had spent money on non-gambling amenities at PPC identified as recaptured in-state patrons. Reallocated in-state patrons were again the second most prominent patron group here. There is a large discrepancy between the share of patrons and share of spending for this group (16.9% versus 37.6%). The high margin of error associated with the spending estimate, however, makes it difficult to assess the significance of this finding. Reallocated in-state incidental patrons are largely the inverse of reallocated in-state patrons, with their share of non-gambling spending (4.1%) less than half their share of respondents (9.3%). Since these patrons indicated that they would have visited Plainville regardless of whether or not PPC was there, it is possible that these patrons were more likely to prefer non-gambling attractions outside of the casino that out-of-town or out-of-state patrons may not have been aware of. Table 17 shows the breakdown of on-site non-gambling spending.

Table 17: Share of On-Site Non-Gambling Spending by Patron Type

Patron Type	Share of Respondents	Spending	Share of Spending
Recaptured In-State	56.2%	\$3,275,716	50.4%
Reallocated In-State	16.9%	\$2,446,034	37.6%*
Reallocated In-State Incidental	9.3%	\$265,638	4.1%
New Out-of-State*	7.0%*	\$182,147*	2.8%*
Captured Out-of-state Incidental	9.8%	\$293,120	4.5%*
Reallocated Out-of-State Incidental**	0.8%**	\$37,345**	0.6%**
Total	100.0%	\$6,500,000	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Patron Spending Off-Site

The majority of patrons surveyed indicated that they did not spend money off-site during their trip to PPC. Among those patrons who did report some off-site spending, the most commonly reported expenditures were food or beverage or retail shopping. Very few survey respondents reported staying at a hotel or attending any sort of entertainment outside of PPC. While the patron survey did help inform UMDI as to what types of things patrons were spending money on, it did not give a sense of how much

was spent. To form those estimates, UMDI used data from the Massachusetts Office of Travel and Tourism (see Table 19).

Table 18: Off-Site Spending by Plainridge Park Casino Patrons by Non-Gambling Activity

Non-Gambling Activity Off-Site (Check All That Apply)	Respondents (Unweighted)	Weighted		
		Respondents	Share of Respondents	95% CI
Bought food or beverage in a restaurant or fast food outlet	106	387,170	21.4%	(17.4, 26.1)
Retail shopping like at store or mall	52	202,142	11.2%	(7.7, 16.0)
Stayed at a hotel outside of the casino	7	29,518	1.6%	(0.7, 3.7)
Went to a live entertainment show, concert or performance	10	38,232	2.1%	(1.1, 4.2)
Spent money on other entertainment (e.g. amusement park, bowling, museum)	14	57,488	3.2%	(1.8, 5.7)
Nothing	296	1,216,216	67.2%	(61.6, 72.3)

Source: SEIGMA Patron Survey

To estimate the economic impact of off-site spending from PPC patrons, UMDI spread out the estimated spending by industry. The basis for this was a set of spreadsheets provided to UMDI by the Massachusetts Office of Travel and Tourism (MOTT), showing the average consumption habits of different types of tourists in Massachusetts. Using day-tripping tourists as a rough proxy for casino patrons (nearly all lived within a day’s drive of PPC), UMDI then modified MOTT’s data to remove any consumption categories which were very underrepresented in the patron survey data (e.g., spending at hotels). The shares presented in Table 19 were then used to distribute new off-site spending (spending by patron groups other than reallocated in-state incidental and captured out-of-state incidental) to corresponding consumer spending categories within the PI+ model.

Table 19: Off-Site Spending by MOTT Spending Category and REMI Consumption Category

MOTT Spending Category	REMI Consumption Category	Share of New Spending
Transportation within State	Ground transportation	7.5%
Gasoline within State	Motor vehicle fuels, lubricants, and fluids	15.1%
Parking/Tolls within state	Other motor vehicle services	3.2%
Food/Beverage/Dining (excluding groceries)	Purchased meals and beverages	28.0%
Groceries	Food and nonalcoholic beverages purchased for off-premises consumption	6.5%
Entertainment (excluding gaming)/Admissions	Membership clubs, sports centers, parks, theaters, and museums	10.8%
Shopping/Gifts/Souvenirs	Recreational items	17.2%

MOTT Spending Category	REMI Consumption Category	Share of New Spending
Amenities (golf fees, spa, health club, ski passes, etc.)	Membership clubs, sports centers, parks, theaters, and museums	1.1%
Other	All Consumption Categories	10.8%
Total		100.0%

Source: Massachusetts Office of Travel and Tourism, UMDI modifications

A similar method was used to estimate which types of spending might not be occurring across the state due to the shifts in spending from reallocated out-of-state incidental patrons. In this case, UMDI used MOTT data for tourists who did stay more than one day as a proxy for these patrons, whose visit to Massachusetts was not prompted by PPC and who would not have spent their money gambling out-of-state if PPC had not opened. This reallocated spending was then spread around the state based on the regional share of consumption for each of these goods or services.

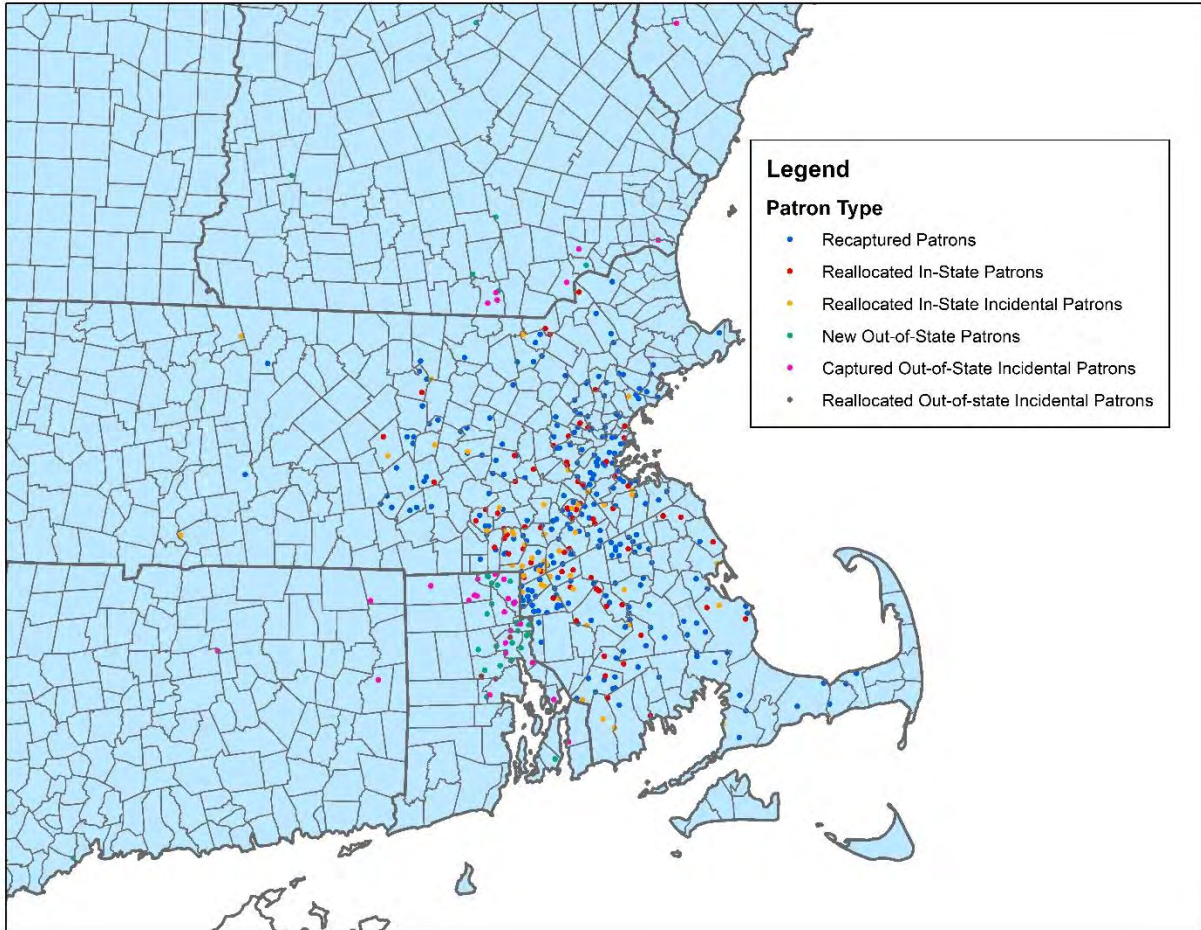
Table 20: Spending by Reallocated Out-of-State Incidental Patrons, by Previous REMI Consumption Category

MOTT Spending Category	REMI Consumption Category	Share of Reallocated Spending
Transportation within State	Ground transportation	5.2%
Gasoline within State	Motor vehicle fuels, lubricants, and fluids	5.2%
Parking/Tolls within state	Other motor vehicle services	1.9%
Lodging - Total including day trippers	Accommodations	38.9%
Food/Beverage/Dining (excluding groceries)	Purchased meals and beverages	24.6%
Groceries	Food and nonalcoholic beverages purchased for off-premises consumption	5.0%
Entertainment (excluding gaming)/Admissions	Membership clubs, sports centers, parks, theaters, and museums	8.2%
Shopping/Gifts/Souvenirs	Recreational items	7.6%
Amenities (golf fees, spa, health club, ski passes, etc.)	Membership clubs, sports centers, parks, theaters, and museums	1.5%
Other	All Consumption Categories	1.9%
Total		100.0%

Source: Massachusetts Office of Travel and Tourism, UMDI modifications

Figure 13 shows the approximate location of survey respondents, based on zip code. Patrons of the casino are heavily clustered in the cities and towns around Plainville, and along the Route 1 corridor, which runs through Plainville on its way from Boston to Providence, Rhode Island. Reallocated in-state incidental patrons seem to be clustered more closely to PPC than recaptured or reallocated in-state patrons. Almost all new out-of-state patrons and reallocated out-of-state incidental patrons lived in Northeastern Rhode Island. Almost all of the other out-of-state patrons were classified as captured out-of-state incidental patrons whose visit to Massachusetts was not prompted by PPC, but who would have otherwise spent their money gambling out-of-state at some point.

Figure 13: Map of Survey Respondents by Patron Type



Source: SEIGMA Patron Survey

Conclusion

The economic impact of Plainridge Park Casino's first year of operation went far beyond the 556 positions at the casino. Between the \$17.8 million in new wages being spent in the economy, \$19.1 million spent on vendors and organizations, and the \$77.6 million in new revenue collected by various government entities, the majority of the 2,758 jobs created or supported by the casino were not actually on site. These positive impacts must be somewhat tempered by the estimated 340 jobs lost due to reallocations in patron spending, leading to a net impact of 2,417 jobs. This number would have been much lower were it not for the substantial amount of new revenue collected by the state, which ultimately had a larger economic impact than all other new activity. It also could have been much lower if not for the majority of patron spending coming from patrons who would otherwise have spent their money out-of-state.

In measuring the economic impact of PPC, UMDI had an opportunity to produce a study informed not only by proprietary data from PPC but also by a customized survey of casino patrons. While the use of proprietary data and access to a business's patrons are not uncommon in economic impact studies, their use tends to be concentrated in studies funded by the organizations whose impact is being assessed. Because of the robust and forward-thinking regulatory environment in Massachusetts and the research agenda mandated by it, UMDI was able to model PPC's impact using a level of detailed data which otherwise would not have been granted to outside researchers. Cooperation from PPC and the Massachusetts Gaming Commission, as well as the exceptional work of UMDI's partners on the SEIGMA team, allowed for a rich set of model inputs that add credibility to these findings.

While the scope of this report is limited to a single year of operation for a single casino, the methodological decisions made in generating this report and presenting the associated data will inform subsequent studies. This offers a pathway to monitor the ongoing impacts of PPC and evaluate the impacts of the other casinos as they open. UMDI believes that the methodology used in this report can serve as a template for other studies of large and/or multi-year economic development projects, both within Massachusetts and elsewhere. We hope that this study and future studies utilizing its methodology will serve a key role in helping the MGC, the Legislature, and the residents of Massachusetts evaluate the degree to which the expansion of gaming in Massachusetts has met the expectations and objectives of the state.

While other organizations have performed economic impact studies of PPC prior to its opening, UMDI believes that comparing those studies to this one would be of limited value. The reasons for caution are multifaceted. Most prominently, our study was based on data from actual operations rather than predictions of future activity. Across studies, these data were then input into different economic models with only this one using REMI PI+. Lastly, our methodology takes into account factors such as government spending of new revenues and reallocation of consumer spending which are not considered at the same level of detail in other reports. Furthermore, the detailed methodology used in this study, and its reliance on detailed operational data from PPC, limits the ability to extend these findings to the potential impacts of other casinos, racinos, and slot parlors around the country or to compare it to previously completed studies of similar properties without first comparing their methodologies.

UMDI plans to continue to study PPC, as well as the other casinos as they come online. In future years, we hope to increase the sample size of the patron survey so we can more confidently report on shifts in

patron spending and its impacts at a regional level, increasing the usefulness of this information for policymakers and the general public.

Appendix 1: The PI+ Model

PI+ is a structural economic forecasting and policy analysis model. It integrates input-output, computable general equilibrium, econometric, and economic geography methodologies. The model is dynamic, with forecasts and simulations generated on an annual basis and behavioral responses to compensation, price, and other economic factors.

The model consists of thousands of simultaneous equations with a structure that is relatively straightforward. The exact number of equations used varies depending on the extent of industry, demographic, demand, and other detail in the specific model being used. The overall structure of the model can be summarized in five major blocks: (1) Output and Demand, (2) Labor and Capital Demand, (3) Population and Labor Supply, (4) Compensation, Prices, and Costs, and (5) Market Shares. The blocks and their key interactions are shown in Figure 14 and Figure 15.

Figure 14: REMI Model Linkages

REMI Model Linkages (Excluding Economic Geography Linkages)

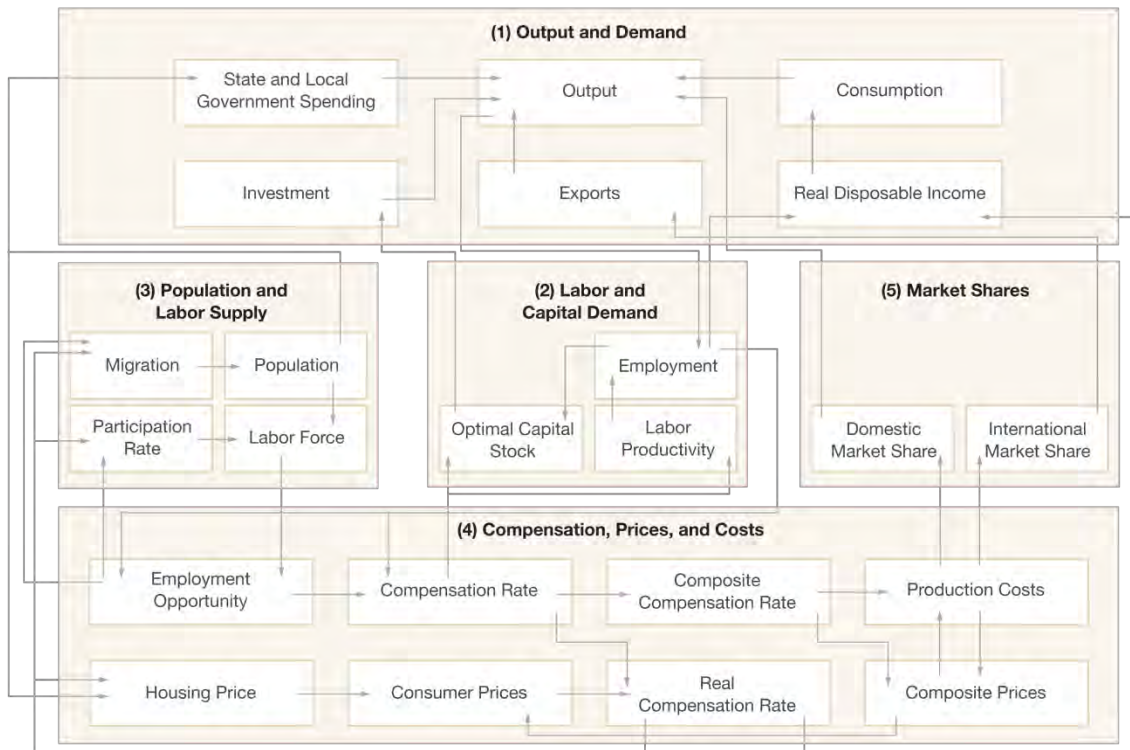
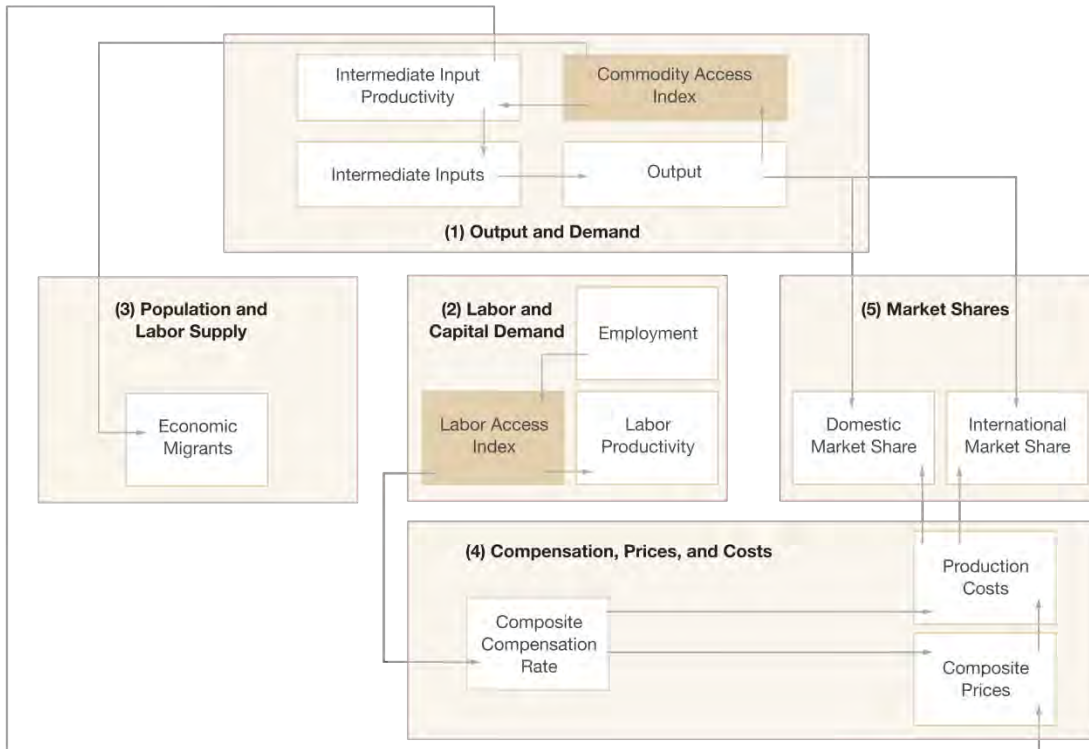


Figure 15: Economic Geography Linkages



The Output and Demand block consists of output, demand, consumption, investment, government spending, exports, and imports, as well as feedback from output change due to the change in the productivity of intermediate inputs. The Labor and Capital Demand block includes labor intensity and productivity as well as demand for labor and capital. Labor force participation rate and migration equations are in the Population and Labor Supply block. The Compensation, Prices, and Costs block includes composite prices, determinants of production costs, the consumption price deflator, housing prices, and the compensation equations. The proportion of local, inter-regional, and export markets captured by each region is included in the Market Shares block.

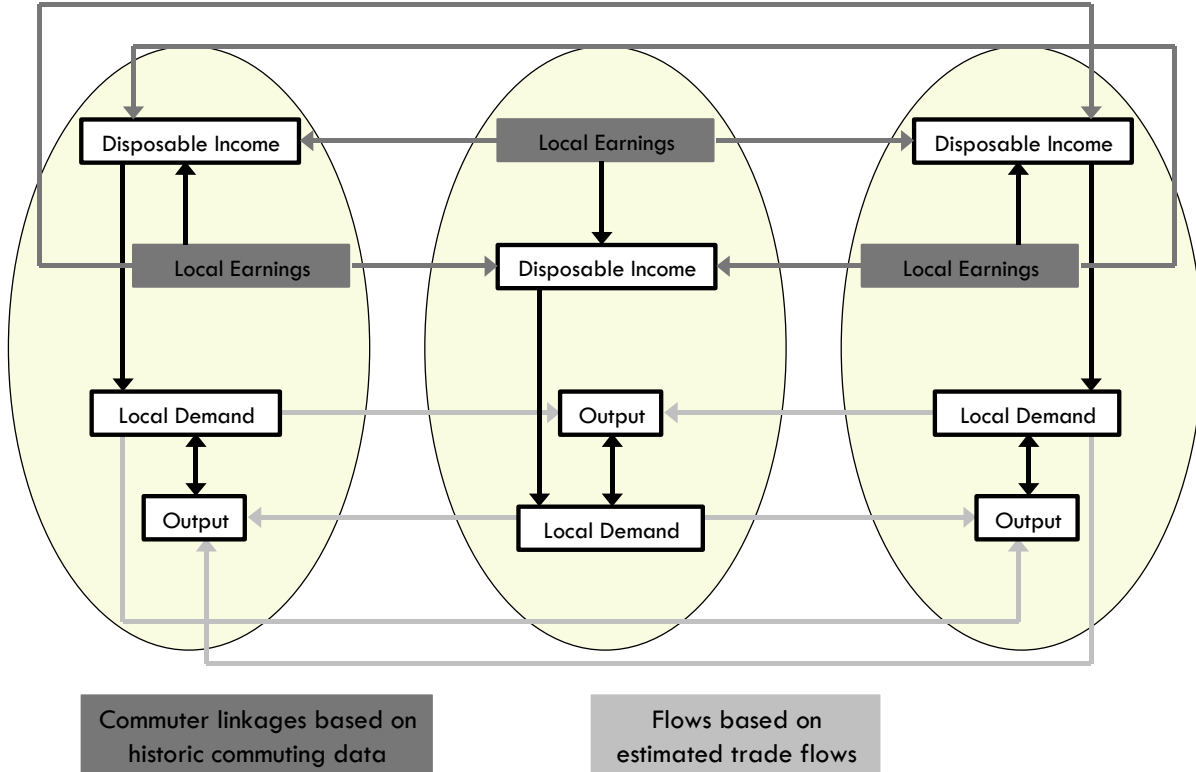
Models can be built as single region, multi-region, or multi-region national models. A region is defined broadly as a sub-national area, and could consist of a state, province, county, or city, or any combination of sub-national areas.

Single-region models consist of an individual region, called the home region. The rest of the nation is also represented in the model. However, since the home region is only a small part of the total nation, changes in the home region do not have an endogenous effect on the variables in the rest of the nation.

Multi-regional models have interactions among regions, such as trade and commuting flows. These interactions include trade flows from each region to each of the other regions. These flows are illustrated for a three-region model in Figure 16.

Figure 16: Trade and Commuter Flow Linkages

Trade and Commuter Flow Linkages



Multiregional national models also include a central bank monetary response that constrains labor markets. Models that only encompass a relatively small portion of a nation are not endogenously constrained by changes in exchange rates or monetary responses.

Block 1. Output and Demand

This block includes output, demand, consumption, investment, government spending, import, commodity access, and export concepts. Output for each industry in the home region is determined by industry demand in all regions in the nation, the home region's share of each market, and international exports from the region.

For each industry, demand is determined by the amount of output, consumption, investment, and capital demand on that industry. Consumption depends on real disposable income per capita, relative prices, differential income elasticities, and population. Input productivity depends on access to inputs because a larger choice set of inputs means it is more likely that the input with the specific characteristics required for the job will be found. In the capital stock adjustment process, investment occurs to fill the difference between optimal and actual capital stock for residential, non-residential, and equipment investment. Government spending changes are determined by changes in the population.

Block 2. Labor and Capital Demand

The Labor and Capital Demand block includes the determination of labor productivity, labor intensity, and the optimal capital stocks. Industry-specific labor productivity depends on the availability of workers with differentiated skills for the occupations used in each industry. The occupational labor supply and commuting costs determine firms' access to a specialized labor force.

Labor intensity is determined by the cost of labor relative to the other factor inputs, capital and fuel. Demand for capital is driven by the optimal capital stock equation for both non-residential capital and equipment. Optimal capital stock for each industry depends on the relative cost of labor and capital, and the employment weighted by capital use for each industry. Employment in private industries is determined by the value added and employment per unit of value added in each industry.

Block 3. Population and Labor Supply

The Population and Labor Supply block includes detailed demographic information about the region. Population data is given for age, gender, and race, with birth and survival rates for each group. The size and labor force participation rate of each group determines the labor supply. These participation rates respond to changes in employment relative to the potential labor force and to changes in the real after-tax compensation rate. Migration includes retirement, military, international, and economic migration. Economic migration is determined by the relative real after-tax compensation rate, relative employment opportunity, and consumer access to variety.

Block 4. Compensation, Prices and Costs

This block includes delivered prices, production costs, equipment cost, the consumption deflator, consumer prices, the price of housing, and the compensation equation. Economic geography concepts account for the productivity and price effects of access to specialized labor, goods, and services.

These prices measure the price of the industry output, taking into account the access to production locations. This access is important due to the specialization of production that takes place within each industry, and because transportation and transaction costs of distance are significant. Composite prices for each industry are then calculated based on the production costs of supplying regions, the effective distance to these regions, and the index of access to the variety of outputs in the industry relative to the access by other uses of the product.

The cost of production for each industry is determined by the cost of labor, capital, fuel, and intermediate inputs. Labor costs reflect a productivity adjustment to account for access to specialized labor, as well as underlying compensation rates. Capital costs include costs of non-residential structures and equipment, while fuel costs incorporate electricity, natural gas, and residual fuels. The consumption deflator converts industry prices to prices for consumption commodities. For potential migrants, the consumer price is additionally calculated to include housing prices. Housing prices change from their initial level depending on changes in income and population density.

Compensation changes are due to changes in labor demand and supply conditions and changes in the national compensation rate. Changes in employment opportunities relative to the labor force and occupational demand change determine compensation rates by industry.

Block 5. Market Shares

The market shares equations measure the proportion of local and export markets that are captured by each industry. These depend on relative production costs, the estimated price elasticity of demand, and the effective distance between the home region and each of the other regions. The change in share of a specific area in any region depends on changes in its delivered price and the quantity it produces compared with the same factors for competitors in that market. The share of local and external markets then drives the exports from and imports to the home economy.

Appendix 2: Detailed Methodology for Data Preparation

Employment, Wages, Value Added, and Output

Employment data was provided to UMDI directly from PPC. Since not all employees worked the full year, and since employees were a mixture of full-time and part-time, an employment number for the PI⁺ model was calculated by dividing the total number of hours worked by PPC employees by the average yearly hours worked for an employee of a non-hotel casino in 2016. Average annual hours were calculated using the average weekly hours worked for workers in a casino without a hotel from the Bureau of Labor Statistics and multiplying it by 52.

The PI⁺ model makes certain assumptions about the expected wages, value-added, output, and intermediate inputs based on employment numbers, region, and industry. Because UMDI had more precise data for all of these values based on actual wages, sales, and vendor spending data, the policy variables for wages, value added, and output were adjusted to reflect known values rather than expected averages. Intermediate inputs were modified as described below.

Intermediate Inputs

PPC provided UMDI with quarterly records of vendor spending, including the vendor name, amount spent, and the zip code of the vendor. The data did not contain information about the industry of the vendor, so UMDI manually assigned NAICS codes to each vendor, making educated guesses when detailed information on the vendor was not available online. These records were then combined and used to populate a list of policy variables for intermediate demand by industry and region, replacing the intermediate demand which would be assumed by the model. Since UMDI was using a PI⁺ model that only included regions of Massachusetts, spending on vendors located outside of the state was not modeled. This may slightly underestimate the actual economic impact of PPC, as new business in other states may have “downstream” effects which positively impact Massachusetts. These effects would likely be very small and are impossible to estimate within the limitations of UMDI’s current model.

Cases where individuals were sent money by PPC were modeled as proprietor’s income in the individual’s home region, since most of the money sent to individuals from PPC were associated with franchise arrangements at the facility.

Commuter Adjustment

Given its location on the border of both the Southeast region and Rhode Island, a much smaller share of PPC wages are earned by workers in the Metro Boston region than the PI⁺ model would assume. UMDI took the difference between the model’s assumptions of wage leakages from the Metro Boston region and the actual wage leakages and used the Commuter Earnings policy variable within the PI⁺ model to adjust them.

Government Spending

As is typical in economic-impact modeling exercises, the assumption was made that any new state or local government revenue would be spent in the same year. Therefore, the amount of government spending imputed into the model is equal to the amount of new government revenue calculated. UMDI also chose to adhere to the best practice of not modeling the fiscal impacts of PPC’s federal tax revenue, as federal fiscal policy is considerably more complex and difficult to estimate.

State government spending was calculated by adding up all of the state taxes paid by PPC in its first fiscal year of operation (except for taxes on gross gaming revenue) and spreading them across the model's six regions based on their previous shares of state government spending. In the Southeast region, the money awarded from the Massachusetts Gaming Commission's Community Mitigation Fund was added to this number. For the first year of operation, this was a very small amount of money, but in future simulations it may be an aspect that is modeled in greater detail.

Local government spending was taken by adding up all of the taxes and host and surrounding community payments paid by PPC to local governments, by region, and adding to it each region's share of new local aid funds coming from taxes on PPC's gross gaming revenue.

As stated earlier, UMDI elected not to model the share of tax revenue from PPC's gross gaming revenue that went to the Race Horse Development Fund. This aspect may be covered in more detail in a future report, should more comprehensive data sources become available.

Consumer Spending

While it may seem counterintuitive, no attempt was made to model the patron spending at PPC. The reason for this is that the impacts of that spending – PPC's employment, wages, vendor spending, and tax payments – are already known, so modeling this spending would create a problem of "double-counting". Instead, SEIGMA's patron survey was used to capture the spending which did not directly occur at PPC, that is, the new off-site spending by PPC visitors, and spending reallocated by Massachusetts residents and visitors from other Massachusetts businesses to PPC.

UMDI estimated the total amount of off-site spending by PPC visitors by taking the ratio of reported off-site spending to the reported on-site non-gambling spending and applying it to the actual on-site non-gambling spending²⁰ of \$6.5 million. The resulting \$3.8 million was then allocated across regions and patron types based on shares of reported income. The off-site spending of patrons who indicated that they would have been in the area regardless of whether PPC had opened or not (reallocated in-state incidental patrons and captured out-of-state incidental patrons) was excluded since it cannot be attributed to PPC. This money was then allocated as new consumer spending on a basket of goods and services estimating the spending behavior of tourists on day-trips. This is based on information provided to UMDI by the Massachusetts Office of Travel and Tourism. Some small adjustments were made to this data based on patron survey expenditure data.

In order to calculate the reallocated spending of in-state patrons, UMDI added up the total amount of reallocated spending (all spending by reallocated in-state patrons and all on-site spending by reallocated in-state incidental patrons) and assigned it to a consumption reallocation variable, based on the home region of the patrons. This variable assumes that the patrons spend less on a general basket of goods and services as they spend more at PPC, with a built in elasticity assumption which designates some consumption items as easier to consume less of than others (for example, it is easier to spend less at restaurants and bars than it is to spend less on rent).

For reallocated out-of-state incidental patrons (out-of-state patrons whose visit to Massachusetts was not prompted by PPC and who would not have otherwise spent their money at an out-of-state casino),

²⁰ PPC did not publicly report their non-gaming revenue but indicated to us that the amount reported in the annual report of their parent company, Penn National Gaming (\$6.5 million), was roughly comparable.

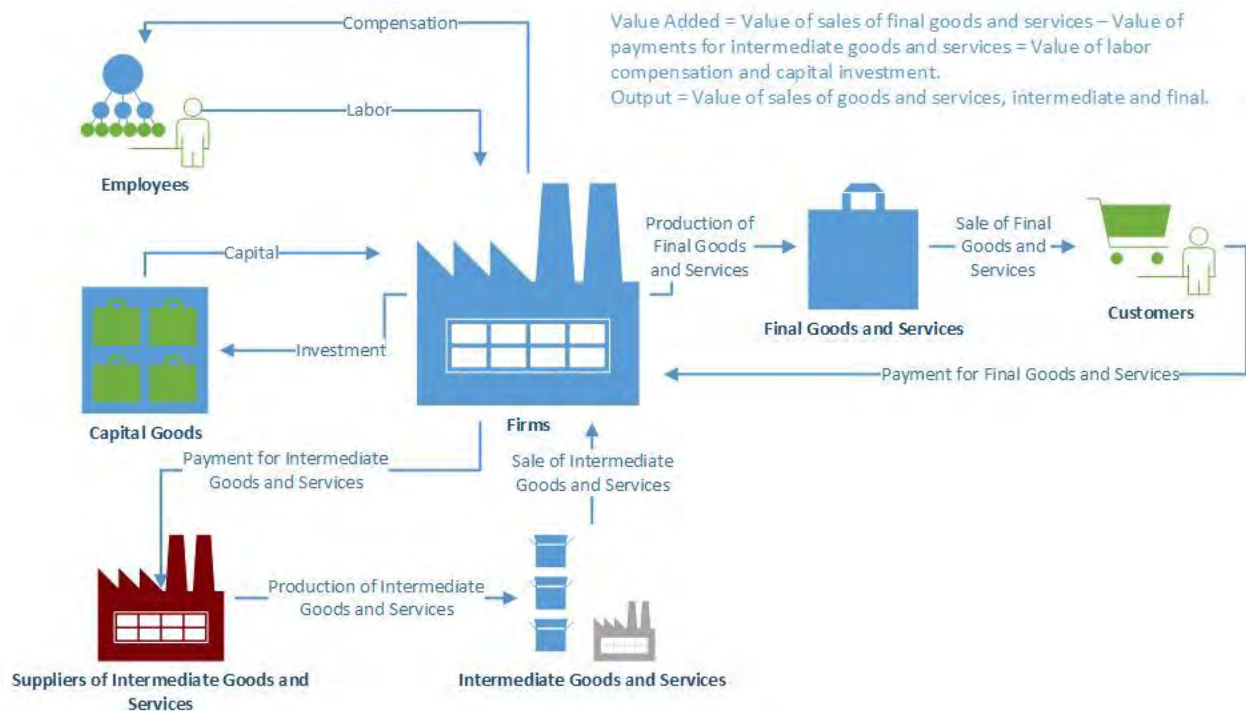
reallocated in-state consumption was spread across another basket of goods and services provided by the Massachusetts Office of Travel and Tourism. This spending was then spread across the 6 regions in the model based on each model's share of consumption of each good or service.

Appendix 3: The Concepts of Output and Value-Added

This appendix serves to clarify the distinctions between two related economic concepts discussed in this report – output and value added.

For any firm to produce goods and services to be sold on the market, it needs to pay for the things required to produce them. It needs to compensate workers for their labor and invest in the capital goods (machinery, for example) which those workers will use. It also needs to purchase intermediate goods and services from other firms. Workers then use the firm’s capital goods to turn the intermediate goods and services purchased from other firms into final goods and services. These final goods and services are the output of the firm, and are equivalent to the value of its sales or revenue.

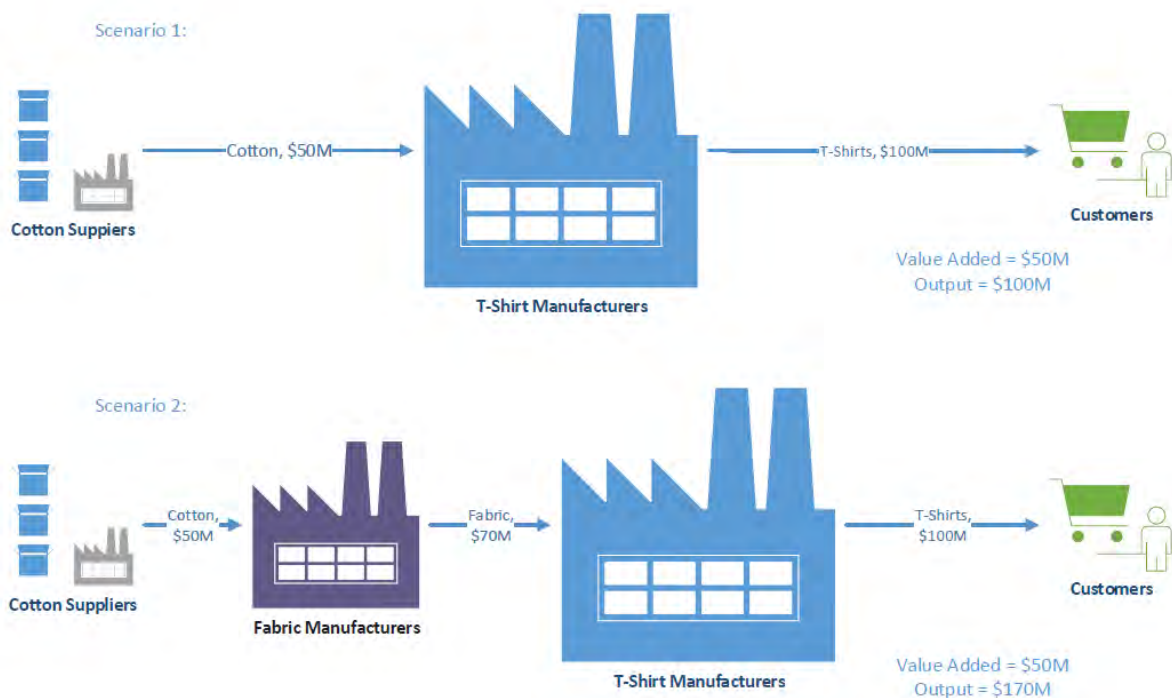
The concept of **value added** captures only the portion of the output which is directly created by the firm’s capital goods and labor. In other words, value added is the value of the final goods and services produced minus the cost of the intermediate goods and services which were purchased to produce them. This can be interesting when examining an individual firm, since two firms can have similar outputs but very different value added, depending on the cost of their intermediate inputs.



Consider the example of two different t-shirt manufacturers whose economic impact on a region is being evaluated. Both of the manufacturers ultimately sell \$100 million in t-shirts, and in order to produce them, both manufacturers use \$50 million in cotton. However, the structure of their supply chains is different. One of the firms takes the cotton and performs every step required to turn the cotton into t-shirts at their facility. For this firm, value added is \$50 million (\$100 million in t-shirts minus \$50 million in cotton) and output is \$100 million. The other manufacturer instead opts to purchase fabric from a third party fabric manufacturer, which has taken the \$50 million in cotton and turned it

into \$70 million in fabric. When considering the economic impact of this operation, both firms will need to be considered. The fabric manufacturer has a value added of \$20 million (\$70 million in fabric minus \$50 million in cotton) and an output of \$70 million. The t-shirt manufacturer has a value added of \$30 million (\$100 million in t-shirts minus \$70 million in fabric) and an output of \$100 million, the same as the original factory. Considered together, this second operation has a combined value added of \$50 million, the same as the first example, but a combined output of \$170 million, much higher than the initial example. The lesson from this is that while output is a useful economic metric in many cases, it has the potential to double count the production of some goods and services and is best presented alongside value added for context.

Example: How change in supply chains can change output without changing value added



Appendix 4: Patron Survey Tables

Table 21: Share of On-Site Gambling Spending by Patron Type

Patron Type	Share of Respondents	Spending	Share of Spending
Recaptured In-State	54.5%	\$96,726,780	58.3%
Reallocated In-State	16.9%	\$27,141,634	16.3%
Reallocated In-State Incidental	7.4%	\$6,718,167	4.0%
New Out-of-State*	9.7%*	\$24,680,357*	14.9%*
Captured Out-of-state Incidental	10.1%	\$9,625,773	5.8%
Reallocated Out-of-State Incidental**	1.6%**	\$1,154,226**	0.7%**
Total	100.0%	\$166,046,937	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 22: Share of On-Site Non-Gambling Spending by Patron Type

Patron Type	Share of Respondents	Spending	Share of Spending
Recaptured In-State	56.2%	\$3,275,716	50.4%
Reallocated In-State	16.9%	\$2,446,034	37.6%*
Reallocated In-State Incidental	9.3%	\$265,638	4.1%
New Out-of-State*	7.0%*	\$182,147*	2.8%*
Captured Out-of-state Incidental	9.8%	\$293,120	4.5%*
Reallocated Out-of-State Incidental**	0.8%**	\$37,345**	0.6%**
Total	100.0%	\$6,500,000	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 23: Share of Recaptured Patron Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston	50.6%	\$48,033,288	49.7%
Southeast	34.7%	\$34,995,798	36.2%
Central*	10.0%*	\$5,826,044*	6.0%*
Pioneer Valley**	1.4%**	\$2,510,043**	2.6%**
Cape and Islands*	3.3%*	\$5,361,608*	5.5%*
Total	100.0%	\$96,726,780	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 24: Share of Recaptured Patron On-Site Non-Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston	52.9%	\$2,175,791	66.4%
Southeast	30.8%	\$631,980	19.3%
Central*	11.9%*	\$260,280*	7.9%*
Pioneer Valley**	2.2%**	\$62,863**	1.9%**
Cape and Islands**	2.2%**	\$144,802**	4.4%**
Total	100.0%	\$3,275,716	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 25: Share of Reallocated In-State Patron Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston*	71.6%*	\$13,053,454*	48.1%*
Southeast*	23.6%*	\$13,046,140*	48.1%*
Central**	4.8%**	\$1,042,039**	3.8%**
Total	100.0%	\$27,141,634	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 26: Share of Reallocated In-State Patron On-Site Non-Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston*	82.9%*	\$2,224,364*	90.9%*
Southeast*	11.3%*	\$186,045*	7.6%*
Central**	5.8%**	\$35,625**	1.5%**
Total	100.0%	\$2,446,034	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 27: Share of Reallocated In-State Incidental Patron Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston*	60.6%*	\$4,208,345*	62.6%*
Southeast*	29.9%*	\$1,935,547*	28.8%*
Central**	4.9%**	\$400,678**	6.0%**
Pioneer Valley**	3.2%**	\$173,597**	2.6%**
Cape and Islands**	1.4%**	\$0**	0.0%**
Total	100.0%	\$6,718,167	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 28: Share of Reallocated In-State Incidental Patron On-Site Non-Gambling Spending by REMI Region

REMI Region	Share of Respondents	Spending	Share of Spending
Metro Boston*	55.0%*	\$127,351*	47.9%*
Southeast*	31.3%*	\$67,704*	25.5%*
Central**	7.7%**	\$44,959**	16.9%**
Pioneer Valley**	4.1%**	\$16,800**	6.3%**
Cape and Islands**	1.9%**	\$8,824**	3.3%**
Total	100.0%	\$265,638	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.

Table 29: Reallocated In-State Patron Off-Site Spending by REMI Region

Patron Type	Share of Respondents	Spending	Share of Spending
Metro Boston*	89.4%*	\$420,160*	88.3%*
Southeast**	5.3%**	\$20,785**	6.2%**
Central**	5.3%**	\$26,013**	5.5%**
Total	100.0%	\$728,704	100.0%

Source: SEIGMA Patron Survey

Note: An asterisk indicates estimates are unreliable, relative standard error > 30%, while two asterisks indicates that the cell size is less than 6.



MGM SPRINGFIELD

City of Springfield Hiring Strategy



Marikate Murren VP, Human Resources MGMS | Wanda Smith-Gispert VP, Talent & WFD, MGM Regional Operations

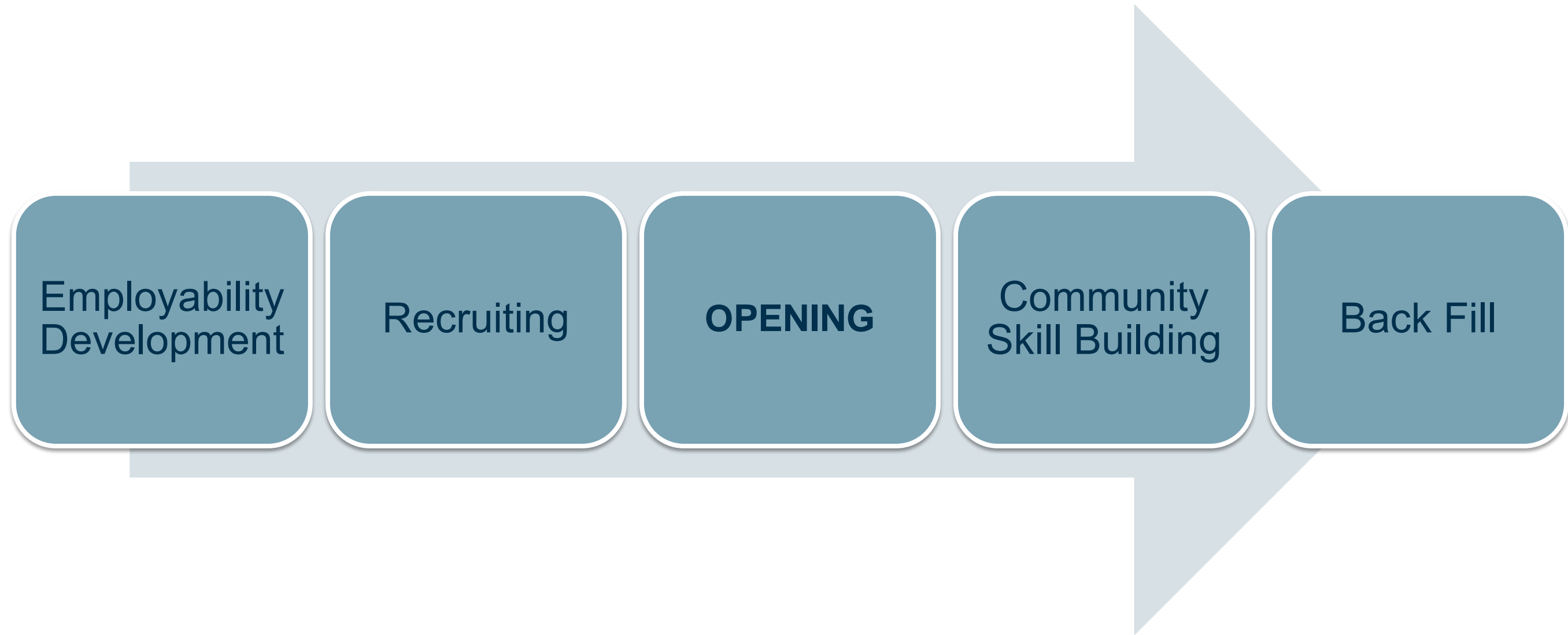


OUR COMMITMENTS

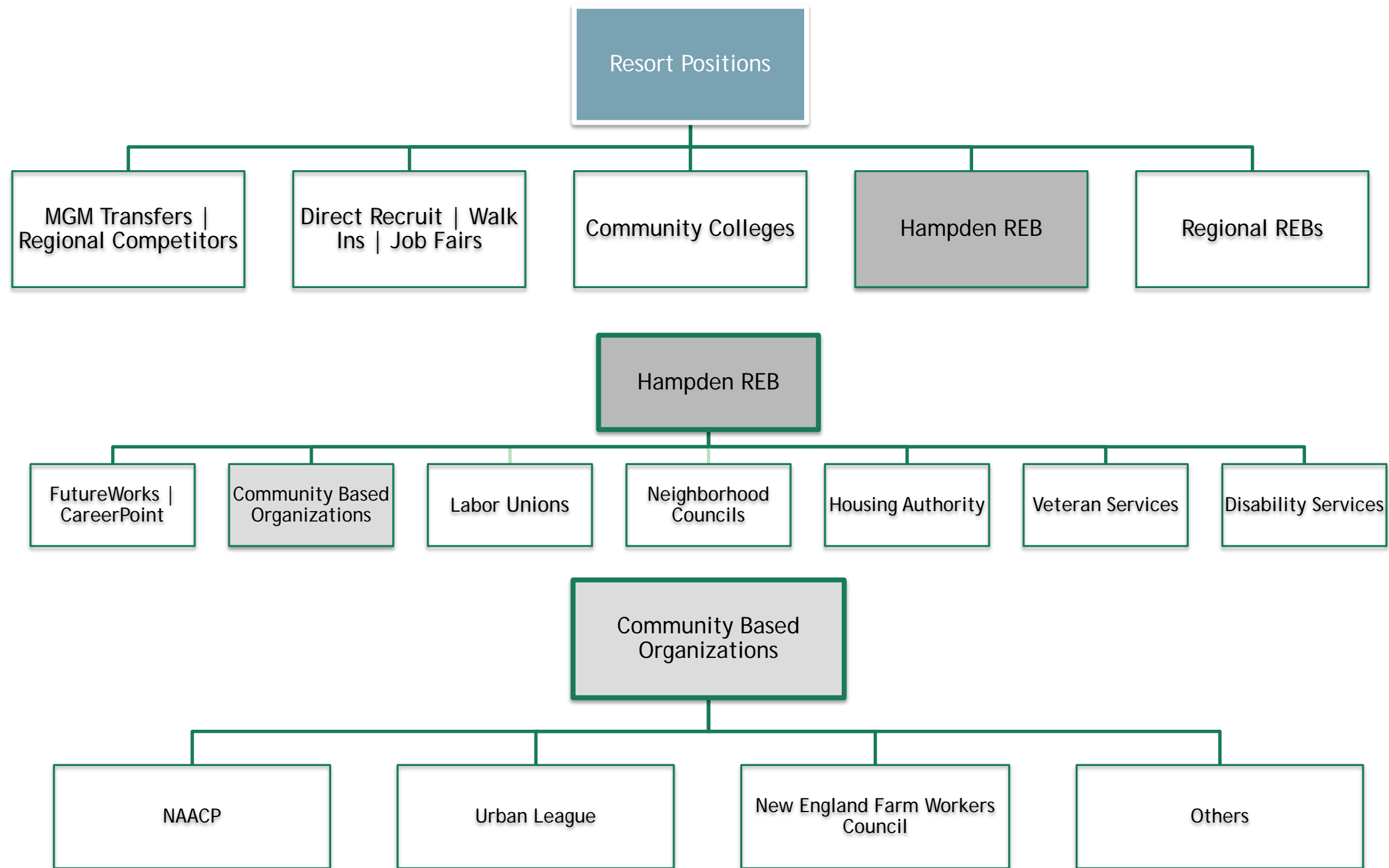
- 3,000 Headcount Jobs
- 80% Full-time | 20% Part-time
- 90% Local and Regional Hires
- **35% City of Springfield Hires**
- 50% Minority Hires
- 50% Women Hires
- 2% Veteran Hires



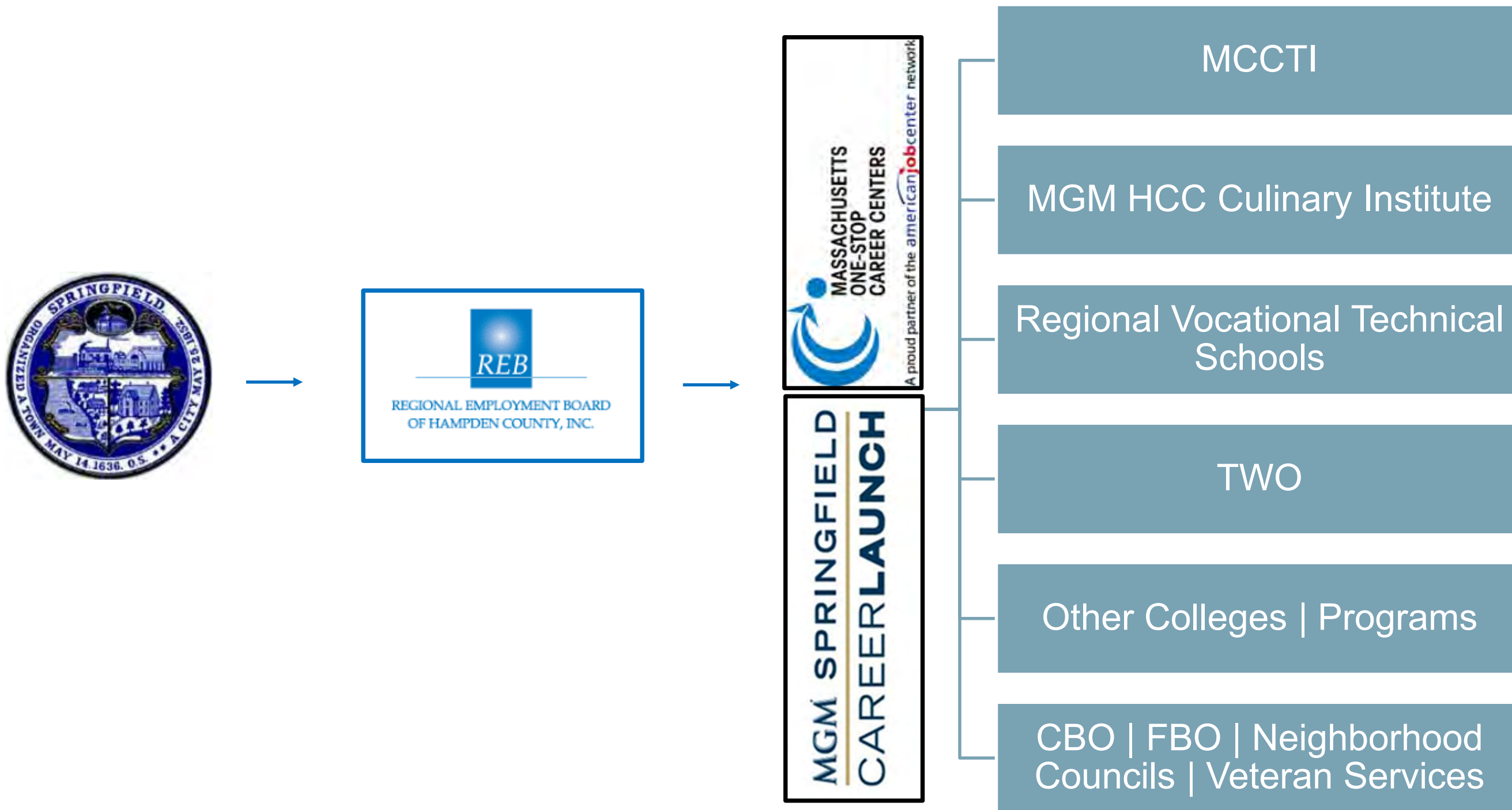
WORKFORCE STRATEGY



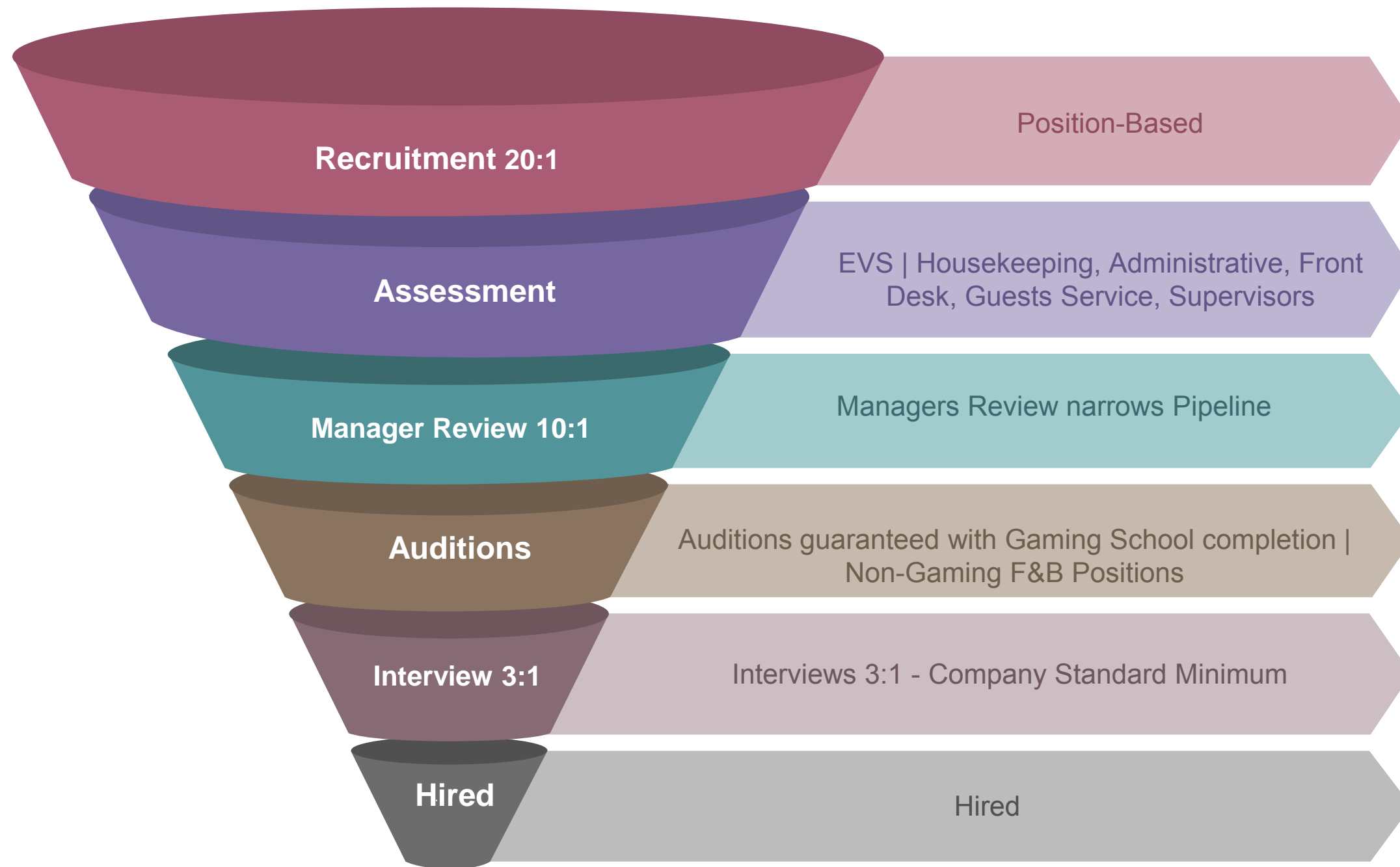
SOURCING STRATEGY



SPRINGFIELD RECRUITMENT STRATEGY



SELECTION PROCESS





APPENDIX

- Springfield Works
- MGC Mitigation Fund Grants
- Westfield Technical Academy
- Disabled Slot Technician Partnership
- AARP Partnership
- Pre-Apprentice Training Program





SPRINGFIELD WORKS



Five Massachusetts Cities awarded a total of \$2.8 million in the Boston Fed's Working Cities Challenge

Haverhill, Lowell, Pittsfield, Springfield, and Worcester each receive \$475,000 in second round of competition focused on cross-sector collaboration

June 1, 2016



Boston, Mass. – The Federal Reserve Bank of Boston today announced that Haverhill, Lowell, Pittsfield, Springfield, and Worcester will each receive \$475,000 in the second round of the Working Cities Challenge, a competition for smaller cities in New England focused on building collaborative leadership, which is shown to be a critical element in economic growth for struggling postindustrial cities.

The Working Cities Challenge is a competitive grant program administered by the Boston Fed and designed to get the public, private and nonprofit sectors in Massachusetts' postindustrial Gateway Cities working together to solve economic challenges.

Springfield is committed to advancing the city's economy by eliminating the disconnect between employers who need qualified workers and low income Springfield residents who need meaningful employment through an innovative collaboration between employers, public schools, colleges, social service providers and residents.

The goal is to empower low income residents to be the scalable, robust, work ready pipeline employers demand. We understand that this effort will require systems change, significant employer and resident engagement, and broad cross sector collaboration.

Springfield: The Springfield Works Initiative will advance the city's economy by enhancing and strengthening the connectivity between employers who need qualified workers and low-income Springfield residents who need meaningful employment.

- We envision achieving this goal through an innovative collaboration between employers, educational institutions, service providers, community leaders, community-based organizations, government, and residents.
- The Springfield Works Initiative core team includes: Western Massachusetts Economic Development Council, Springfield Planning and Economic Development, Regional Employment Board of Hampden, MGM Springfield, Partners for Community Action, HAP Housing, Springfield Technical Community College, Western MA National Machine and Tooling Association, Community Foundation of Western Massachusetts, Tech Foundry, United Personnel Services, United Way of Pioneer Valley, Develop Springfield, and the Springfield Public Schools.

Strategies & Actions

1. Increased Connectivity & Collaboration
2. All-inclusive Distributed Coaching/Mentoring Case Management System
3. Political and Policy Advocacy & Awareness
4. Established Employer Engagement
5. Data Driven Change



WORKFORCE DEVELOPMENT PILOT PROGRAMS



MGC Workforce Development Pilot Program



For Immediate Release
June 30, 2017

Media Contact:
Elaine Driscoll (MGC) 617-571-2964
Press release: 17-034

The Massachusetts Gaming Commission Approves Grants to Support Workforce Development Pilot Program

On June 28, 2017, members of the Massachusetts Gaming Commission (MGC) approved close to \$600,000 in grants for a Workforce Development Pilot Program designed to fund gaming career pathways for local residents. The Workforce Program is a component of the 2017 Community Mitigation Fund, which was established by the Gaming Law to help entities offset costs related to the construction and operations of gaming establishments.

The Workforce Program was developed to provide interested residents in gaming regions the ability to attain academic and occupational credentials needed to work in the most in-demand occupations related to the gaming industry. Additionally it was established to assist the unemployed or underemployed to either get their GED or Adult Basic Education ("ABE") which would position them to get future jobs in the casino industry or training in advance by the backfilling of jobs.

"Workforce development programs are a critical component of job creation, economic opportunity and the Commonwealth's ability to meet gaming's burgeoning hiring demand," said MGC Chairman Steve Crosby. "MGC looks forward to further collaborations as we continue to work together to ensure that we are able to deliver on our legislative mandate to establish a highly-skilled and diverse Massachusetts workforce for the state's new casino industry."

The Workforce Program was developed to provide interested residents in gaming regions the ability to attain academic and occupational credentials needed to work in the most in demand occupations related to the gaming industry. Additionally it was established to assist the unemployed or underemployed to either get their GED or Adult Basic Education ("ABE") which would position them to get future jobs in the casino industry or training in advance by the backfilling of jobs.

Springfield Public Schools

Entity	Program	Awarded Amount	Summary
Springfield Public Schools	Ahead of the Game Program	\$171,833.03	<ul style="list-style-type: none">• The Springfield Public Schools will establish an initiative called “Ahead of the Game” program which will target low-skill, low-income adults, interested in pursuing long term careers with MGM Springfield.• The Ahead of the Game program will focus on individuals looking to obtain their adult basic education (ABE) or GED, in order to pursue higher education.• The goal of this program will be to prepare low-income adults for enrollment into postsecondary workforce training programs relevant to the needs of MGM Springfield.



Springfield Technical Community College

Entity	Program	Awarded Amount	Summary
Springfield Technical Community College	Hampden Prep	\$200,000	<ul style="list-style-type: none">Springfield Technical Community College (STCC), in collaboration with Holyoke Community College (HCC) proposes to develop and implement an innovative High School Equivalency (HSE) and workforce readiness program, Hampden Prep.The overarching goal of Hampden Prep is to accelerate ABE, HiSET prep and developmental programs for Hampden County residents and to provide non-traditional students the supports needed to complete postsecondary credentials in areas recognized by employers in the Springfield labor market.





LOCAL TRAINING OPPORTUNITIES | PROGRAMS



Free Career Readiness Training Sessions

- Luxury Guest Service
- Master Job Skills: Keys to Workplace Success
- Interview Prep
- MGM Springfield Career Day
- Digital Resume Prep Workshops



Westfield Technical Academy

Successful students completing this program will be able to pursue a post-secondary two- or four-year degree in Culinary Arts, Hospitality or Food Service Management



Upon graduation, students are eligible for immediate employment in an accelerated entry-level culinary position in any food service establishment such as restaurants, casinos, commercial kitchens, catering facilities, retail or commercial bakeries, corporate dining or institutional food service companies

Local Area High Schools MGM Springfield Career Day

Career Prep Workshops

Courses include:

- Hospitality Guest Service Training
- Resume/Interview Prep
- Building a winning SkillSmart Profile
- Success Job Skills to Advance
- Digital Resume Prep Workshops

Disabled Slot Technician Partnership



Gaming and Vending Certification



ETA® International Gaming and Vending Technician (GVT) Certification Program:

Gaming and Vending Technicians (GVT) install, repair, service, or calibrate gaming and vending type equipment such as arcade games, slot machines, and/or vending machines. *

The certified Gaming and Vending Technician (GVT) will be required to properly perform and have knowledge of the following:

- Money Handling
- Basic Electronics Concepts
- Computer Hardware, Networking and Display Technologies
- Safety Precautions and Protection
- Electrical Safety
- Electrical Fundamentals



The Gaming industry is one of the fastest growing industries in the service sector. According to the United States Bureau of Labor Statistics, over the next seven years the employment growth rate is expected to be



We have partnered with VAe to have disabled veterans trained to fill our slot technician positions
<https://vaeilc.com/>

Divisi	Dept	Department	Position	Lev	Springfield Revised					Start Date		
					SF FT HC	SF PT H	SF OC H	SF HC	SF FTE			
											PT Hrs: 20.0	
											OC Hrs.: 15.0	
CASINO	11000	SLOT TECHNICAL	MGR SLOT TECHNICAL	11	1.0	-	-	1.0	1.0	Feb-18		
CASINO	11000	SLOT TECHNICAL	SHIFT MGR SLOT TECHNICAL	0	-	-	-	-	-			
CASINO	11000	SLOT TECHNICAL	SLOT TECHNICAL SUPERVISOR	9	4.0	-	-	4.0	4.0	Jul-18		
CASINO	11000	SLOT TECHNICAL	ELECTRONIC TECHNICIAN	9	3.0	-	-	3.0	3.0	Mar-18		
CASINO	11000	SLOT TECHNICAL	SLOT TECH	8	18.0	-	-	18.0	18.0	May-18		

MGM Resorts International Partners with AARP

The AARP Employer Pledge Program is a national effort to help employers solve their current and future staffing challenges and direct job seekers to employers that value and are hiring experienced workers. MGM Resorts has signed the Employer Pledge of support and hires.

Working with AARP, participating organizations have signed a pledge that they:

- Believe in equal opportunity for all workers, regardless of age
- Believe that 50+ workers should have a level playing field in their ability to compete for and obtain jobs
- Recognize the value of experienced workers
- Recruit across diverse age groups and consider all applicants on an equal basis.

Learn More:

<http://www.aarp.org/work/job-search/employer-pledge-companies/?intcmp=AE-WOR-ERC-MAIN-PRGMS-SPOT1>



Pre-Apprentice Training Program

The objective of the Hospitality Pre-Apprentice Training Program is to prepare participants to work in a variety of positions by providing job specific, foundational courses and an introduction to luxury guest service. The program will also include training on life skills, resume building and interview coaching. Upon completion, each student will receive assistance applying to 3 positions at MGM Springfield or any local hospitality jobs in Springfield. This program is designed to benefit all employers in the Springfield area with open positions in hospitality.

Target Goal of Participants: 800-1,200

Estimated Start Date: February 2018

Cycles Offered: 10 Cycles of classes | **Total Duration:** 7 Months

Occupations Included:

- 43-3041.00 Cage Cashiers
- 35-3031.00 Restaurant Servers
- 35-3022.00 Fountain Workers
- 37-2011.00 Casino Porters
- 41-2012.00 Guest Services Slots Representatives
- 33-9032.00 Security Officers
- 35-9011.00 Busser/Runners





TO: Commissioners

FROM: John Ziemba

CC: Ed Bedrosian, Executive Director
Catherine Blue, General Counsel

DATE: October 10, 2017

RE: Recommendations for Appointments under the Gaming Policy Advisory Committee

Pursuant to M.G.L. c. 23K, Section 68, the Commission is required to make appointments to several committees under the Gaming Policy Advisory Committee (“GPAC”). Two new members are being presented today for consideration to the Region A and Region B Local Community Mitigation Advisory Committees (“LCMAC”). I recommend that the Commission consider appointing such members for a one year term. I also recommend that these appointees serve at the pleasure of the Commission. Their brief biographies are included below.

As you are aware, the purpose of these LCMAC’s are to provide information and develop recommendations for the Community Mitigation Advisory Subcommittee on issues related to the gaming facilities in each region and present information to the Commission on any issues related to the gaming establishment located in each region.

Region A LCMAC

Mayra I. Negrón-Rivera - Human Service Provider

Ms. Negrón-Rivera is presently the Chief Operation Officer at Inquilinos Boricuas En Acción in Boston. Inquilinos Boricuas En Acción is a non-profit organization and community development corporation offering affordable housing and supportive programming to improve knowledge, life skills and health of participants of all ages.

Mayra I. Negrón-Rivera has almost 20 years of experience in business, finance, and operations. She is in charge of Real Estate, Asset Management and Property Management of a Community Development Corporation of 521 Unit Portfolio.

She started at IBA in 2000 as an accountant, and steadily took on roles with increasing responsibility – growing from senior accountant, to Chief Financial Officer, Chief Financial and Administration Officer, and into her current role as COO in 2013. In 2009, she spent four months as IBA’s Interim CEO, while CEO was on a Barr Fellowship sabbatical. She currently oversees all of IBA’s administrative functions, including property management, asset management, and real estate development. Prior to her work with IBA, she served as operations manager at Negron Ice and Water in Puerto Rico.



Massachusetts Gaming Commission

Her civic involvement includes membership on boards and committees at organizations ranging from Boston Redevelopment Authority-CAC, Dana Farber, South End Community Health Center, Massachusetts General Hospital, O'Bryant and Blackstone Schools, and Boston Real Estate Investors Association.

She holds a BA in business administration from the University of Puerto Rico.

Region B LCMAC

Kim Lee - Human Service Provider

Ms. Lee is presently the Vice President of development, marketing and communications for the Center for Human Development ("CHD") in Springfield. CHD is a non-profit organization that delivers a broad array of critical social and mental health services to over 18,000 people each year in western Massachusetts and Connecticut.

Kimberley A. Lee – Bio

Kim Lee is an experienced builder of collaborative relationships that support strong, inclusive and productive communities. As a leader in several nonprofit organizations, Kim has advocated for the populations served through constant policy influence at the local, community and state level, leading to effective government/non-profit relationships and satisfied customers.

During a career spanning three decades, Kim has demonstrated consistent achievement in managing resources, building strategic corporate, state and nonprofit alliances, identifying and tapping new revenue sources, and working to implement innovative solutions delivered through non-profit businesses. Along the way she has built extensive relationships with her peers in non-profit and for-profit organizations, with municipal and state government officials, and with local and regional media.

Kim began her career as a communication specialist and found her niche in the non-profit sector, where she has held a variety of senior and executive positions in Marketing, Advancement and Development. She is currently Vice President of Development for CHD (Center for Human Development), a nonprofit, CARF-accredited organization providing a broad range of high quality, community-oriented human services to 17,000 children, adolescents, adults, and families each year.

Kim holds a bachelor's degree in Mass Communication from Westfield State College. For 25 years, she has lived in Wilbraham with her husband Kevin (a Springfield homicide detective) and their two teen-aged daughters.

Kimberley A. Lee
15 Scenic Drive • Wilbraham, MA 01095
413-596-6102 • 413-563-6049 (c)
kimlee2727@gmail.com

CAPABILITIES

Builder of collaborative relationships that support strong, inclusive and productive communities

Leader demonstrating consistent achievement in identifying and tapping new revenue sources and strategic corporate, state and non-profit alliances

Change agent with proven ability to anticipate trends and stay ahead of the curve

Innovator in the design and implementation of creative programming

Communicator leveraging extensive, established relationships with local and regional media

Spokesperson with special skills in public relations and crisis communication

Developer of special events and promotional campaigns

TRACK RECORD

Advanced advocacy including policy influence at the local, community and state level, leading to more effective government/nonprofit relationships

Identified and developed business partnerships, community collaborations and strategic alliances to diversify funding sources and grow new revenue

Provided administrative oversight to new child and family wellness initiatives to support state and federal nutrition guidelines—a state-wide replicable model

Designed and implemented community-wide branding and organizational positioning initiatives to ensure participation on local, state and regional issues affecting children and families

Pitched and placed stories in media including *The David Letterman Show*, *USA Today*, *The Wall Street Journal*, *The New York Times*, *The Washington Post* and local media across Massachusetts

Unity First Magazine's 2012 Woman of Vision Award winner

PROFESSIONAL EXPERIENCE

CHD (Center for Human Development), Springfield, MA
Vice President of Development: Since March 2015

Square One, Springfield, MA
Vice President of Advancement: January 2002 – March 2015

Western New England College, Springfield, MA
Adjunct Professor of Communications: September 2005 – January 2007

Basketball Hall of Fame, Springfield, MA
Senior Director of Marketing: June 1999 – December 2001

United Way of Pioneer Valley, Springfield, MA
Vice President of Marketing: April 1993 – June 1999

Adams & Knight Communications, Glastonbury, CT
Freelance Copywriter: March 1996 – September 1996

Monarch Financial Services, Holyoke, MA
Communications Specialist: February 1989 – January 1992

EDUCATION

Westfield State College: BA Communications
Springfield Classical High School: Diploma

CERTIFICATION

Youth Mental Health First Aid Certified Trainer

SELECTED AFFILIATIONS

Hampden-Wilbraham Regional School District, Safe and Healthy Schools Coalition
The Network to End Homelessness, Leadership Council
Pioneer Valley Press Club, Panelist
Wilbraham PTO, Fundraising Chair
Family Advocacy Center, Advisory Committee
2012 Woman of Vision Award Recipient – Unity First Magazine
2014 Graduate of the Greater Springfield Chamber of Commerce Leadership Institute

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 146.00: GAMING EQUIPMENT

- 146.01: Gaming Chips (General Rules)
- 146.02: Receipt of Gaming Chips or Plaques from Manufacturer or Distributor; Inventory, Security, Storage and Destruction of Chips and Plaques
- 146.03: Value Gaming Chips
- 146.04: Non-value Gaming Chips
- 146.05: Non-value Chips; Permitted Uses; Inventory and Impressment
- 146.06: Tournament chips
- 146.07: Poker Rake Chips
- 146.08: Gaming Plaques; Issuance and Use; Denominations; Physical Characteristics
- 146.09: Exchange and Redemption of Gaming Chips, Plaques and Coupons
- 146.10: Roulette Wheel and Table; Physical Characteristics; Double Zero Roulette Wheel Used as a Single Roulette Wheel
- 146.11: Roulette Balls
- 146.12: Roulette; Inspection Procedures; Security Procedures
- 146.13: Blackjack Table, Card Reader Device; Physical Characteristics; Inspections
- 146.14: Three-card Poker Table; Physical Characteristics
- 146.15: Spanish 21 Table; Physical Characteristics
- 146.16: Blackjack Switch Table; Physical Characteristics
- 146.17: Craps and Mini-craps Tables; Physical Characteristics
- 146.18: Baccarat, Midi-baccarat, and Mini-baccarat Tables; Physical Characteristics
- 146.19: Big Six Wheel and Layout; Physical Characteristics
- 146.20: Sic Bo Table; Sic Bo Shaker; Physical Characteristics
- 146.21: Pai Gow Poker Table; Pai Gow Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.22: Pai Gow Table; Pai Gow Shaker; Physical Characteristics
- 146.23: RESERVED
- 146.24: Poker Table; Physical Characteristics
- 146.25: Double Down Stud Table; Physical Characteristics
- 146.26: Caribbean Stud Poker Table; Physical Characteristics
- 146.27: Let It Ride Poker Table; Physical Characteristics
- 146.28: RESERVED
- 146.29: Fast Action Hold'em Table; Physical Characteristics
- 146.30: Casino War Table; Physical Characteristics
- 146.31: Colorado Hold'em Poker Table; Physical Characteristics

- 146.32: Boston 5 Stud Poker Table; Physical Characteristics
- 146.33: Double Cross Poker Table; Physical Characteristics
- 146.34: Double Attack Blackjack Table; Physical Characteristics
- 146.35: Four-card Poker Table; Physical Characteristics
- 146.36: Texas Hold'em Bonus Poker Table; Physical Characteristics
- 146.37: Flop Poker Table; Physical Characteristics
- 146.38: Two-card Joker Poker Table; Physical Characteristics
- 146.39: Asia Poker Table, Asia Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.40: Ultimate Texas Hold'em Table; Physical Characteristics
- 146.41: Winner's Pot Poker Table; Physical Characteristics
- 146.42: Supreme Pai Gow Table; Pai Gow Poker Shaker; Physical Characteristics; Computerized Random Number Generator
- 146.43: Mississippi Stud; Physical Characteristics
- 146.44: Red Dog Table; Physical Characteristics
- 146.45: Dice; Physical Characteristics
- 146.46: Dice; Receipt; Storage; Inspections; and Removal From Use
- 146.47: Manual and Automated Dice Shakers; Security Procedures
- 146.48: Cards; Physical Characteristics
- 146.49: Cards; Receipt, Storage, Inspections and Removal From Use
- 146.50: Pre-shuffled and Pre-inspected Cards
- 146.51: Dealing Shoes; Automated Shuffling Devices
- 146.52: Pai Gow Tiles; Physical Characteristics
- 146.53: Pai Gow Tiles; Receipt; Storage; Inspections and Removal From Use
- 146.54: Inspection and Approval of Gaming Equipment and Related Devices and Software
- 146.55: Approval of Gaming Equipment / Approval of New Gaming Equipment
- 146.56: Security of Gaming Equipment / Licensee sale of Gaming Equipment
- 146.57: RESERVED
- 146.58: Crazy 4 poker; Physical Characteristics
- 146.59: Criss Cross poker; Physical Characteristics
- 146.60: Free Bet BlackJack; Physical Characteristics
- 146.61: Heads Up Hold'em; Physical Characteristics
- 146.62: High Card Flush; Physical Characteristics

146.01: Gaming Chips and Plaques (General Rules)

- (1) No gaming chip shall be utilized by a gaming licensee in a gaming establishment until:
 - (a) The design specifications of the proposed gaming chip, prior to the manufacture of the gaming chip, are submitted to and approved by the Bureau, which submission shall include a detailed schematic depicting the actual size and, as appropriate, location of the following:
 1. Each “face” of the gaming chip, which is the flat surface across which the diameter of the chip can be measured including any indentations or impressions;
 2. The “edge” of the gaming chip, which is the surface of the chip across which its thickness can be measured in a perpendicular line from one face to the other; and
 3. Any colors, words, designs, graphics or security measures contained on or within the gaming chip;
 - (b) A sample stack of 20 gaming chips, manufactured in accordance with its approved design specifications, is submitted to and approved by the Bureau; and
 - (c) The Bureau has confirmed that the identification requirements of 205 CMR 146.01 are visible using the gaming licensee’s closed circuit television system.
- (2) Each gaming chip issued by a gaming licensee shall be designed and manufactured with sufficient graphics or other security measures including, at a minimum, those features specifically required to appear on the face or edge of a gaming chip pursuant to 205 CMR 146.01 so as to prevent, to the greatest extent possible, the counterfeiting of the gaming chip.
- (3) No gaming licensee shall use or redeem in its gaming establishment any gaming chip that it knows, or reasonably should know, is materially different from the approved sample or no longer conforms to the requirements of 205 CMR 146.01.
- (4) No gaming licensee or other person licensed by the Commission shall manufacture for, sell to, distribute to, or use in any facility outside of Massachusetts any gaming chips having the same edge spot and design specifications as those approved for use in Massachusetts gaming establishments.
- (5) A gaming licensee may issue promotional non-gaming chips that are prohibited from use for gaming in any gaming establishment. The physical characteristics of such chips shall be sufficiently distinguishable from approved design specifications of any gaming chip issued by any gaming licensee so as to reasonably ensure that they will not be confused with authorized gaming chips. At a minimum, such promotional non-gaming chips shall:
 - (a) Be unique in terms of size or color;
 - (b) Have no edge designs unique to gaming chips; and

(c) Bear the name of the gaming licensee issuing them and language on both faces stating that they have no redeemable value.

(6) A gaming licensee shall remove a set of gaming chips in use from active play whenever it has reason to believe the gaming establishment has accepted counterfeit chips or whenever any other impropriety or defect in the utilization of that set of chips makes removal of the chips in active use necessary or whenever the Bureau so directs. An approved back-up set of value chips or non-value chips shall be placed into active play whenever an active set is removed.

(7) Whenever chips in active use are removed from play, the gaming licensee shall immediately notify the Bureau of the removal and the reason for removal.

(8) Each set of gaming chips approved by the Bureau for use by a gaming licensee shall receive a unique and permanent alphabetical designation. This designation shall be assigned by the gaming licensee during the design schematic approval process and shall be used for all inventory procedures required by 205 CMR 146.02. If a gaming licensee elects to commingle gaming chips pursuant to 205 CMR 146.02, in addition to the assigned alphabetical designation for that set of chips, each different sample within the set shall also be assigned an accompanying unique numeric designation.

(9) If a licensee uses RFID chips or plaques they must submit a detailed description of the technology and devices proposed for use at the gaming establishment. Any certifications or testing done by an independent testing lab that is certified by the Commission pursuant to 205 CMR 144.06 must be included in the submission. Policies and procedures describing how the RFID chips and related equipment will be used must be submitted to the Commission.

146.02: Receipt of gaming chips or plaques from manufacturer or distributor; inventory, security, storage and destruction of chips and plaques

(1) When gaming chips or plaques are received from the manufacturer or distributor, they shall be opened and inspected by at least three employees, one of whom shall be from the accounting or auditing department of the gaming licensee, one of whom shall be from the games department, and one from any mandatory department other than the surveillance department of the gaming licensee.

(2) Each gaming licensee shall report to the Bureau promptly after an inspection performed pursuant to 205 CMR 146.02(1) if the inspection discloses any discrepancy between the invoice accompanying the chips and plaques and the actual chips or plaques received or any defects found in such chips or plaques.

(3) After inspecting the gaming chips or plaques received, the gaming licensee shall cause to be recorded in a chip inventory ledger (manual or electronic) the assigned alphabetical designation, the denomination of the value chips and gaming plaques received, the number of each denomination of value chip and gaming plaque received, the number and description of all non-value chips received, the date of such receipt, and the signatures of the employees who inspected such chips and plaques. If the chips or plaques are required to have a unique serial number, the numeric number shall also be recorded. If the gaming chips or plaques are not put into active use, the ledger shall also identify the storage location.

(4) Any gaming chips or plaques not in active use shall be stored in:

- (a) An approved vault;
- (b) The cashiers' cage; or
- (c) A comparable secure area, approved by the Bureau, which is adjacent to and accessible exclusively from the gaming floor.

(5) Whenever any gaming chips or plaques are removed from or returned to an approved storage area, at least two employees shall be present, one of whom shall be a supervisor from the games or security department, and the following information shall be recorded in the chip inventory ledger together with the date and signatures of the employees involved:

- (a) The alphabetical designation and, if applicable, any numeric designation;
- (b) The number and dollar amount for each denomination of value chip or gaming plaque removed or returned;
- (c) The number and description of the non-value chips removed or returned;
- (d) The specific storage area being entered; and
- (e) The reason for the entry into the storage area.

(6) At the end of each gaming day, a gaming licensee shall compute and record the unredeemed liability for each denomination of value chips and gaming plaques. At least once every 30 days, at a minimum, each gaming licensee shall inventory all sets of value chips and gaming plaques in its possession and shall record the result of such inventory in the chip inventory ledger. The procedures to be utilized to compute the unredeemed liability and to inventory value chips and gaming plaques shall be submitted to the Bureau. A physical inventory of value chips and gaming plaques not in active use shall only be required annually if the inventory procedures incorporate the sealing of the locked compartment. If a gaming licensee elects to commingle gaming chips, a member of the gaming establishment's accounting department shall, at least once every six months, inventory all gaming chips of a particular sample and readjust the starting inventory for those gaming chips which are no longer in the possession of the gaming licensee. The adjusted inventory figure shall be recorded in the chip inventory ledger and shall be the new beginning inventory figure for the next six-month period for purposes of computing the daily outstanding chip liability required by this section.

(7) The Bureau shall approve the process for the destruction of chips and plaques. Prior to the destruction of gaming chips and plaques, the gaming licensee shall notify the Bureau, in writing, of the date and the location at which the destruction will be performed, the denomination, number and amount of value chips and plaques to be destroyed, and the description and number of non-value chips to be destroyed. Unless otherwise authorized by the Bureau, the destruction of gaming chips and plaques shall be carried out in the presence of at least two employees of the gaming licensee, one of whom shall be from the accounting department and one of whom shall be from any other mandatory department other than the surveillance department. The denomination, number and amount of value chips and plaques or, in the case of non-value chips, the description and number so destroyed shall be recorded in the chip inventory ledger together with the signatures of the individuals carrying out such destruction, and the date on which the destruction occurred. The gaming licensee shall also maintain a written log of the names and credential numbers of all individuals involved in each such destruction.

(8) A gaming licensee shall ensure that at all times there is adequate security, as approved by the Bureau, for all gaming chips and plaques in its possession.

146.03: Value Gaming Chips

(1) Each gaming chip which contains a denomination on its face shall be known as a "value chip." Value chips shall only be utilized on the gaming floor, unless otherwise authorized by the Bureau.

(a) Each gaming licensee shall be authorized to issue and use value chips in denominations of \$1.00, \$2.50, \$5.00, \$10.00, \$20.00, \$25.00, \$100.00, \$500.00, \$1,000, \$5,000, \$20,000, and \$25,000 and in such quantities as the gaming licensee may deem appropriate to conduct gaming in its gaming establishment.

(b) Each value chip issued by a gaming licensee shall be in the form of a disk. Value chips with a denomination of \$1.00, \$2.50, \$5.00, \$10.00, \$20.00, \$25.00, and \$100.00, shall have a uniform diameter of one and 9/16ths inches. Any value chip issued by a gaming licensee in the denomination of \$500.00 shall have a uniform diameter of one and 9/16ths inches or one and 11/16ths inches. Any value chip issued in the denomination of \$1,000, \$5,000, \$20,000, or \$25,000 shall have a uniform diameter of one and 11/16ths inches.

(c) Each value chip issued in a denomination of \$20,000 or \$25,000, in addition to satisfying the requirements set forth in this section, shall be impressed with a unique serial number.

(d) A gaming licensee may file a petition for Commission approval requesting a different denomination value chip than listed in 205 CMR 146.03(1)(a)-(c).

(2) Each denomination of value chip issued by a gaming licensee shall contain a predominant color unique to that denomination to be known as the "primary color." A "secondary color" on a value chip is any color, other than that chip's primary color, that the Bureau authorizes a gaming licensee to include on the face or edge of the chip as a

contrast to the chip's primary color, except that no primary color shall be used as a secondary color on a value chip of another denomination where such use on the edge is reasonably likely to cause confusion as to the chip's denomination when the edge alone is visible.

(3) Each licensed gaming chip manufacturer shall submit sample color disks to the Bureau that identify all primary and secondary colors to be used for the manufacturing of gaming chips for gaming licensees in Massachusetts. Once a gaming chip manufacturer has received approval from the Bureau for a primary or secondary color, those colors shall be consistently manufactured in accordance with the approved samples. In order for a primary color to be approved for use, it must visually appear, when viewed either in daylight or under incandescent light, to comply with the following colors.

- (a) \$1.00 - "White;"
- (b) \$2.50 - "Pink;"
- (c) \$5.00 - "Red;"
- (d) \$10.00 - "Blue;"
- (e) \$20.00 - "Yellow;"
- (f) \$25.00 - "Green;"
- (g) \$100.00 - "Black;"
- (h) \$500.00 - "Purple;"
- (i) \$1,000 - "Fire Orange;"
- (j) \$5,000 - "Gray;"
- (k) \$20,000 - "Mustard Yellow;" and
- (l) \$25,000 - "Gold."

(4) Each value chip issued by a gaming licensee shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming chip and are applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming chip. These characteristics shall, at a minimum, include:

- (a) The denomination of the value chip, expressed in numbers;
- (b) The name, trade name, or other approved identification of the gaming licensee issuing the value chip, which shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system;
- (c) For each value chip with a denomination below \$25.00 at least one anti-counterfeiting measure and for each value chip with a denomination of \$25.00 or more at least two anti-counterfeiting measures in addition to those items specifically required to appear on the face or edge of a value chip by 205 CMR 146.01 and 146.03(1);
- (d) The word "Massachusetts" if the gaming licensee has gaming properties in other gaming jurisdictions; and
- (e) The primary color of the value chip.

(5) In addition to the characteristics specified in 205 CMR 146.02(4), each value chip in a denomination of \$25.00 or more shall contain a third anti-counterfeiting measure and a design or other identifying characteristic that is unique to the gaming chip manufacturer that makes the chip. Upon approval of a particular design or characteristic by the Bureau, the gaming chip manufacturer shall thereafter be precluded from using that same design or characteristic on any other denomination of value chip that it manufactures. The approved unique design or characteristic may only be changed upon a showing by the gaming chip manufacturer that, despite the change, each value chip in a denomination of \$25.00 or more shall nonetheless be readily identifiable to the manufacturer.

(6) Each value chip issued by a gaming licensee shall contain an identifying characteristic, to be known as an "edge spot," which shall:

(a) Be applied in a manner which ensures that the edge spot shall:

1. Be clearly visible on the edge and, to the extent required by the Bureau, on each face of the value chip; and
2. Remain a permanent part of the value chip.

(b) Be created by using:

1. The primary color of the chip; and
2. One or more secondary colors.

(c) Include a design, pattern or other feature that a person with adequate training could readily use to identify, when viewed through the closed circuit television system of the gaming licensee, the denomination of the particular value chip when placed in a stack of gaming chips, in the table inventory or in any other location where only the edge of the value chip is visible; provided, however, that the design, pattern or feature created by the primary and secondary colors required by 205 CMR 146.03 shall be sufficient by themselves to satisfy the requirements of this paragraph if approved for that purpose by the Bureau.

(7) When determining the secondary colors to be used to make the edge spot on a particular denomination of value chip, a gaming licensee shall, unless otherwise approved by the Bureau, use only those secondary colors that are reasonably likely to differentiate its value chip from the same denomination of value chip issued by any other gaming licensee.

(8) In addition to any other requirement of 205 CMR 146.03, the edge spots on a value chip that has non-identical faces and a denomination of \$25.00 or more shall appear uniform in design, pattern, or other feature when viewed from the perspective of the same face on any other value chip in the set. The edge spots on a value chip that has non-identical faces and a denomination below \$25.00 may appear uniform in design, pattern or other feature or as an inverted mirror image thereof when viewed from the perspective of either face on any other value chip in the set.

(9) Unless otherwise authorized by the Bureau, for each value gaming chip that a gaming licensee elects to issue pursuant to this section whose denomination is greater than

\$10.00, or equal to \$1,000 or \$5,000, it shall also have at least one approved set of gaming chips that may be used as a back-up for the gaming chips in active use. Each set of value chips maintained for use by a gaming licensee shall have different secondary colors. All sets of value gaming chips shall conform to the color and design requirements set forth in 205 CMR 146.03.

(10) A gaming licensee may obtain Bureau approval of two or more different samples within a single set of value chips for a particular denomination with a value of \$100.00 or less ("commingling"), provided that each sample of a particular denomination shall have the same secondary color and edge design. Any approved sample of a particular denomination of value chip within a single set of chips may be placed in or removed from active use by the gaming licensee at any time.

146.04: Non-value Gaming Chips

(1) Each gaming chip which does not contain a denomination on either face thereof shall be known as a "non-value" chip.

(2) Each non-value chip utilized in a gaming establishment shall be issued solely for the purpose of gaming at roulette.

(3) Each non-value chip issued by a gaming licensee shall contain certain identifying characteristics that may appear in any location at least once on each face of the gaming chip and shall be applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming chip. The characteristics required by 205 CMR 146.04 shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system. The identifying characteristics of a non-value chip, at a minimum, shall include:

- (a) The name, trade name, or other identification of the gaming licensee issuing the non-value chip;
- (b) A design, insert, or symbol that will permit a set of non-value chips being used at a particular gaming table to be distinguished from the non-value chips being used at every other gaming table in the gaming establishment;
- (c) The word "Roulette;" and
- (d) Such color and/or design combinations as the Bureau may approve so as to readily distinguish the non-value chips of each player at a particular gaming table from the non-value chips of every other player at the same gaming table and the value chips issued by any gaming licensee.

(4) Each non-value chip issued by a gaming licensee shall contain an identifying characteristic, to be known as an "edge spot," which shall:

- (a) Be applied in a manner which ensures that the edge spot shall:
 1. Be clearly visible on the edge and, to the extent required by the Bureau on each face of the non-value chip; and

2. Remain a permanent part of the non-value chip;
 - (b) Be created by using the colors approved for the face of the particular non-value chip pursuant to 205 CMR 146.04 in combination with one or more other colors that provide a contrast with the color on the face of the chip and that enable it to be distinguished from the non-value chips issued by any other gaming licensee; and
 - (c) Include a design, pattern or other feature approved by the Bureau that a person with adequate training could readily use to identify, when viewing the non-value chip through the closed circuit television system of the gaming licensee, the player to whom the non-value chip has been assigned when the non-value chip is placed in a stack of gaming chips or in any other location where only the edge of the non-value chip is visible; provided, however, that the design, pattern or feature created by the colors required by 205 CMR 146.04 shall be sufficient by itself to satisfy the requirements of this paragraph if approved for that purpose by the Bureau.
- (5) Each gaming licensee shall have a reserve non-value chip for each color utilized in the gaming establishment with a design insert or symbol different from those non-value chips comprising the primary set.

146.05: Non-value Chips; Permitted Uses; Inventory and Impressionment

- (1) Each non-value chip shall be assigned to a particular gaming table and shall be issued and used for gaming at that table only. All non-value chips utilized at a particular gaming table shall have the same design, insert or symbol as required by 205 CMR 146.04. No gaming licensee or any employee thereof shall allow any patron to remove a non-value chip from the gaming table at which it was issued. If a patron removes a non-value chip from the gaming table at which it was issued, the gaming licensee may redeem such chip at the lowest denomination in use at the table.
- (2) No patron at a gaming table shall be issued or permitted to game with non-value chips that are identical in color and design to any non-value chip issued to any other patron at the same table. When a patron purchases non-value chips, a non-value chip of the same color and design shall be placed in a slot or receptacle attached to the outer rim of the roulette wheel or in such other device as approved by the Bureau. At that time, a marker button denoting the value of a stack of 20 non-value chips of the same color and design shall be placed in the slot, receptacle or other device.
- (3) An impressionment of the non-value chips assigned to each gaming table shall be completed at least once every 30 days. The gaming licensee shall record the results of the impressionment in the chip inventory ledger required pursuant to 205 CMR 146.02 and shall perform the impressionment as follows:
 - (a) A gaming department supervisor shall complete a "Non-Value Chip Impressionment" ledger (electronic or manual) to record missing or excess chips and

- shall deliver the ledger and any excess chips to the main bank or chip bank;
- (b) Upon receipt of the "Non-Value Chip Impression" ledger, a main bank cashier or chip bank cashier shall, if appropriate, immediately prepare any chips needed to impress the table; and
- (c) The gaming department supervisor shall then, if applicable, deliver the non-value chips needed to restore the impress to the appropriate gaming table.

- (4) The completed "Non-Value Chip Impression" form shall be maintained by the accounting department and shall contain, at a minimum, the following:
 - (a) The date and time of preparation;
 - (b) The design schematic of the chip including its primary color and the applicable table number;
 - (c) The signature of the gaming department supervisor who completes the "Non-Value Chip Impression" form and the impression for such table; and
 - (d) The signature of the main bank cashier or chip bank cashier who reviewed the form and, if necessary, prepared the chips to restore the impression.
- (5) Each gaming licensee shall record in the chip inventory ledger required by 205 CMR 146.02, a monthly summary of the non-value chip inventory for each gaming table. This monthly summary shall include, at a minimum, the following information for each non-value chip color and design:
 - (a) The balance on hand at the beginning of the month;
 - (b) The number of non-value chips distributed to the gaming table during the month;
 - (c) The number of non-value chips returned to inventory during the month; and
 - (d) The balance on hand at the end of the month.

146.06: Tournament Chips

- (1) If a licensee conducts table game tournaments, the tournaments shall be conducted using tournament chips.
- (2) The identifying characteristics of a tournament chip must include, at a minimum:
 - (a) The name, logo or other approved identification of the licensee issuing the tournament chip;
 - (b) The word "Tournament";
 - (c) The denomination of the chip;
 - (d) The phrase "No Cash Value"; and
 - (e) Color or design combinations so as to readily distinguish the tournament chips from:
 - (i) The Roulette Non-Value chips used for the play of Roulette at the licensed facility.
 - (ii) The value chips issued by any gaming licensee.
 - (iii) Poker room rake chips.

- (3) Tournament chips shall be stored in a secure area approved by the Bureau.
- (4) An inventory of all tournament chips shall be conducted by the licensee prior to the start and after the completion of each tournament.
- (5) Discrepancies in the inventory shall be immediately reported to the casino compliance representatives. The discrepancy report must include the balance for each denomination of tournament chip on hand at the beginning of the tournament and the balance on hand at the end of each tournament.
- (6) Tournament chips shall be assigned only to those tables utilized in a tournament. No casino licensee or any employee thereof shall allow any patron to remove a tournament chip from a tournament.
- (7) Whenever tournament chips are taken from or returned to an approved storage area, at least two employees shall be present, one of whom shall be a supervisor from the casino games or security department or other department approved by the Bureau, and the following information shall be recorded in the tournament chip inventory ledger together with the date and signatures of the employees involved:
 1. The alphabetical designation and, if applicable, any numeric designation;
 2. The number and dollar amount for each denomination of tournament chip removed or returned;
 3. The number and description of the tournament chips removed or returned;
 4. The specific storage area being entered; and
 5. The reason for the entry into the storage area.

146.07: Poker rake chips

- (1) To facilitate the collection of the rake, a licensee may use Poker rake chips in the Poker room.
- (2) Poker rake chips shall only be used by dealers and may only be substituted for value chips that have been collected as part of the rake prior to the rake being placed in the drop box.
- (3) Unused Poker rake chips shall be kept by the dealer in the table inventory container.
- (4) The denominations that may be used for Poker rake chips are \$2, \$3 or \$4.
- (5) The identifying characteristics of a Poker rake chip must include, at a minimum:
 - (a) The name, logo or other approved identification of the licensee;
 - (b) The words "Poker Rake Chip";
 - (c) One of the following denominations: "\$2," "\$3" or "\$4"; and

- (d) Color or design combinations to readily distinguish the Poker rake chips from:
 - (i) The Roulette Non-Value chips used for the play of Roulette at the licensed facility.
 - (ii) The tournament chips used for tournament play at the licensed facility.
 - (iii) The value chips issued by any gaming licensee.

146.08: Gaming Plaques; Issuance and Use; Denominations; Physical Characteristics

- (1) Each gaming plaque issued by a gaming licensee shall be a solid, one-piece object constructed entirely of plastic or other substance approved by the Bureau and shall have no more than six, and at least two, smooth, plane surfaces. At least two of the plane surfaces, each to be known as a "face," shall be opposite and parallel to each other and identical in shape, which shall be a square, rectangle or ellipse. All other surfaces of a gaming plaque shall be known collectively as the "edge."
- (2) No gaming plaque shall be issued by a gaming licensee or utilized in a gaming establishment unless and until:
 - (a) The design specifications of the proposed gaming plaque are, prior to the manufacture of the gaming plaque, submitted to and approved by the Bureau, which submission shall include a detailed schematic depicting the actual size and, as appropriate, location of the following:
 - 1. Each face;
 - 2. The edge; and
 - 3. Any colors, words, designs, graphics or security measures contained on the gaming plaque;
 - (b) A sample gaming plaque, manufactured in accordance with its approved design specifications, is submitted to and approved by the Bureau; and
 - (c) The gaming licensee has submitted to the Bureau internal control procedures which document the distribution, redemption, receipt and inventory of gaming plaques, by serial number, as required by 205 CMR 146.02.
- (3) Each face of a square gaming plaque shall measure no smaller than nine square inches. Each face of a rectangular or elliptical gaming plaque shall measure no smaller than three inches in length by two inches in width. In the case of an elliptical gaming plaque, the length and width of the plaque shall be measured at its axes.
- (4) Each gaming plaque issued by a gaming licensee shall be designed and manufactured with sufficient graphics or other security measures so as to prevent, to the greatest extent possible, the counterfeiting of such gaming plaque.
- (5) Each gaming licensee shall be authorized to issue and use gaming plaques in denominations of \$5,000, \$10,000, \$25,000, \$50,000 and \$100,000, and in such quantities as the gaming licensee may deem proper to conduct gaming in its gaming establishment. Each gaming plaque of a specific denomination utilized by a gaming

licensee shall be in a shape and of a size, as approved by the Bureau, which is identical to the shape and size of all other gaming plaques of that denomination issued by that gaming licensee. The size and shape of each denomination of gaming plaque issued by a gaming licensee shall be readily distinguishable from the size and shape of every other denomination of gaming plaque issued by that gaming licensee.

(6) Each gaming plaque issued by a gaming licensee shall contain certain identifying characteristics which shall appear at least once on each face of the gaming plaque and shall be applied in a manner which ensures that each such characteristic shall be clearly visible and remain a permanent part of the gaming plaque. These characteristics shall, at a minimum, include:

- (a) The denomination of the gaming plaque, expressed in numbers of no less than three-eighths inch in height;
- (b) The name, trade name, or other approved identification of the gaming licensee issuing the gaming plaque, which shall be applied in such a manner so as to be visible to surveillance employees using the closed circuit television system; and
- (c) A unique serial number.

146.09: Exchange and Redemption of Gaming Chips, Plaques and Coupons

(1) All wagering on authorized games, other than slot machines, in a gaming establishment shall be conducted with gaming chips or plaques; provided, however, that coupons shall be permitted for use in wagering at authorized games in accordance with 205 CMR 146.09. A gaming licensee shall submit to the Bureau a sample of its coupons. Value chips previously issued by a gaming licensee which are not in active use by that gaming licensee shall not be used for wagering at authorized table games and shall not be accepted or exchanged for any purpose. Such chips shall only be redeemed at the cashiers' cage pursuant to 205 CMR 146.09(7).

(2) Gaming chips or plaques shall be issued to a patron only at the request of such patron and shall not be given as change in any other but a gaming transaction. Unless otherwise authorized by 205 CMR 146.09, gaming chips and plaques shall be issued only by dealers to gaming patrons at gaming tables. Gaming chips may be issued by chip persons to patrons seated at a poker table at which a game is in progress or by general cashiers. Gaming plaques and value chips shall be redeemed by gaming patrons only at the cashiers' cage; provided, however, that value chips may be:

- (a) Issued to a patron in payment of a manual slot machine jackpot;
- (b) Exchanged by a patron at the slot booths or with change persons for currency, coin or slot tokens to play the slot machines;
- (c) Exchanged for a gaming check upon a patron request to redeem value chips by mail in any amount. The chips shall be redeemed only by a cage supervisor, in accordance with internal controls which, at a minimum, shall detail procedures for the issuance of the gaming check and the transfer of the surrendered value chips

to the chip bank in a transaction fully supported by proper documentation; and
(d) Exchanged by a patron for a pit counter check redemption as permitted by 205 CMR 148.41(1).

(3) Non-value chips shall be presented for redemption only at the gaming table from which they were issued and shall not be redeemed or exchanged at any other location within the gaming establishment. When non-value chips are presented for redemption, the dealer shall accept them in exchange for an equivalent amount of value chips which may then be used by the patron for gaming in the gaming establishment or redeemed in the same manner as any other value chip.

(4) Each gaming licensee may permit, limit or prohibit the use of value chips in gaming at roulette, provided, however, that:

- (a) No person shall be permitted to wager a value chip with a match play coupon at any roulette table at which match play coupons are permitted to be used; and
- (b) When value chips are in use, it shall be the responsibility of the gaming licensee and its employees to keep an accurate account of the wagers being made at roulette with value chips so that the wagers made by one player are not confused with those made by another player at the table.

(5) Each gaming chip and plaque is solely evidence of a debt that the issuing gaming licensee owes to the person legally in possession of the gaming chip or plaque, and shall remain the property of the issuing gaming licensee. Each gaming licensee shall have the right at any time to demand that the person in possession of the gaming chip or plaque surrender the item for redemption.

(6) Each gaming licensee shall redeem promptly its own genuine gaming chips and gaming plaques presented by a patron in person, except when the gaming chips or plaques were obtained or being used unlawfully. A gaming licensee shall redeem its value chips or gaming plaques by accepting them in exchange for an equivalent amount of cash, except that:

- (a) Upon request by a patron who surrenders value chips or gaming plaques in any amount over \$100.00, a gaming licensee shall exchange them for a gaming check of that gaming licensee in the amount of the value chips or gaming plaques surrendered and dated the day of such redemption; and
- (b) A gaming licensee may apply all or any part of the value chips or gaming plaques presented by a patron to the redemption of any Counter Check or Slot Counter Check drawn by the patron, or to the payment of any returned check, provided that the gaming licensee has given that patron prior written notice of such right of setoff and has obtained the patron's written acknowledgment thereof.

(7) Each gaming licensee shall accept, exchange, use or redeem only gaming chips or plaques that it has issued and shall not knowingly accept, exchange, use or redeem gaming chips or plaques, or objects purporting to be gaming chips or plaques, that have

been issued by any other person, except that a gaming licensee may accept and redeem:

- (a) Gaming chips or plaques issued by another legally operated gaming licensee from a patron upon the patron's representation that such chips or plaques had been purchased or received as payment in a gaming transaction from an employee of such licensee working on the premises; or
- (b) Gaming chips issued by any other legally operated gaming licensee from one of its employees who is authorized to receive gratuities, upon the employee's representation that such chips were received as gratuities in the normal course of his or her duties while on the premises of the gaming licensee.

(8) Employees of a gaming licensee who are authorized to receive gaming chips as personal gratuities may redeem the gaming chips at the cashier's cage or at another secure location in the gaming establishment as approved by the Bureau. Gaming chips redeemed by employees at a non-cage employee redemption site shall be exchanged on a daily basis with the cashier's cage in accordance with the gaming licensee's internal control procedures.

(9) Each gaming licensee shall redeem promptly its own genuine value chips and gaming plaques presented to it by any other legally operated gaming licensee upon the representation that such chips and plaques were received or accepted unknowingly, inadvertently or in error or were redeemed in accordance with the provisions of 205 CMR 146.09(8). Each gaming licensee shall submit to the Bureau a system for the exchange, with other legally operated gaming licensees, of value chips and gaming plaques that are in its possession and that have been issued by any other legally operated gaming licensee, or that it has issued and that are presented to it for redemption by any other legally operated gaming licensee.

(10) Each gaming licensee shall cause to be posted and remain posted in a prominent place on the front of the cashiers' cage and any satellite cage a sign that reads as follows: "By law, gaming chips or plaques issued by another gaming licensee may not be exchanged or redeemed in this gaming establishment."

146.10: Roulette Wheel and Table; Physical Characteristics; Double Zero Roulette Wheel Used as a Single Roulette Wheel

(1) Roulette shall be played on a table having a roulette wheel of not less than 30 inches in diameter at one end of the table and a roulette layout imprinted on the opposite end of the table. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) Each roulette wheel shall be of a single zero variety or a double zero variety.

- (a) Each single zero roulette wheel shall have 37 equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel

shall also have a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1 to 36 and colored alternately red and black. Unless otherwise approved by the Bureau, the numbers shall be arranged clockwise around the wheel in the following order: 0, 32, 15, 19, 4, 21, 2, 25, 17, 34, 6, 27, 13, 36, 11, 30, 8, 23, 10, 5, 24, 16, 33, 1, 20, 14, 31, 9, 22, 18, 29, 7, 28, 12, 35, 3, and 26. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(b) Each double zero roulette wheel shall have 38 equally spaced compartments around the wheel where the roulette ball shall come to rest. The roulette wheel shall also have a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero (00) and colored green, and the others marked 1 to 36 and colored alternately red and black. Unless otherwise approved by the Bureau, the numbers shall be arranged clockwise around the wheel in the following order: 0, 28, 9, 26, 30, 11, 7, 20, 32, 17, 5, 22, 34, 15, 3, 24, 36, 13, 1, 00, 27, 10, 25, 29, 12, 8, 19, 31, 18, 6, 21, 33, 16, 4, 23, 35, 14, and 2. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(c) If a gaming licensee offers the optional six numbers color wager authorized by Section 1 of the authorized Rules of the Game of Roulette:

1. The areas on the ring of a single zero roulette wheel shall have one marked zero (0) and colored green, and the others marked in the order specified in 205 CMR 146.10(2)(b), but colored as follows: purple - 4, 21, 2, 25, 17, 34; green - 6, 27, 13, 36, 11, 30; black - 8, 23, 10, 5, 24, 16; blue - 33, 1, 20, 14, 31, 9; gold - 22, 18, 29, 7, 28, 12; and red - 35, 3, 26, 32, 15, 19. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color as approved by the Bureau.

2. The areas on the ring of a double zero roulette wheel shall have one marked zero (0) and colored green, one marked double-zero (00) and colored green, and the others marked in the order specified in 205 CMR 146.10(2)(c)(1), but colored as follows: blue - 30, 11, 7, 20, 32, 17; gold - 5, 22, 34, 15, 3, 24; red - 36, 13, 1, 27, 10, 25; purple - 29, 12, 8, 19, 31, 18; green - 6, 21, 33, 16, 4, 23; and black - 35, 14, 2, 28, 9, 26. The color of each compartment shall either be a corresponding color to those depicted on the ring or a neutral color.

(3) A double zero roulette wheel may be used as a single zero roulette wheel, provided that:

- (a) The "00" wager area on the layout is obscured with a cover or other approved device which clearly indicates that such a wager is not available; and
- (b) Appropriate signage is posted at the roulette table to notify players that:

1. A double zero roulette wheel is being used as a single zero roulette wheel, and that double zero (00) is not an available wager;
 2. If the roulette ball comes to rest in a compartment marked double zero (00), the spin will be declared void and the wheel will be spun again; and
 3. Wagers on red, black, odd, even, 1 to 18 and 19 to 36 shall be lost if the roulette ball comes to rest in a compartment marked zero (0).
- (4) The layout for a roulette table shall contain, at a minimum:
- (a) The name or trade name of the gaming licensee offering the game; and
 - (b) Specific areas for the placement of the wagers authorized by Section 1 of the authorized Rules of the Game of Roulette.
- (5) If a gaming licensee offers an optional wager authorized by Section 1 of the authorized Rules of the Game of Roulette, the layout for that roulette table shall also include designated areas for the placement of such wagers.
- (6) Each roulette table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.11: Roulette Balls

Balls used in gaming at roulette shall be made completely of a non-metallic material and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved by the Bureau.

146.12: Roulette; Inspection Procedures; Security Procedures

- (1) Prior to opening a roulette table for gaming activity, a casino supervisor or member of the security department shall:
- (a) Inspect the roulette table and roulette wheel for any magnet or contrivance that would affect the fair operation of such wheel;
 - (b) Inspect the roulette wheel to assure that it is level and rotating freely and evenly;
 - (c) Inspect the roulette wheel to assure that all parts are secure and free from movement;
 - (d) Inspect the roulette ball by passing it over a magnet or compass to assure its non-magnetic quality; and
 - (e) Confirm that the layout and signage comply with 205 CMR 146.10(3), if a double zero roulette wheel is being used as a single zero roulette wheel.
- (2) If a gaming licensee uses a roulette wheel which has external movable parts, any adjustments to the movable parts shall be made by a gaming establishment supervisor or a member of the gaming establishment maintenance department, in the presence of a security department member. Adjustments to the movable parts of a roulette wheel that

is located on the gaming floor shall only be made when the roulette table is not open to the public or if the roulette wheel is moved to a secure location outside the gaming establishment as approved by the Bureau.

(3) All adjustments shall be completed prior to the inspections required pursuant to 205 CMR 146.12(1).

(4) The gaming licensee may replace any of the movable parts at any time, provided, however, if any one or more of the movable parts are external then an inspection must be completed in accordance with 205 CMR 146.12(1) and notification of what was replaced provided to the Bureau, prior to reopening the roulette wheel and table for gaming activity.

(5) A log of adjustments shall be maintained which shall include, at a minimum, the date, the roulette table number, whether an adjustment or replacement was completed and the signature of the person making the adjustment or replacement.

(6) When a roulette table is not open for gaming activity, the roulette wheel shall be secured by placing a cover over the entire wheel and securely locking such cover to the roulette table.

146.13: Blackjack Table; Card Reader Device; Physical Characteristics; Inspections

(1) Blackjack shall be played at a table having on one side places for the players and on the opposite side a place for the dealer. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a blackjack table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game; and
- (b) Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number, with the exception of the 6 to 5 blackjack variation, which shall contain no more than six betting areas.

(3) The following inscriptions shall appear on the blackjack layout:

- (a) Blackjack pays 3 to 2;
- (b) Dealer must draw to 16 and stand on all 17s; and
- (c) Insurance pays 2 to 1.

(4) If a gaming licensee offers blackjack rule variations, the blackjack layout shall have imprinted on it, at a minimum, the following inscriptions instead of the inscriptions set forth in 205 CMR 146.13(3):

- (a) Blackjack pays 1 to 1;
- (b) Dealer must draw to 16 and stand on all 17s; and
- (c) Dealer's hole card dealt face up.

- (5) Each blackjack table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table, but on opposite sides of the dealer, as previously approved by the Bureau.
- (6) If a gaming licensee offers one of the additional wagers authorized by Section 17 of the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the additional wager and shall have the payout odds for the additional wager imprinted on the layout or a separate sign located at the table containing the payout odds for the additional wager.
- (7) A blackjack table may have attached to it an approved card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack in accordance with Section 6 of the authorized Rules of the Game for Blackjack. If a blackjack table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day to insure that there has been no tampering with the device and that it is in proper working order. A card reader device may not be used on a blackjack table offering a progressive blackjack wager pursuant to Section 19 of the authorized Rules of the Game of Blackjack.
- (8) Notwithstanding the requirements of 205 CMR 146.13(2), if a gaming licensee offers multiple action blackjack in accordance with the requirements of Section 18 of the authorized Rules of the Game of Blackjack, the blackjack layout shall contain, at a minimum:
- (a) Three separate designated betting areas for each player position at the table with each separate betting area being numbered one through three, provided, however, that the number of player positions at each table shall not exceed six;
 - (b) A separate designated area on the layout for each player position for the placement of insurance wagers;
 - (c) A separate designated area on the layout for each player position for the placement of double down wagers;
 - (d) A separate designated area on the layout for each player position for the placement of split pair wagers; and
 - (e) Three separate areas designated for the placement of the dealer's original face up card with each separate area being numbered one through three.
- (9) In order to collect the cards at the conclusion of a round of play as required by Section 6 of the authorized Rules of the Game of Blackjack and at such other times as provided in 205 CMR 146.49, each blackjack table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used to play the game at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark

on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used to play the game at that table. Whenever a double shoe is used at a blackjack table, the same number of decks shall be used in each side of the double shoe, and the height and marking requirements for that table's discard rack shall be determined from the number of decks used in one side of the shoe.

(10) If a gaming licensee offers a progressive blackjack wager pursuant to Section 19 of the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the progressive blackjack wager and shall contain the following equipment:

- (a) A separate acceptor device for the placement of a progressive wager. Each acceptor device shall have a light which shall illuminate upon placement and acceptance of a gaming chip;
- (b) A method to ensure that only one progressive blackjack wager is made per person, per round of play;
- (c) A device or method to indicate that a progressive blackjack wager has been won;
- (d) A sign describing the winning wagers and the payouts to be awarded on winning progressive blackjack wagers at a location near the table;
- (e) A table controller panel which shall be equipped with a "lock-out" button which, once activated by the dealer, will prevent any player's gaming chip from being recognized in the acceptor device; and
- (f) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor devices to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the Bureau may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

(11) If a gaming licensee offers a blackjack bonus wager pursuant to Section 20 of the authorized Rules of the Game of Blackjack, the blackjack layout shall have designated areas for the placement of the blackjack bonus wager, and shall contain the following equipment:

- (a) A table controller located in an area of the table or the pit which area shall be secured by dual locking mechanisms, which are unique from one another. One locking mechanism shall be maintained and controlled by a gaming establishment security supervisor, and the second locking mechanism shall be maintained and controlled by a gaming establishment supervisor;
 - 1. One table controller shall control no more than four blackjack tables. Procedures for the operation, security and control of the table controller shall be submitted to the Bureau prior to implementation;
 - 2. Whenever it is required that a table controller or any device connected thereto which may affect the operation of the blackjack bonus system be

accessed or opened, certain information shall be recorded on a form entitled "Controller Access Authorization Log," which shall include, at a minimum, the date, time, purpose of accessing or opening the controller or device, and the signature of the authorized employee accessing or opening the machine or device. The Controller Access Authorization Log shall be maintained in the same secured location as the table controller, and shall have recorded thereon a sequential number and the manufacturer's serial number or the asset number of the controller;

- (b) A blackjack bonus button, which shall be located at the table by the dealer, and used by each player with a winning blackjack bonus wager to generate a bonus amount to be won by that player. The blackjack bonus button shall be attached to the table in a manner that will enable the dealer to place the blackjack bonus button directly in front of each winning player;
- (c) A blackjack bonus display, which shall be located at the table and shall display the amount of the winning blackjack bonus on both sides of the device, so that the amount is visible to all players, the dealer and supervisory personnel; and
- (d) A sign containing the amount of the blackjack bonus wager, as well as the minimum and maximum possible blackjack bonus amounts to be awarded, pursuant to 205 CMR 147.03.

(12) If a gaming licensee offers a streak wager pursuant to Section 22 of the authorized Rules of the Game of Blackjack, the blackjack table shall also contain:

- (a) A layout which shall include, at a minimum:
 - 1. Four additional separate designated betting areas for each of the player positions at the table, which areas shall be numbered "2" through "5"; and
 - 2. The inscriptions "Two consecutive wins pays 3 to 1," "Three consecutive wins pays 7 to 1," "Four consecutive wins pays 17 to 1," and "Five consecutive wins pays 37 to 1"; and
- (b) The following equipment:
 - 1. Marker buttons ("lammers") with the gaming licensee's name or logo, to indicate how many consecutive blackjack hands a patron has won or another device or method approved by the Bureau; and
 - 2. A sign containing the permissible amount of the streak wager, posted pursuant to 205 CMR 147.03.

(13) If a gaming licensee offers a match-the-dealer wager pursuant to Section 23 of the authorized Rules of the Game of Blackjack, the blackjack table shall contain:

- (a) A layout which shall include, at a minimum, an additional designated betting area bearing the inscription "Match-the-Dealer" at each of the player positions at the table; and
- (b) A sign approved by the Bureau setting forth the payout odds for the match-the-dealer wager.

(14) If a gaming licensee offers the 6 to 5 blackjack variation:

(a) The layout shall have imprinted on it, at a minimum, the following inscriptions:

1. Blackjack pays 6 to 5;
2. Dealer must draw to 16 and soft 17; and
3. Insurance pays 2 to 1; and

(b) A notice shall be posted in accordance with 205 CMR 147.03 indicating that all wagers shall be made in increments of \$5.00 as required by Section 3 of the authorized Rules of the Game of Blackjack.

(15) If a gaming licensee offers the twenty point bonus wager pursuant to Section 24 of the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall also include, at a minimum, an additional designated betting area for the twenty point bonus wager at each of the player positions at the table. The blackjack table shall also contain a sign setting forth the payout odds for the twenty point bonus wager.

(16) If a gaming licensee offers the option set forth in Section 12 of the authorized Rules of the Game of Blackjack that requires the dealer to draw additional cards on a soft 17, the blackjack layout shall have imprinted on it, at a minimum, the following inscription instead of the inscription set forth in 205 CMR 146.13(3)(b):

“Dealer must draw to 16 and soft 17 and stand on hard 17’s and all 18’s.”

(17) If a gaming licensee offers the optional bonus wager pursuant to Section 25 of the authorized Rules of the Game of Blackjack, the layout otherwise required by this section shall include, at a minimum, an additional designated betting area for such wager at each of the player positions at the table. In addition, payout odds for the optional bonus wager shall be inscribed on the layout or posted on a sign at each such blackjack table.

(18) If a gaming licensee requires a hand fee, the approved layout otherwise required by this section shall include, at a minimum, an additional designated area at each player position for the placement of the hand fee.

146.14: Three-card Poker Table; Physical Characteristics

(1) Three-card poker shall be played at a table having betting positions for the players on one side of the table and a place for the dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table.

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a three-card poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) A separate designated betting area at each betting position for the placement of "ante" wagers;

- (c) A separate designated betting area located immediately in front of each ante wager betting area for the placement of "play" wagers;
- (d) A separate designated betting area located immediately behind each ante wager betting area for the placement of "pair plus" wagers;
- (e) If the gaming licensee offers the six card bonus wager authorized by the authorized Rules of the Game of Three Card Poker, a separate designated betting area at each betting position for the placement of a six card bonus wager; and
- (f) Inscriptions that advise patrons, in accordance with the authorized Rules of the Game of Three Card Poker, of the payout odds for ante and play wagers, pair plus wagers, six card bonus wagers and ante bonuses and that "Dealer Plays with Queen High or Better."

(3) Each three-card poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.15: Spanish 21 Table; Physical Characteristics

(1) Spanish 21 shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Spanish 21 table shall have imprinted thereon, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) A separate designated betting area at each betting position for the placement of the following wagers:

- 1. The required Spanish 21 wager; and
- 2. An optional match-the-dealer wager;

(c) The following inscriptions:

- 1. "Blackjack Pays 3 to 2";
- 2. "Dealer Must Draw to 16 and Stand on All 17's;"
- 3. "Insurance Pays 2 to 1";

(d) The payout odds for each of the wagers listed in Section 5 of the authorized Rules of the Game of Spanish 21; and

(e) The payout odds for the match-the-dealer wager, unless the odds are included in the sign required by 205 CMR 146.15(3).

(3) A gaming licensee shall post a sign at each Spanish 21 table, which explains:

(a) That doubled down hands and split hands are not eligible for the additional payouts in Section 5 of the authorized Rules of the Game of Spanish 21; and

(b) The payout odds for the match-the-dealer wager, if those payout odds are not imprinted on the layout.

(4) Each Spanish 21 table shall have a drop box and a tip box attached to it on the same

side of the gaming table as, but on opposite sides of, the dealer.

(5) In order to collect the cards at the conclusion of a round of play as required by Section 7 of the authorized Rules of the Game of Spanish 21 and at such other times as provided in 205 CMR 146.49, each Spanish 21 table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided, however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

(6) A Spanish 21 table may have attached to it, as approved by the Bureau, a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack in accordance Section 1 of the authorized Rules of the Game of Spanish 21. If a Spanish 21 table has an approved card reader device attached to it, the floorperson assigned to the table shall inspect the card reader device at the beginning of each gaming day. The purpose of this inspection shall be to insure that there has been no tampering with the device and that it is in proper working order.

146.16: Blackjack Switch Table; Physical Characteristics

(1) Blackjack switch shall be played at a table having betting positions for no more than five players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a blackjack switch table shall have imprinted thereon, at a minimum, the following:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) Two adjacent designated betting areas at each betting position for the placement of the required two initial blackjack switch wagers;
- (c) A separate designated area on the layout at each betting position for the placement of the optional match wager;
- (d) The following inscriptions, unless they are included on the sign required by 205 CMR 146.16(3):

1. "Blackjack pays 1 to 1";
2. "Insurance pays 2 to 1";
3. "Dealer must hit a soft 17"; and
4. "Dealer pushes on 22"; and

(e) The payout odds for the optional match wager, unless they are included on the sign required by 205 CMR 146.16(3).

(3) A gaming licensee shall post a sign at each blackjack switch table, which shall include:

- (a) A statement that, if more than one match occurs in a player's initial four cards, the match wager will only be paid once, using the highest payoff that occurs within those cards; and
- (b) The payout odds for the optional match wager, if they are not imprinted on the layout.

(4) Each blackjack switch table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(5) In order to collect the cards at the conclusion of a round of play as required by 205 CMR 147.6(i), each blackjack switch table shall have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack shall equal the height of the cards, stacked one on top of the other, contained in the total number of decks that are to be used in the dealing shoe at that table; provided however, that a taller discard rack may be used if such rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards contained in the number of decks to be used in the dealing shoe at that table.

(6) A blackjack switch table may have attached to it a card reader device which permits the dealer to read his or her hole card in order to determine if the dealer has a blackjack. If a blackjack switch table has an approved card reader device attached to it, such device shall be inspected at the beginning of each gaming day, to insure that there has been no tampering with the device and that it is in proper working order.

146.17: Craps and Mini-craps Tables; Physical Characteristics

(1) Craps and mini-craps shall be played on an oblong table with rounded corners and high walled sides. A craps table shall not be larger than 14 feet in length. A mini-craps table shall be no longer than 9 1/2 feet in length, and shall have seating locations for a maximum of nine players.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a craps or mini-craps table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) Specific areas designated for the placement of wagers as authorized by Section 2 of the authorized Rules of the Game of Craps and Mini Craps; and
- (c) The words "No call bets."

(3) Each craps and mini-craps table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(4) In addition to the requirements of 205 CMR 146.17(2), if the fire bet in the game of craps is offered by a gaming licensee, the craps table shall include, at a minimum:

- (a) No more than 16 designated areas for the placement of fire bets, which areas shall be located around the perimeter of the layout, correspond to player positions at the table, and be sequentially numbered in a clockwise direction, with the area numbered “1” being located immediately to the left of the game personnel;
- (b) A designated area of the layout for the relocation and identification of all fire bets placed by players prior to the come out roll of a shooter, which area shall be located in front of the boxperson and contain numbered areas which correspond to the location of the numbered areas described in 205 CMR 146.17(4)(a); and
- (c) The following information on the inside wall of the table, which information shall be visible to all player positions:
 - 1. The payout odds for four, five and six different (unique) points made;
 - 2. That fire bets shall only be accepted prior to a shooter’s initial come out roll; and
 - 3. The wager limitations applicable to the fire bet.

146.18: Baccarat, Midi-baccarat Mini-baccarat, and Baccarat-Chemin de Fer Tables; Physical Characteristics

- (1) Baccarat shall be played on a table having numbered places for 10 to 14 seated players.
- (2) Baccarat-chemin de fer shall be played on a table having numbered places for nine to 14 seated players.
- (3) Mini-baccarat shall be played at a table having on one side places for a maximum of nine seated players, and on the opposite side a place for the dealer; provided however, that unless the cards are changed after each shoe, a mini-baccarat table using the dealing procedure in the authorized Rules of the Game of Minibaccarat shall have places for a maximum of six seated players. The dimensions of a mini-baccarat table shall be submitted to the Bureau.
- (4) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a baccarat, midi-baccarat, mini-baccarat, or baccarat-chemin de fer table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game;
 - (b) For baccarat, midi-baccarat and mini-baccarat layouts, specific areas designated for the placement of wagers on the "Banker's Hand," "Players Hand," and "Tie Hand;”
 - (c) For baccarat-chemin de fer layouts, specific areas for the placement of the wagers authorized by the authorized Rules of the Game of Baccarat – Chemin de Fer;
 - (d) For baccarat, midi-baccarat and mini-baccarat layouts, the phrase “Tie Bets pay 8 to 1;”

- (e) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish; provided, however, that the numbered areas are not required if:
 - 1. For baccarat, the gaming licensee offers a no vigorish variation of the game in accordance with the authorized Rules of the Game of Baccarat;
 - 2. For mini-baccarat, the gaming licensee only charges vigorish in accordance with the provisions of the authorized Rules of the Game of Minibaccarat or offers a no vigorish variation of the game in accordance with the provisions of the authorized Rules of the Game of Minibaccarat;
- (f) An area designated for the placement of cards for the "Player's" and "Banker's" hands;
- (g) If a gaming licensee offers the optional total card wagers in the games of baccarat, midi-baccarat and mini-baccarat:
 - 1. Three specific areas at each player position designated for the placement of total card wagers on a total of four cards, five cards and six cards, and identified with the numerals "4," "5," and "6," respectively, which areas shall be located between the areas designated for the placement of wagers on a "Tie Hand" and the "Banker's Hand"; and
 - 2. An inscription on the layout indicating the payout odds for all total card wagers;
- (h) If a gaming licensee offers the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Minibaccarat:
 - 1. Two separate areas at each betting position designated for the placement of the optional bonus wager which shall be located, from the player's perspective, immediately to the right of the areas designated for the placement of wagers on the "Banker's Hand" and "Player's Hand"; and
 - 2. An inscription identifying the payout odds for the optional bonus wager unless the gaming licensee chooses to comply with 205 CMR 146.18(7)-(9); and
- (i) If a gaming licensee offers the no vigorish variation of baccarat, midi-baccarat or mini-baccarat pursuant to the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively:
 - 1. An area at each player position designated for placement of the "dragon 7" wager and inscribed with "dragon 7," which area shall be located on the right side of the area designated for the placement of a "Tie Hand" wager when viewed by the player; and
 - 2. An inscription identifying the payout odds for the dragon 7 wager unless the gaming licensee chooses to comply with 205 CMR 146.18(8).

(5) If marker buttons are used for the purpose of marking vigorish, these marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing marker buttons and such rack shall be placed in front of the table inventory float container during gaming activity.

(6) Each baccarat and mini-baccarat table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(7) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Minibaccarat listing the payout odds for the optional bonus wager.

(8) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the dragon 7 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the dragon 7 wager.

(9) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)(2), a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the panda 8 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat-Midi Baccarat, or Minibaccarat, respectively, indicating the payout odds for the panda 8 wager.

146.19: Big Six Wheel and Layout; Physical Characteristics

(1) Gaming at Big Six shall be conducted at a wheel circular in shape and no less than five feet in diameter. The rim of the wheel shall be divided into 54 equally spaced sections with 23 sections containing a \$1.00 bill, 15 sections containing a \$2.00 bill, eight sections containing a \$5.00 bill, four sections containing a \$10.00 bill, two sections containing a \$20.00 bill, one section containing a picture of a flag or the name or logo of the gaming licensee, and one section containing a picture of a joker, each of which sections shall be covered with transparent protective cover.

(2) The sections required by 205 CMR 146.19(1) shall be arranged clockwise around the rim of the wheel in the following order: joker, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$5, \$1, \$2, \$1, \$20, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$2, \$5, \$1, \$2, \$1, flag, \$2, \$5, \$2, \$1, \$2, \$1, \$10, \$1, \$5, \$1, \$2, \$1, \$20, \$1, \$2, \$1, \$5, \$2, \$1, \$10, \$1, \$2, \$5, \$1, \$2, and \$1.

(3) Each section of the Big Six Wheel shall also display the payout odds for the wager contained therein, pursuant to the authorized Rules of the Game of Big Six Wheel.

(4) Each Big Six Wheel table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

(5) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Big Six Wheel table

shall have imprinted thereon, at a minimum:

- (a) The name or trade name of the Gaming licensee offering the game;
- (b) Spaces which shall be used by patrons to place their wagers, and which shall contain:
 - 1. Depictions of a \$1.00 bill, \$2.00 bill, \$5.00 bill, \$10.00 bill, and \$20.00 bill, or numbers representing those monetary denominations;
 - 2. A flag or the name or logo of the gaming licensee, as it appears on the Big Six Wheel; and
 - 3. A joker; and
- (c) The payout odds for each of the permitted wagers.

146.20: Sic Bo Table; Sic Bo Shaker; Physical Characteristics

- (1) Each sic bo table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (2) Each sic bo table shall have an electrical device which, when the numeric value of each die has been entered, shall cause the winning combinations to be illuminated. The sic bo table shall have an area, which depicts all permissible wagers pursuant to the authorized Rules of the Game of Sic Bo. Each combination shall have the capability to be illuminated, if it is a winning combination, after the numeric value of each die has been entered into the electrical device by the dealer.
- (3) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a sic bo table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee; and
 - (b) Specific areas designated for the placement of the wagers authorized by the authorized Rules of the Game of Sic Bo; and
 - (c) The payout odds currently being offered in accordance with the authorized Rules of the Game of Sic Bo.
- (4) Sic bo shall be played with a sealed container, to be known as a "sic bo shaker," which shall be used to shake the dice in order to arrive at the winning combinations.
 - (a) A manual sic bo shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
 - 1. The sic bo shaker shall have a compartment to secure the three dice required by the authorized Rules of the Game of Sic Bo and a separate cover which conceals the dice while the dealer is shaking the sic bo shaker. The compartment to secure the three dice shall be transparent and the cover which conceals the dice shall be opaque;
 - 2. The sic bo shaker shall have the capability of being sealed or locked in order to ensure the integrity of the dice contained therein;

3. The sic bo shaker shall have the name or trade name of the gaming licensee or identifying logo imprinted or impressed thereon; and
 4. The sic bo shaker shall be secured to the sic bo table when the table is open for gaming activity.
- (b) An automated sic bo shaker may be used in the game of sic bo, provided that:
1. The shaker meets the requirements of 205 CMR 146.20(4)(a), except that a separate opaque cover shall not be used; and
 2. The shaker, its location on the sic bo table and the procedures for shaking the dice are submitted to the Bureau.

146.21: Pai Gow Poker Table; Pai Gow Poker Shaker; Physical Characteristics; Computerized Random Number Generator

- (1) Pai gow poker shall be played at a table having on one side places for the players and on the opposite side a place for the dealer.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow poker table shall contain, at a minimum:
 - (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) Two separate areas located below each betting area which shall be designated for the placement of the high and second highest or low hands of that player;
 - (c) If a gaming licensee offers the optional bonus wager and/or insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker:
 1. A separate area for each player, located to the right of the numbered betting areas, designated for the placement of a bonus wager by each player;
 2. A separate area for each player, located to the left of the numbered betting areas, designated for the placement of an insurance wager by each player;
 3. Notice of signage for payout odds for the bonus wager and insurance wager and payout amounts for the "envy bonus" as defined at the authorized Rules of the Game of Pai Gow Poker; and
 4. The inscription indicating the payout limit per round of play for the bonus wager and the insurance wager established by the gaming licensee pursuant to the authorized Rules of the Game of Pai Gow Poker or a generic inscription indicating the wagers are subject to the posted payout limit;
 - (d) If the gaming licensee offers the additional wager authorized by the authorized Rules of the Game of Pai Gow Poker, a separate area for each player, designated for the placement of that additional wager by each player, as well as the payout odds for the additional wager;

- (e) Two separate areas designated for the placement of the high and second highest or low hands of the dealer;
 - (f) The name or trade name of the gaming licensee offering the game;
 - (g) If the gaming licensee offers the optional bonus wagers authorized by the authorized Rules of the Game of Pai Gow Poker, separate areas for each player, designated for the placement of the three-card bonus wager and seven-card bonus wager; and
 - (h) If the gaming licensee offers the imperial pai gow bonus wager authorized by the authorized Rules of the Game of Pai Gow Poker:
 - 1. A separate area for each player, located to the right of the area for the placement of a player's pai gow wager, designated for the placement of the imperial pai gow bonus wager; and
 - 2. An inscription or notice of signage, as approved by the Bureau, for payout odds for both the "player hand bonus" and "banker hand bonus" as defined in the authorized Rules of the Game of Pai Gow Poker.
- (3) If a gaming licensee offers the optional bonus wager and/or the insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker, a sign shall be posted at each pai gow poker table offering any of these wagers that explains the following:
- (a) For the optional bonus wager and the insurance wager authorized by the authorized Rules of the Game of Pai Gow Poker, the details of the payout limit established pursuant to the authorized Rules of the Game of Pai Gow Poker and, if a generic inscription is used pursuant to 205 CMR 146.21, established payout limit; or
 - (b) For the optional wagers authorized by the authorized Rules of the Game of Pai Gow Poker, the payout odds for each bonus wager.
- (4) Each pai gow poker table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (5) Pursuant to the authorized Rules of the Game of Pai Gow Poker, pai gow poker may be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
- (a) The pai gow poker shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The pai gow poker shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (6) As an alternative to using the shaker and dice described in 205 CMR 146.21(5) a gaming licensee may, unless the gaming licensee offers the optional bonus wagers

authorized by the authorized Rules of the Game of Pai Gow Poker, determine the starting position for the dealing or delivery of the cards in pai gow poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

(7) If a gaming licensee offers a progressive payout wager pursuant to 205 CMR 138.62, the pai gow poker table shall include the following features:

- (a) A separate acceptor device mounted for the placement of the progressive wager, which acceptor device shall have a light that illuminates upon the insertion and acceptance of a gaming chip;
- (b) A sign describing each winning progressive payout wager and the payout to be awarded therefore;
- (c) A table controller panel located in an area of the table as approved by the Bureau and which shall be equipped with a "lock-out" button that, once activated by the dealer as set forth in 205 CMR 138.62, shall prevent any player from depositing a gaming chip in the acceptor device; and
- (d) A mechanical, electrical or electronic table inventory return device which shall permit all gaming chips deposited into the acceptor device referenced in 205 CMR 146.13(7)(a) to be collected and immediately returned to a designated area within the table inventory container prior to the dealing of a hand. The table inventory return device shall be designed and constructed to contain any feature the may require to maintain the security and integrity of the game. The procedures for the operation of all functions of the table inventory return device shall be submitted to the Bureau.

(8) If a gaming licensee offers the dragon's eye variation of pai gow poker pursuant to the authorized Rules of the Game of Pai Gow Poker, in addition to the requirements set forth in 205 CMR 146.21, the layout shall include six separate betting areas at each player position for the placement of the following six optional wagers:

- (a) An even wager;
- (b) An odd wager;
- (c) A match wager;
- (d) A double wager;
- (e) A triple wager; and
- (f) A dice bonus wager.

(9) If a gaming licensee offers the "dealer queen's dragon" wager, "dynasty bonus" wager, "protection" wager, and the "red/black" wager authorized by the authorized Rules of the Game of Pai Gow Poker then the following shall apply:

- (a) A separate area for each player, located above the numbered betting areas, designated "queen's dragon" for the placement of the "dealer queen's dragon" wager.

- (b) A separate area for each player, located to the right of the numbered betting areas, designated "dynasty bonus" for the placement of the "dynasty bonus" wager.
- (c) A separate area for each player, located to the left of the numbered betting areas, designated "P" for the placement of the "protection" wager.
- (d) Two separate areas for each player, one located to the right of the "queen's dragon" betting area and colored red and the other located to the left of the "queen's dragon" betting area and colored black, for the placement of the "red/black" wager.
- (e) Notice of signage, as approved by the Bureau, providing the payout odds for the "dealer queen's dragon" wager, "dynasty bonus" wager, "protection" wager, "red/black" wager, and payout amounts for the "envy bonus" as defined in the authorized Rules of the Game of Pai Gow Poker.
- (f) Inscriptions indicating the aggregate payout limit per round of play for the "dealer queen's dragon" wager, the "dynasty bonus" wager, the "protection" wager, and the "red/black" wager established by the gaming licensee pursuant to the authorized Rules of the Game of Pai Gow Poker a generic inscription indicating the wagers are subject to the posted payout limit.

146.22: Pai Gow Table; Pai Gow Shaker; Physical Characteristics

- (1) Pai gow shall be played at a table having on one side places for the players and on the opposite side a place for the dealer.
- (2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a pai gow table shall contain, at a minimum:
 - (a) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (b) A separate area, located to the left of the dealer, for the placement of four tiles which shall be referred to as the "dead hand"; and
 - (c) The name or trade name of the gaming licensee offering the game.
- (3) Each pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (4) Pai gow shall be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of pai gow is dealt in order to determine the starting position for the dealing of the pai gow tiles. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:

- (a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
- (b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.

(5) If a gaming licensee offers the dragon's eye variation of pai gow pursuant to the authorized Rules of the Game of Pai Gow, in addition to the requirements set forth in 205 CMR 146.22 the layout shall include:

- (a) Five separate betting areas at each player position for the placement of the following five optional wagers:
 - 1. An even wager;
 - 2. An odd wager;
 - 3. A match wager;
 - 4. A double wager; and
 - 5. A triple wager; and
- (b) A separate location to the left of dealer's table inventory container with six areas for the dealer's placement of player dice bonus wagers, which areas are designated with the numeric player position at the table.

146.23 RESERVED

146.24: Poker Table; Physical Characteristics

- (1) Poker shall be played on a table which is oval in shape and which has places for up to 11 players and a dealer. Each poker table shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game; and
 - (b) A designated holding area located to the right of the dealer for the collection of the rake prior to final placement of the rake in the table inventory container.
- (3) Each poker table shall have a designated area for the placement of at least one deck of cards. This area may be part of the table inventory container.
- (4) Each poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer, in locations approved by the Bureau.

(5) If a gaming licensee offers a bad beat payout at a designated poker table, a transparent locked box or container shall be attached to the table on the same side as the drop box and shall be used to hold the pot contributions that fund the bad beat payout.

146.25: Double Down Stud Table; Physical Characteristics

(1) Double down stud shall be played on a table having seven places on one side for the players, and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a double down stud table contain, at a minimum:

- (a) The name or trade name of the gaming licensee offering the game;
- (b) Seven separate designated betting areas for the placement of wagers by the players;
- (c) A separate designated area located below each betting area for the placement of double down wagers; and
- (d) A separate designated area located directly in front of the table inventory container for the placement of the dealer's common cards.

(3) The following inscription shall be conspicuously printed on each double down stud layout: "Payout Limit of \$100,000 Per Hand." A gaming licensee shall post a sign at each double down stud table explaining the details and the ramifications of this payout limit.

(4) Each double down stud table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.26: Caribbean Stud Poker Table; Physical Characteristics

(1) Caribbean stud poker shall be played on a table having betting positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a Caribbean stud poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) A separate designated betting area at each betting position for the placement of "ante" wagers;
- (c) A separate designated betting area located immediately behind each ante betting area for the placement of "bet" wagers; and
- (d) The inscriptions "Payout Limit of \$5,000 per Hand on Bet Wagers" and "Bet Wager Void Unless Dealer has Ace/King or Better."

(3) A sign shall be posted at each Caribbean stud poker table that explains the details of the \$5,000 payout limit authorized by Section 12 of the authorized Rules of the Game of Caribbean Stud Poker.

(4) Each Caribbean stud poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

(5) Each Caribbean stud poker table shall also have an approved table game progressive payout wager system for the placement of progressive wagers. A table game progressive payout wager system shall include, without limitation:

- (a) A wagering device at each betting position that acknowledges or accepts the placement of the progressive wager;
- (b) A control device that controls or monitors the placement of progressive wagers at the gaming table, including a mechanism, such as a “lock-out” button, that prevents the recognition of any progressive wager that a player attempts to place after the dealer has announced “No more bets”;
- (c) One or more devices that meet the requirements of 205 CMR for progressive wagers and payouts at table games;
- (d) Any other equipment or device that contributes to the efficient operation or integrity of the game; and
- (e) Written procedures for the operation and use of the system and its components.

146.27: Let It Ride Poker Table; Physical Characteristics

(1) Let it ride poker shall be played on a table having betting positions for seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a let it ride poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) Three separate designated betting areas at each betting position for the placement of wagers in accordance with the authorized Rules of the Game of Let it Ride Poker;
- (c) A separate designated area at each betting position for the placement of the cards of each player;
- (d) A separate designated area located directly in front of the table inventory container for the placement of the community cards;
- (e) The payout odds for all authorized wagers, including the let it ride bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker and the three-card bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, if the gaming licensee offers either optional wager;

- (f) The inscription indicating the payout limit per hand established by the gaming licensee pursuant to the authorized Rules of the Game of Let it Ride Poker or a generic inscription indicating the game is subject to the posted payout limit; and
- (g) If a gaming licensee offers the optional three-card bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, a separate designated area at each betting position for the placement of the three-card bonus wager.

(3) A sign shall be posted at each let it ride poker table that explains the details of the payout limit established pursuant to the authorized Rules of the Game of Let it Ride Poker and if a generic inscription is used pursuant to 205 CMR 146.27(2)(f), the sign shall also contain the established payout limit.

(4) Each let it ride poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

(5) If a gaming licensee offers the let it ride bonus wager authorized by the authorized Rules of the Game of Let it Ride Poker, the let it ride poker table shall also include the following equipment or devices, which shall be submitted to and approved by the Bureau, together with the procedures for their operation and use:

- (a) A wagering device at each betting position that acknowledges or accepts the placement of the let it ride bonus wager;
- (b) A control device that controls or monitors the placement of let it ride bonus wagers at the gaming table, including a mechanism that prevents the recognition of any let it ride bonus wager that a player attempts to place after the dealer has announced "No more bets"; and
- (c) Any other equipment or device that contributes to the efficient operation or integrity of the game.

146.28: RESERVED

146.29: Fast Action Hold 'em Table; Physical Characteristics

(1) Fast action hold 'em shall be played at a table having betting positions for the players on one side of the table and a place for the dealer on the opposite side. Such betting positions shall not exceed nine in number depending on the size of the table. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

- (2) The layout for the fast action hold 'em table (the layout) shall include, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position;
 - (c) A separate area located immediately to the right of each betting area designated for the placement of cards to be discarded by a player pursuant to the authorized Rules of the Game of Fast Action Hold 'Em;

- (d) Five separate areas aligned in a row in the center of the layout for placement of the five community cards; and
 - (e) An inscription indicating that a “natural” pays five to one.
- (3) Each fast action hold ’em table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposites sides of, the dealer.

146.30: Casino War Table; Physical Characteristics

- (1) Casino war shall be played at a table having betting positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Casino war table shall include, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for the placement of initial and war wagers;
 - (c) A separate designated betting area for the placement of tie wagers; and
 - (d) The payout odds for a tie wager and war wager.
- (3) Each Casino war table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposites sides of, the dealer.

146.31: Colorado Hold ’em Poker Table; Physical Characteristics

- (1) Colorado hold ’em poker shall be played at a table having betting positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for the Colorado hold ’em poker table (the layout) shall include, at a minimum:
- (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for ante and bet wagers, and if a gaming licensee offers a bonus wager pursuant to the authorized Rules of the Game of Colorado Hold ’Em Poker, a separate designated betting area for the bonus wager;
 - (c) A separate area located immediately to the left of each betting area designated for the placement of the card to be discarded by a player pursuant to the authorized Rules of the Game of Colorado Hold ’Em Poker or;
 - (d) Three separate areas aligned in a row in the center of the layout for placement of the three community cards; and
 - (e) The payout odds for all winning authorized wagers, including an “immediate

winner” as defined at the authorized Rules of the Game of Colorado Hold ‘Em Poker.

- (3) Each Colorado hold ‘em poker table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.32: Boston 5 Stud Poker Table; Physical Characteristics

- (1) Boston 5 stud poker shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Boston 5 stud poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for the placement of ante wagers;
 - (c) A separate designated area shall be located immediately to the right of each ante betting area for the placement of first wagers;
 - (d) A separate designated area shall be located immediately to the right of each first wager betting area for the placement of second wagers;
 - (e) A separate designated area shall be located immediately above each ante betting area for the placement of optional bonus wagers; and
 - (f) Notice of signage for payout odds for all authorized wagers.
- (3) A sign shall be posted at each Boston 5 stud poker table that lists the payout odds for all authorized wagers.
- (4) Each Boston 5 stud poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.33: Double Cross Poker Table; Physical Characteristics

- (1) Double cross poker shall be played on a table having positions for seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a double cross poker table shall contain at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for the placement of the ante wager;
 - (c) Four separate designated betting areas at each betting position for the placement of raise wagers, with one raise wager area located to the left of the ante

betting area, one raise wager area located to the right of the ante betting area, one raise wager area located above the ante betting area and one raise wager area located below the ante betting area, so that the ante betting area and the four raise wager areas, when viewed from above, form the shape of a cross;

(d) A separate designated area at each betting position for the placement of a three-card wager, located to the right of the designated areas for the placement of ante and raise wagers;

(e) A separate designated area, located between the table inventory container and the player betting areas on the right hand side of the dealer, for the placement of the five community cards in the same type of cross formation created by the five wager areas described in 205 CMR 146.33(2)(b)-(c);

(f) A separate designated area, located between the table inventory container and the player betting areas on the left hand side of the dealer, for the placement of the dealer's two cards; and

(g) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each double cross poker table.

(4) Each double cross poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.34: Double Attack Blackjack Table; Physical Characteristics

(1) Double attack blackjack shall be played on a table having positions for six or seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a double attack blackjack table shall contain, at a minimum:

(a) The name or trade name of the gaming licensee; and

(b) Separate designated betting areas at each betting position for the placement of the initial wager, the double attack wager, and the optional bonus wager.

(3) The following inscriptions shall appear on the double attack blackjack layout:

(a) Blackjack pays 1 to 1;

(b) Dealer must draw to 16, and stand on all 17's; and

(c) Insurance pays 5 to 2.

(4) Payout odds for the optional bonus wager authorized by the authorized Rules of the Game of Double Attack Blackjack shall be inscribed on the layout or posted on a sign at each double attack blackjack table.

(5) Each double attack blackjack table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.35: Four-Card Poker Table; Physical Characteristics

- (1) Four-card poker shall be played on a table having positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a four-card poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Separate designated betting areas at each betting position for the placement of the ante wager and the play wager;
 - (c) Separate designated betting areas at each betting position for the placement of the aces up wager; and
 - (d) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds for all authorized wagers posted at each four-card poker table.
- (4) Each four-card poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.36: Texas Hold ‘em Bonus Poker Table; Physical Characteristics

- (1) Texas hold ‘em bonus poker shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Texas hold ‘em bonus poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each player position for the placement of ante wagers;
 - (c) Three separate designated areas at each player position for the placement of flop, turn and river wagers, which areas shall be located immediately above the ante betting area as viewed by a player;
 - (d) A separate designated area at each player position for the placement of an optional bonus wager, which area shall be located immediately above and to the right of the flop wager betting area as viewed by a player;
 - (e) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (f) A separate designated area for the placement of the dealer’s two cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.36(2)(e); and

(g) An inscription indicating that an ante wager shall receive a payout if a winning hand has a qualifying rank, as elected by the gaming licensee, of straight or higher or flush or higher.

(3) A sign that lists the payout odds for all authorized wagers shall be posted at each Texas hold 'em bonus poker table.

(4) Each Texas hold 'em bonus poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.37: Flop Poker Table; Physical Characteristics

(1) Flop poker shall be played on a table having positions for nine players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.

(2) The layout for a flop poker table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
- (b) Three separate designated betting areas at each player position for the placement of ante, pot and flop wagers, with the pot wager area closer to the dealer than the ante and flop wager areas;
- (c) An arc extending across all player positions with the areas designated for players' pot wagers on the side of the arc closer to the dealer and with the areas designated for players' ante and flop wagers on the side of the arc farther from the dealer;
- (d) A designated area at each player position for the placement of player cards located between the designated areas for the placement of the ante wager and the flop wager;
- (e) A designated area at the center of the gaming table for the placement of the three community cards;
- (f) A designated area at the center of the gaming table for the placement of collected pot wagers, which area shall be located farther from the dealer than the designated area described in 205 CMR 146.37(2)(b); and
- (g) Unless the gaming licensee complies with 205 CMR 146.37(3), an inscription listing the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.

(3) If the information required by 205 CMR 146.37(2)(g) is not inscribed on the layout, a sign shall be posted at each flop poker table that lists the payout odds for ante and flop wagers and indicating that the highest ranking hand wins all pot wagers.

(4) Each flop poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

(5) In addition to the requirements of 205 CMR 146.37(2), if a gaming licensee offers the three-card bonus wager, the flop poker table shall include a designated betting area at each player position for the placement of the three-card bonus wager. The flop poker table shall also contain a sign setting forth the payout odds for the three-card bonus wager.

146.38: Two-Card Joker Poker Table; Physical Characteristics

- (1) Two-card joker poker shall be played on a table having positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a two-card joker poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of the ante wager, call wager, pair up wager and super flush bonus wager;
 - (c) An inscription identifying the payout odds for all authorized wagers unless the gaming licensee chooses to comply with 205 CMR 146.38(3); and
 - (d) An inscription indicating that a joker may only be used to complete a pair unless the gaming licensee chooses to comply with 205 CMR 146.38(4).
- (3) If the payout odds are not inscribed on the layout as provided in 205 CMR 146.38(2)(c) a sign identifying the payout odds for all authorized wagers shall be posted at each two-card joker poker table.
- (4) If the layout is not inscribed with the information described in 205 CMR 146.38(2)(d) a sign shall be posted at each two-card joker poker table indicating that a joker may only be used to complete a pair.
- (5) Each two-card joker poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.39: Asia Poker Table; Asia Poker Shaker; Physical Characteristics; Computerized Random Number Generator

- (1) Asia poker shall be played at a table having places for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for an Asia poker table shall contain, at a minimum, the following:

- (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table with each area being numbered one through six;
 - (c) Three separate areas located below each betting area, which shall be designated for the placement of the high, medium and low hands of that player and configured with the high hand area farthest from the betting area, the low hand area closest to the betting area, and the medium hand area arrayed between the high hand area and the low hand area; and
 - (d) Three separate areas located in front of the table inventory container designated for the placement of the high, medium and low hands of the dealer and configured with the dealer's high hand area closest to the dealer, the dealer's low hand area farthest from the dealer, and the dealer's medium hand area arrayed between the dealer's high hand area and the dealer's low hand area.
- (3) Each Asia poker table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of the dealer.
- (4) Pursuant to the authorized Rules of the Game of Asia Poker, Asia poker may be played with a container, to be known as an "Asia poker shaker," which shall be used to shake three dice before each hand of Asia poker is dealt in order to determine the starting position for the dealing or delivery of the cards. The Asia poker shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
- (a) The Asia poker shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The Asia poker shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) As an alternative to using the shaker and dice described 205 CMR 146.39(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in Asia poker by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.40: Ultimate Texas Hold 'em Table; Physical Characteristics

- (1) Ultimate Texas hold 'em shall be played on a table having positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for an ultimate Texas hold 'em table shall contain, at a minimum:

- (a) The name or trade name of the gaming licensee;
 - (b) Four separate designated betting areas at each player position for the placement of ante, blind, play and trips wagers, configured with the trips wager area closest to the dealer, the play wager area farthest from the dealer, the ante wager area arrayed between the trips wager area and the play wager area, and the blind wager area to the right of and separated from the ante wager area by an “=” symbol;
 - (c) A separate designated area for the placement of the five community cards, which area shall be located in the center of the table between the table inventory container and the player betting areas;
 - (d) A separate designated area for the placement of the dealer’s two cards, which area shall be located between the table inventory container and the designated area for the community cards described in 205 CMR 146.40(2)(c);
 - (e) An inscription indicating that an ante wager shall push if the dealer has less than a pair; and
 - (f) Unless the gaming licensee complies 205 CMR 146.40(3) an inscription at each player position describing the following:
 - 1. The payout odds for blind and trips wagers;
 - 2. That a blind wager shall not be paid unless the player’s hand ranks higher than the dealer’s hand; and
 - 3. The rules governing the required amount of a play wager as a multiple of the player’s ante wager (three or four times the ante if made prior to any community cards being dealt; two times the ante if made after the flop is dealt but prior to the final two community cards being dealt; or equal to the ante if made after all community cards are dealt but prior to the dealer’s cards being revealed).
- (3) If the information required by 205 CMR 146.40(2)(f) is not inscribed on the layout, a sign shall be posted at each ultimate Texas hold ‘em table that sets forth such information.
- (4) Each ultimate Texas hold ‘em table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.41: Winner’s Pot Poker Table; Physical Characteristics

- (1) Winner’s pot poker shall be played on a table having positions for no more than seven players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a winner’s pot poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;

- (b) Four separate designated betting areas at each player position for the placement of ante, bet, double and jacks plus bonus wagers, configured in an array so that the jacks plus bonus wager area is closest to the dealer, the double wager area is second closest to the dealer, the bet wager area is third closest to the dealer, and the ante wager area is farthest from the dealer;
- (c) Three separate designated betting areas for the placement of the ante, bet and double wagers of the dealer, configured in an array in front of the dealer so that the double wager area is closest to the dealer, the bet wager area is the second closest to the dealer, and the ante wager area is farthest from the dealer;
- (d) A designated area at each player position for the placement of the face up cards of the player, which area shall be located to the left of and adjacent to the wagering areas of the player;
- (e) A designated area at the center of the gaming table for the placement of the face up cards of the dealer;
- (f) A designated area at the center of the gaming table for the placement of the collected wagers comprising the winner's pot; and
- (g) Unless the gaming licensee complies with 205 CMR 146.41(3), inscriptions:
 - 1. Listing the payout odds for the jacks plus bonus wager; and
 - 2. Indicating that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer.

(3) If the information required by 205 CMR 146.41(2)(g) is not inscribed on the layout, a sign shall be posted at each winner's pot poker table that lists the payout odds for the jacks plus bonus wager and indicates that the winner's pot shall be awarded to the highest ranking hand of a player or the dealer. In addition, a sign shall be posted at each winner's pot poker table indicating that:

- (a) The ante wager of a player who folds after the first three cards are dealt does not increment the winner's pot and is placed in the table inventory container;
- (b) The percentage or, if applicable, the dollar amount of the commission that shall be deducted from the winner's pot and placed in the table inventory container; and
- (c) The outcome of a jacks plus bonus wager of a player who has folded his or her hand shall be determined on the cards dealt to the player prior to folding.

(4) Each winner's pot poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.

146.42: Supreme Pai Gow Table; Pai Gow Poker Shaker; Physical Characteristics;
Computerized Random Number Generator

- (1) Supreme pai gow shall be played at a table having places for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a supreme pai gow table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Six separate designated betting areas for the players at the table for placement of the supreme pai gow wager with each area being numbered one through six;
 - (c) Two separate areas located below each betting area which shall be designated for the placement of the high and low hands of that player and configured with the high hand area farther from the betting area;
 - (d) Two separate areas located in front of the table inventory container designated for the placement of the high and low hands of the dealer and configured with the dealer's high hand closer to the dealer; and
 - (e) A separate designated area at each player position for placement of the bonus wager, which area shall be located immediately above and to the right of the supreme pai gow wagering area as viewed by the player.
- (3) Each supreme pai gow table shall have a drop box and tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.
- (4) Pursuant to the authorized Rules of the Game of Supreme Pai Gow, supreme pai gow may be played with a container, to be known as a "pai gow shaker," which shall be used to shake three dice before each hand of supreme pai gow is dealt in order to determine the starting position for the dealing or delivery of the cards. The pai gow shaker shall be designed and constructed to contain any feature the Bureau may require to maintain the integrity of the game and shall, at a minimum, adhere to the following specifications:
 - (a) The pai gow shaker shall be capable of housing three dice and shall be designed so as to prevent the dice from being seen while the dealer is shaking it; and
 - (b) The pai gow shaker shall have the name or identifying logo of the gaming licensee imprinted or impressed thereon.
- (5) As an alternative to using the shaker and dice described in 205 CMR 146.42(4), a gaming licensee may determine the starting position for the dealing or delivery of the cards in supreme pai gow by utilizing a computerized random number generator that automatically selects and displays a number from 1 through 7 inclusive. Any computerized random number generator proposed for use by a gaming licensee shall be approved by the Bureau.

146.43: Mississippi Stud; Physical Characteristics

- (1) Mississippi stud shall be played on a table having betting positions for six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Mississippi stud table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) A separate designated betting area at each betting position for the placement of the ante wager;
 - (c) Three separate designated betting areas at each betting position for the placement of the 3rd street, 4th street and 5th street wagers, which areas shall be located closer to the player than the ante wager betting area and, when viewed by the player, arrayed from left to right;
 - (d) Inscriptions at each betting position providing that:
 1. All bet wagers shall be in an amount equal to one, two or three times the amount of the player's ante; and
 2. The payout odds for all authorized wagers; and
 3. Three separate designated areas in front of the dealer for the placement of the community cards, with one area inscribed "3rd street," a second area inscribed "4th street," and a third area inscribed "5th street."
- (3) Each Mississippi stud table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of, the dealer.

146.44: Red Dog Table; Physical Characteristics

- (1) Red dog shall be played at a table having on one side places for no more than seven players and on the opposite side a place for the dealer. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a red dog table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game;
 - (b) Two separate designated betting areas for each player, clearly marked to distinguish between the original wager and the raise wager, and situated so that the betting area for the raise wager is closer to the player than the betting area for the original wager;
 - (c) An area designated for the placement of the first, second and third card; and
 - (d) The payout odds currently being offered in accordance with the authorized Rules of the Game of Red Dog.

(3) Each red dog table shall have a drop box and a tip box attached to it with the location of said boxes on the same side of the gaming table but on opposite sides of the dealer.

146.45: Dice: Physical Characteristics

- (1) Except as otherwise provided in 205 CMR 146.45(2), each die used in gaming shall:
- (a) Be formed in the shape of a perfect cube and of a size no smaller than 0.750 of an inch on each side nor any larger than 0.775 of an inch on each side;
 - (b) Be transparent and made exclusively of cellulose except for the spots, name or trade name of the gaming licensee and serial number or letters contained thereon;
 - (c) Have the surface of each of its sides perfectly flat and the spots contained in each side perfectly flush with the area surrounding them;
 - (d) Have all edges and corners perfectly square and forming perfect 90 degree angles;
 - (e) Have the texture and finish of each side exactly identical to the texture and finish of all other sides;
 - (f) Have its weight equally distributed throughout the cube and no side of the cube heavier or lighter than any other side of the cube;
 - (g) Have its six sides bearing white circular spots from one to six respectively with the diameter of each spot equal to the diameter of every other spot on the die;
 - (h) Have spots arranged so that the side containing one spot is directly opposite the side containing six spots, the side containing two spots is directly opposite the side containing five spots and the side containing three spots is directly opposite the side containing four spots; each spot shall be placed on the die by drilling into the surface of the cube and filling the drilled out portion with a compound which is equal in weight to the weight of the cellulose drilled out and which forms a permanent bond with the cellulose cube, and shall extend into the cube exactly the same distance as every other spot extends into the cube to an accuracy tolerance of .0004 of an inch; and
 - (i) Have imprinted or impressed thereon the name or trade name of the gaming licensee in which the die is being used.
- (2) Each die used in gaming at pai gow, pai gow poker, supreme pai gow or Asia poker shall comply with the requirements 205 CMR 146.45(1) except as follows:
- (a) Each die shall be formed in the shape of a perfect cube and of a size no smaller than .637 of an inch on each side nor any larger than .643 of an inch on each side;
 - (b) Instead of the name of the gaming licensee, a gaming licensee may, with the approval of the Bureau, have an identifying mark or logo imprinted or impressed on each die; and
 - (c) The spots on each die do not have to be equal in diameter.

(3) Each die used in gaming at mini-dice shall comply with the requirements of 205 CMR 146.45(1) or (2).

146.46: Dice: Receipt, Storage, Inspections, and Removal From Use

(1) When boxes of dice are received for use by the gaming licensee from the manufacturer or distributor thereof, at least two individuals, one of whom shall be from the games department and the other from the security department or accounting department, shall record on an inventory log as required in 205 CMR 146.46(2) the number of dice received. The individuals shall place boxes of dice in a locked cabinet in the cashiers' cage or within a primary or other secure storage area approved by the Bureau. Secure storage areas shall be used for the storage of surplus dice. Dice maintained in secure storage areas shall not be distributed to gaming pits or tables for use in gaming until the dice have been moved to a primary storage area.

(2) The gaming licensee shall maintain a log for each approved storage area to separately account for dice in accordance with an inventory system. The inventory system shall include the following:

(a) A dice inventory system, which shall include, at a minimum, the recordation of the following:

1. Balance of dice on hand and their location;
2. Dice received from the vendor;
3. Dice removed from storage;
4. Dice returned to storage;
5. Date of:
 - a. Receipt from vendor;
 - b. Removal from storage;
 - c. Return to storage; and
 - d. Physical inventory of dice.
6. Signatures of the games department and security and/or accounting department representatives participating in the procedure;
7. A reconciliation, on a daily basis, of the dice distributed, destroyed, and cancelled; returned to the storage area; in use on an open gaming table for more than 24 hours; and in dice reserve, if any; and
8. A physical inventory of the dice at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of dice on hand as required in accordance with 205 CMR 146.46(2). Any discrepancies shall immediately be reported to the Bureau.

(3) All approved storage areas and pit stands used to store dice for more than one gaming day, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the games department or cashiers' cage shall maintain the other key; provided, however, that no person employed by the games department below

the table games shift manager in the organization hierarchy shall have access to the games department key. Dice stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or games supervisor thereof.

(4) When removing dice from the primary storage area, a representative of the games department, in the presence of a security officer, shall remove the appropriate number of dice. The representative of the games department may be the table games shift manager or a games supervisor thereof, or an employee of the games department who reports directly to the shift manager, but shall in any event be licensed as a key gaming employee and shall have no direct supervisory responsibilities over the operation and conduct of the table games in a pit during that gaming day. This individual shall distribute sufficient dice to the table games supervisor. Dice in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the table games supervisor or supervisor thereof. If dice are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department. The security lock on the pit stand shall be used whenever the pit is closed.

(5) All envelopes and containers used in this section for dice pre-inspected at the pit stand or in a primary storage area and for those collected by security shall be transparent. The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.

(6) All dice shall be inspected and distributed to the gaming tables in accordance with one of the following applicable alternatives:

(a) Alternative No. 1: Distribution to and inspection at craps, mini-craps, mini-dice, or sic bo tables shall be as follows:

1. The table games shift manager or games supervisor thereof and the security officer who removed the dice from the primary storage area shall distribute sufficient dice directly to the games supervisor in each pit, or place them in a locked compartment in the pit stand, the keys to which shall be in the possession of the games supervisor or a supervisor thereof;
2. Immediately upon opening a table for gaming, the games supervisor shall distribute a set of dice to the table. At the time of receipt, a boxperson at each craps table and the floorperson at each sic bo, mini-dice, mini-craps table, in order to ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR 146, shall, in the presence of the dealer, inspect the dice given to him or her with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept in a compartment at each craps table or pit stand and shall be at all times readily available for inspection and use by the Bureau;

3. Following the inspection in 205 CMR 146.46(2):
 - a. For craps, the boxperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended;
 - b. For mini-craps, the floorperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended; and
 - c. For sic bo and mini-dice, the floorperson shall, in the presence of the dealer, place the required number of dice into the shaker and seal or lock the shaker. For sic bo, the floorperson shall then secure the sic bo shaker to the table in the presence of the dealer who observed the inspection. For mini-dice, the floorperson shall then give the sealed mini-dice shaker to the dealer, who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table; and
 - d. The games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or a supervisor thereof. No dice taken from this reserve shall be used for actual gaming until and unless inspected in accordance with 205 CMR 146.46(2).

(b) Alternative No. 2: Distribution to and inspection at the pit stand shall be as follows:

1. The table games shift manager or supervisor thereof and the security officer who removed the dice from the primary storage area shall distribute the dice directly to the games supervisor identified, who will perform the inspection in each pit.
2. The inspection of the dice at the pit stand shall be performed by:
 - a. For craps and mini-craps, a boxperson or floorperson in the presence of another boxperson or floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of a craps game; and
 - b. For sic bo, mini-dice, pai gow, pai gow poker, supreme pai gow, or asia poker, a floorperson, in the presence of another floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of such games.
3. To ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR 146, the dice shall be inspected with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept at the pit stand and shall be at all

times readily available for inspection and use by the Bureau. The inspection shall be performed on a flat surface, which allows the dice inspection to be observed through closed circuit television cameras and by any persons in the immediate vicinity of the pit stand.

4. After completion of the inspection, the dice shall be distributed as follows:

- a. For craps and mini-craps, the boxperson or floorperson who inspected the dice shall, in the presence of the other boxperson or floorperson who observed the inspection, distribute such dice to the boxperson assigned at each craps table or to the floorperson assigned at each mini-craps table. The craps boxperson or the mini-craps floorperson shall, in the presence of the dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table they shall never be left unattended;
- b. For sic bo and mini-dice, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, place the required number of dice into the shaker and seal or lock the shaker. For sic bo, the floorperson shall then secure the sic bo shaker to the table in the presence of the other floorperson who observed the inspection. For mini-dice, the floorperson shall then give the sealed mini-dice shaker to the dealer, who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table; and
- c. For pai gow, pai gow poker, supreme pai gow, or asia poker, the floorperson who inspected the dice shall, in the presence of the other floorperson who observed the inspection, distribute such dice directly to the dealer at each pai gow, pai gow poker, supreme pai gow, or asia poker table. The dealer shall immediately place the dice in the pai gow, pai gow poker, supreme pai gow, or asia poker shaker.

5. The games supervisor shall place extra sets of dice for dice reserve in the pit stand, as follows:

- a. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or a supervisor thereof.
- b. Except as otherwise provided in 205 CMR 146.46(6), all dice taken from the reserve shall be re-inspected by a games supervisor in the presence of another games supervisor in accordance with the inspection procedures set forth in 205 CMR 146.46(6)(a)2, prior to their use for actual gaming.
- c. In accordance with 205 CMR 146.46(6), previously inspected reserve dice may be used for gaming without being reinspected, if

they are maintained in a locked compartment in the pit stand, the key for which shall be in the possession of the games supervisor or games supervisor thereof.

d. In accordance with 205 CMR 146.46(6) and as an additional alternative to 205 CMR 146.46(6)(a)-(b), previously inspected reserve dice may be used for gaming without being reinspected, if they are maintained in a locked compartment in the pit stand in accordance with the following procedures:

- i. For craps and mini-craps, a set of at least five dice, after being inspected, shall be placed in a sealed envelope or container. A label that identifies the date of inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container.
- ii. For sic bo and mini-dice, the required number of dice, after being inspected, shall be placed in a sealed envelope or container or sealed or locked in a sic bo or mini-dice shaker. A label or seal that identifies the date of inspection and contains the signatures of those responsible for the inspection shall, respectively, be attached to each envelope or container or placed over the area that allows access to open the sic bo or mini-dice shaker.
- iii. For pai gow, pai gow poker, supreme pai gow, and asia poker, a set of three dice, after being inspected, shall be placed in a sealed envelope or container. A label that identifies the date of inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container.

(c) Alternative No. 3: Inspection in primary storage area and distribution to tables shall be as follows:

1. Inspection of dice for all table games in an approved primary storage area shall be performed by a games supervisor and a table games shift manager, in the presence of a security officer.
2. The dice shall be inspected with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet to ensure that the dice are in a condition to assure fair play and otherwise conform to M.G.L. c. 23K and 205 CMR. These instruments shall be maintained in the storage area and shall be at all times readily available for inspection and use by the Bureau.
3. After completion of the inspection, the person performing the inspection shall seal the dice as follows:
 - a. For craps and mini-craps, after each set of at least five dice are inspected, they shall be placed in a sealed envelope or container; provided, however, that reserve dice may be placed in individual sealed envelopes or containers. A label that identifies the date of

- the inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container;
- b. For sic bo and mini-dice, after each set of dice are inspected, they shall be sealed or locked in a manual shaker. A seal that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall then be placed over the area that allows access to open the shaker;
 - c. For pai gow, pai gow poker, supreme pai gow, or asia poker, after each set of three dice are inspected, they shall be placed in a sealed envelope or container. A label that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container; and
4. At the beginning of each gaming day and at such other times as may be necessary, a table games shift manager or games supervisor thereof and a security officer shall distribute the dice as follows:
- a. For craps and mini-craps, the sealed envelopes or containers of dice shall be distributed to a games supervisor in each craps or mini-craps pit or placed in a locked compartment in the pit stand by the games supervisor. When the sealed dice are distributed to the craps or mini-craps table, a boxperson at each craps table or a floorperson at each mini-craps table, after assuring the seals are intact and free from tampering, shall open the sealed envelope or container, in the presence of the dealer, and place the dice in a cup on the table for use in gaming. While dice are on the table, they shall never be left unattended.
 - b. For sic bo and mini-dice, the sealed manual shakers shall be distributed to the games supervisor supervising the game. For sic bo, the games supervisor shall then secure the manual sic bo shaker to the table. For mini-dice, the games supervisor shall give the sealed mini-dice shaker to the dealer who shall be primarily responsible for the security of the shaker at all times while the shaker is available for use at the table.
 - c. For pai gow, pai gow poker, supreme pai gow, or asia poker, the sealed envelope or container shall be distributed to a games supervisor in each pai gow, pai gow poker, supreme pai gow, or asia poker pit or placed in a locked compartment in the pit stand. When the sealed dice are distributed to the pai gow, pai gow poker, supreme pai gow, or asia poker table by the games supervisor, a floorperson, after assuring the seal and envelopes or containers are intact and free from tampering, shall open the sealed envelope or container, in the presence of the dealer, and place the dice in the pai gow, pai gow poker, supreme pai gow, or asia poker shaker.

d. When the envelope or container or the seal is damaged, broken, or shows indication of tampering, the dice shall not be used for gaming activity unless the dice are re-inspected as follows:

i. For craps, mini-craps, mini-dice, and sic bo, in accordance with the procedures in 205 CMR

146.46(6)(a)(2); and

ii. For pai gow, pai gow poker, supreme pai gow, or asia poker, in accordance with the procedures in 205 CMR 146.46(6)(a)(2).

e. The games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the games supervisor or supervisor thereof.

f. A micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet shall also be maintained in a locked compartment in each pit stand, and each such instrument shall be at all times readily available for inspection and use by the Bureau.

g. Any primary storage area in which dice are inspected in accordance with this section, shall be equipped with closed circuit television camera coverage capable of observing the entire inspection procedure.

5. The gaming licensee shall remove any dice at any time of the gaming day if there is any indication of tampering, flaws, or other defects that might affect the integrity or fairness of the game or at the request of the Bureau.

6. At the end of each gaming day or at such other times as may be necessary, the games supervisor shall visually inspect each die for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report (Report) comprised of an original and duplicate, which along with the evidence, shall be retrieved by an agent of Bureau. The original and duplicate shall contain at a minimum:

a. Date and shift of inspection;

b. Name of games supervisor conducting the inspection. The inspection required by this subsection shall be performed by a games supervisor other than the one who originally inspected the dice;

c. Pit number, table number, and type of game;

d. Description (for example, shaved corners);

e. Signature of games supervisor conducting the inspection;

f. Signature of security representative taking custody of the die; and

g. The signature of the agent of the Bureau inspecting or accepting the die. The Bureau agent shall retain the original and return the duplicate to the security department. A receipt shall be issued to the agent of the Bureau for any die retained by the Bureau. The receipt shall be signed by the security representative releasing the die to the Bureau and the agent of the Bureau accepting the die. The receipt shall be retained with the security department copy of the Report. Any die not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures.

7. Any dice showing evidence of tampering shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container, which shall identify the table number, date, and time and shall be signed by a person assigned to directly operate and conduct the game at that table and a games supervisor assigned the responsibility for supervising the operation and conduct of such game. The security officer taking custody of the dice and delivering the dice to the Bureau shall also sign the label.

8. All other dice not showing evidence of tampering shall be put into envelopes or containers at this time. A label shall be attached to each envelope or container which shall identify the table number, date, and time and shall be signed by the appropriate persons identified in 205 CMR 146.46(4). The envelope or container shall be appropriately sealed and maintained within the pit until collection by a security officer.

9. All extra dice in dice reserve that are to be destroyed or cancelled shall be placed in a sealed envelope or container, with a label attached to each envelope or container that identifies the date and time and is signed by the games supervisor.

10. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers of used dice and any dice in dice reserve that are to be destroyed or cancelled and shall transport them to the security department for cancellation or destruction. No dice that have been placed in a cup or shaker for use in gaming shall remain on a table for more than 24 hours.

11. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee and, and at such other times as may be necessary, a table games shift manager or games supervisor thereof may collect all extra dice in dice reserve. If collected, dice shall be returned to the primary storage area; provided, however, that any dice that have not been inspected and sealed pursuant to the requirements in 205 CMR 146.46(6)(c) shall, prior to use for actual gaming, be inspected as follows:

- a. For craps, mini-craps, mini-dice, or sic bo, in accordance with the requirements in 205 CMR 146.46(6)(b)(4)(b); and
- b. For pai gow, pai gow poker, supreme pai gow, or asia poker, in accordance with the requirements in 205 CMR 146.46(6). If not collected, all dice in dice reserve must be reinspected prior to their use for gaming, except for those dice maintained in a locked compartment.

12. Other than dice retained for Bureau inspection, dice shall be cancelled or destroyed within 72 hours of collection by the security department. In addition, once dice retained as evidence by the Bureau are released to the security department, the dice shall immediately be destroyed or cancelled. Destruction and cancellation of dice shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau. Destruction of dice shall be by shredding by the security department or a vendor approved by the Bureau. Cancellation of dice by the security department shall be by drilling a circular hole of at least one fourth of an inch in diameter through the center of each die.

146.47: Manual and Automated Dice Shakers: Security Procedures

(1) Manual sic bo shakers and mini-dice shakers which have been filled with dice in accordance with 205 CMR 146.46 may only be stored in a locked compartment in the primary storage area. Manual sic bo shakers and mini-dice shakers which have not been filled with dice may be stored in a locked compartment in the pit stand. An automated dice shaker which has been filled with dice must be secured to the gaming table at all times. An automated dice shaker which has not been filled with dice may be stored in a locked compartment in the pit stand.

(2) At the end of each gaming day a pit manager shall inspect all sic bo shakers, mini-dice shakers and automated dice shakers that have been placed in use for gaming for evidence of tampering. Such evidence discovered at this time shall be immediately reported to the Bureau. At a minimum, such reports shall include:

- (a) The date and time when the tampering was discovered;
- (b) The table number where the shaker was used; and
- (c) The name and license number of the individual discovering the tampering.

146.48: Cards: Physical Characteristics

(1) Cards used to play authorized table games shall be in decks of 52 cards, except as otherwise authorized by 205 CMR 146.48(8), with each card identical in size and shape to every other card in such deck.

- (2) Each deck shall be composed of four suits: diamonds, spades, clubs and hearts, or as otherwise authorized by 205 CMR 146.48(8).
- (3) Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, nine, eight, seven, six, five, four, three, and two. The face of the ace, king, queen, jack, and 10 value cards may contain an additional marking, which will permit a dealer, prior to exposing his or her hole card at the game of blackjack, to determine the value of that hole card.
- (4) The backs of each card in the deck shall be identical and no card shall contain any marking, symbol or design that will enable a person to know the identity of any element printed on the face of the card or that will in any way differentiate the back of that card from any other card in the deck.
- (5) The backs of all cards in the deck shall be designed so as to diminish as far as possible the ability of any person to place concealed markings thereon.
- (6) The design to be placed on the backs of cards used by gaming licensees shall contain the name or trade name of the gaming licensee and shall be submitted to the Bureau prior to use of such cards in gaming activity.
- (7) Each deck of cards shall be packaged separately or in a set containing the number of decks authorized by 205 CMR 146.48 and selected by a gaming licensee for use in a particular table game. Each package of cards shall be sealed in a manner so as to provide evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a set:
- (a) The package shall have a label affixed thereto that indicates or contain a window that reveals an adequate description of the contents of the package, including without limitation, the name of the gaming licensee for which the cards were manufactured, the type of cards, the color(s) of the backs of the cards, the date and time that the cards were manufactured, and the total number of cards in the set; and
 - (b) No deck of cards shall be separated from the set for independent use at a table game.
- (8) Nothing in this section shall prohibit a manufacturer from manufacturing decks of cards with one or more jokers contained therein; provided, however, such jokers shall not be used by the gaming licensee in the play of any game other than pai gow poker, two-card joker poker, Asia poker or supreme pai gow in accordance with the provisions of the authorized Rules of the Game of Pai Gow Poker, Two Card Joker Poker, Asia Poker, and Supreme Pai Gow.
- (9) In addition to satisfying the requirements of this section, the cards used by a gaming licensee at poker must:

- a. Be visually distinguishable from the cards used by that gaming licensee to play any other table game; and
- b. Be made of plastic.

10. Each gaming licensee which elects to offer the game of poker shall be required to have and use on a daily basis at least four visually distinguishable card backings for the cards to be used at the game of poker. These card backings may be distinguished, without limitation, by different logos, different colors or different design patterns.

146.49: Cards: Receipt, Storage, Inspections, and Removal From Use

(1) When decks of cards are received for use in the gaming establishment from the manufacturer or distributor thereof, at least two individuals, one of whom shall be from the casino games department and the other from the security department or accounting department, shall record on an inventory log required in 205 CMR 146.46(2), the number of decks received. The individuals shall place the decks of cards in a locked cabinet in the cashiers' cage or within a primary or secondary storage area located in the cashiers' cage or in another secure place approved by the Bureau. Secondary storage areas shall be used for the storage of surplus decks of cards. Decks of cards maintained in secondary storage areas shall not be distributed to gaming pits or tables for use in gaming until the decks have been moved to a primary storage area. A gaming licensee may have a separate storage area approved by the Bureau for decks of cards to be used at the game of poker.

(2) The gaming licensee shall maintain an inventory log (manual or electronic) for each approved storage area, to separately account for decks of cards packaged individually and in sets of multiple decks in accordance with the gaming licensee's card inventory system, which shall include the recordation of the following:

- (a) The decks of cards received from the vendor;
- (b) The decks of cards removed from storage;
- (c) The decks of cards returned to storage;
- (d) The date of receipt of, removal from, return to, or physical inventory;
- (e) The signatures of the games, security and/or accounting department personnel participating in the procedure;
- (f) A reconciliation on a daily basis of the decks of cards distributed, destroyed and cancelled, returned to the storage area, in use on an open gaming table for more than 24 hours and, if any, in card reserve; and
- (g) A physical inventory of the decks of cards at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of decks of cards on hand as required in accordance with 205 CMR 149(1).
- (h) Any discrepancies shall immediately be reported to the Bureau.

(3) All primary, secondary, poker storage areas, and pit stands used to store cards for more than one gaming day, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the games department or cashiers' cage shall maintain the other key; provided, however, that no person employed by the games department below the table games shift manager in the organizational hierarchy shall have access to the games department key for the primary and secondary storage areas and no person below the poker shift supervisor in the organizational hierarchy shall have access to the games department key to the poker storage area. Decks of cards stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or supervisor thereof.

(4) When removing cards from the primary storage area, a representative of the games department, in the presence of a security officer, shall remove the appropriate number of decks of cards. The representative of the games department may be the table games shift manager or a supervisor thereof, or an employee of the games department who reports directly to the shift manager, and shall be licensed as a gaming key employee and shall have no direct supervisory responsibilities over the operation and conduct of the table games in a pit during that gaming day. This individual shall distribute sufficient decks to the table games supervisor and, if applicable, to the poker shift supervisor. Decks of cards in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the table games supervisor or the poker shift supervisor or supervisor thereof. If decks of cards are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department.

- (a) If the decks are to be inspected at open gaming tables pursuant to 205 CMR 149(6), the table games supervisor shall distribute the decks to the dealer at each table or the poker shift supervisor shall transport the decks to the poker pit stand for subsequent distribution to the dealer at each poker table either directly or through the floorperson assigned to supervise the dealer.
 - (i) Prior to distributing decks to each poker table, the poker shift supervisor or floorperson shall examine each deck to determine if any replacement cards are necessary pursuant to 205 CMR 149(6). If needed, the poker shift supervisor or floorperson shall place the appropriate replacement cards into the deck from the cards held in reserve at the pit stand. Upon insertion of the replacement cards into the deck, the poker shift supervisor or floorperson shall re-examine the front of each card and the back of each card to ensure a consistent shading pattern and to ensure that the condition of the deck with the inclusion of the replacement cards has sufficient quality in order to maintain the integrity of gaming at poker.
 - (ii) If the integrity of gaming at poker would in any way be compromised by the use of the deck with the replacement cards, the entire deck of cards shall be placed in a sealed envelope or container, identified with the date and time and

shall be signed by the poker shift supervisor. The poker shift supervisor shall maintain the envelope or container in a secure place within the pit stand until collection by a security officer.

(5) When removing cards from the poker storage area, the poker shift supervisor or supervisor thereof and a casino security officer shall, prior to the commencement of each gaming day and at such other times as may be necessary, remove the appropriate number of decks from the poker storage area and distribute the decks in accordance with the provisions of 205 CMR 146.49(4)(a). The number of decks distributed shall include extra decks that shall be placed in the pit stand for card reserve. Decks of cards in the pit stand shall be placed in a locked compartment, the keys to which shall be in the possession of the poker shift supervisor or supervisor thereof. If decks of cards are stored in the pit stand for more than one gaming day, the pit stand shall be equipped with a second lock, the key to which shall be maintained and controlled by the security department.

(6) With the exception of cards which are pre-inspected and pre-shuffled, each deck of cards shall be inspected by a dealer and the inspection verified by a table games supervisor prior to the use of the cards on a gaming table.

(a) Card inspection at an open gaming table shall require each deck of cards to be sorted into sequence and into suit and a visual inspection of the back of each card. If, after inspecting the cards, the dealer finds that a card is unsuitable for use or an extra card is found, the following procedures shall be observed:

(i) If a card is unsuitable for use:

1. A poker shift supervisor or games supervisor shall bring a substitute card from the card reserve in the pit stand;
2. The unsuitable card shall be placed in a sealed envelope or container, identified by table number, date, and time and shall be signed by the dealer and floorperson assigned to that table; and
3. The poker shift supervisor or games supervisor shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer; or

(ii) If an extra card is found:

1. The poker shift supervisor or games supervisor shall place the extra card in a sealed envelope or container, identified by table number, date and time and signed by the dealer and floorperson assigned to that table; and
2. The poker shift supervisor or games supervisor shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer.

(b) The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.

(7) Any cards which have been opened and placed on a gaming table shall be changed at least every 24 hours. Notwithstanding the foregoing:

- (a) Except as otherwise provided in 205 CMR 146.49(7)(e) for baccarat and in 146.18(c) for mini-baccarat, cards opened for use on a baccarat, mini-baccarat, or fast action hold 'em table shall be changed at least once during the gaming day;
- (b) Cards opened for use on a pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, two-card joker poker, flop poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker table and dealt from a dealing shoe and cards opened for use on a double down stud table and dealt from the hand shall be changed at least every eight hours;
- (c) Cards opened for use on a pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker table and dealt from the dealer's hand shall be changed at least every four hours;
- (d) Cards opened for use on a blackjack table offering the 6 to 5 blackjack variation shall be changed at least every four hours;
- (e) Cards opened for use on a baccarat table using the alternative dealing procedure shall be changed after each shoe;
- (f) Cards opened for use on a poker table shall be changed at least every six hours; and
- (g) Cards opened for use on a blackjack, Spanish 21 or double attack blackjack table, or on a mini-baccarat table using the alternative dealing procedures set forth in Section 14 of the Authorized Rules of the Game for Mini-Baccarat, may be used for no more than 48 hours if the following requirements are satisfied:
 - 1. The gaming table shall remain open for gaming during the entire period of card usage;
 - 2. At least six decks of cards shall be used to play the game; and
 - 3. A table games shift manager shall identify for the surveillance department those gaming tables at which cards are in use for the extended period.

(8) Cards damaged during course of play shall be replaced by the dealer who shall request a floorperson or supervisor thereof for the game of poker or casino supervisor for all other games to bring cards in substitution from the pit stand.

- (a) The damaged cards shall be placed in a sealed envelope, identified by table number, date and time and shall be signed by the dealer and the individual who brought the replacement card to the table.
- (b) The poker shift supervisor or casino supervisor shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.

(9) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, or at the end of the extended period pursuant to 205 CMR 146.49(7)(g), and at such other times as may be necessary, the floorperson or supervisor thereof for the game of poker or casino supervisor for all other games shall collect all used cards required to be removed from play.

(a) These cards shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container which shall identify the table number, date and time and shall be signed by the dealer and floorperson assigned to the table.

(b) The poker shift supervisor or casino supervisor shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.

(10) The gaming licensee shall remove any cards at any time during the day if there is any indication of tampering, flaws, scratches, marks or other defects that might affect the integrity or fairness of the game, or at the request of the Bureau.

(11) Except for decks that have been pre-shuffled and pre-inspected in accordance with 205 CMR 146.50, all extra decks or packaged sets of multiple decks in card reserve with broken seals shall be placed in a sealed envelope or container, with a label attached to each envelope or container that contains the number of decks or packaged sets of multiple decks, as applicable, included therein, the date and time and the signature of the floorperson or supervisor thereof for poker and the pit boss for all other games.

(12) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers with damaged cards, cards required to be removed that gaming day, and all extra decks in card reserve with broken seals, except those that have been pre-shuffled and pre-inspected in accordance with 205 CMR 146.50, and shall return the envelopes or containers to the security department.

(13) At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the gaming licensee, and at such other times as may be necessary, a table games shift manager or games supervisor thereof may collect all extra decks in card reserve. If the gaming licensee maintains a separate storage area for poker cards, a poker shift supervisor or supervisor thereof may collect all extra decks in card reserve for the game of poker. If collected, all sealed decks shall either be cancelled or destroyed or returned to the storage area.

(14) When the envelopes or containers of used cards and reserve cards with broken seals are returned to the casino security department, they shall be inspected for tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play.

- (a) For cards used in blackjack, Spanish 21, double attack blackjack, double cross poker, red dog, casino war, fast action hold 'em, or mini-baccarat using the dealing procedures in the authorized Rules of the Game, the gaming licensee shall cause to be inspected either:
 - (i) All decks used during the day; or
 - (ii) A sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved by the Bureau. This sample shall be collected, stored and inspected separately from the sample required by 205 CMR 146.49(14)(b), and shall not be commingled with any cards from that sample.

- (b) For cards used in baccarat, or cards used in mini-baccarat using the dealing procedures in the authorized Rules of the Game, the gaming licensee shall cause to be inspected all decks used during the day. Notwithstanding the foregoing, for any decks that are opened for a single use in a shoe (the cards are not reshuffled for a subsequent use and are removed from the table), a gaming licensee may cause to be inspected a sample of decks selected at random or in accordance with an approved stratification plan, provided that the procedures for selecting the sample size and for assuring a proper selection of the sample are submitted to and approved by the Bureau.

- (c) The gaming licensee shall also inspect:
 - (i) Any cards which the Bureau requests the gaming licensee to remove for the purpose of inspection;
 - (ii) Any cards the gaming licensee removed for indication of tampering;
 - (iii) All cards used for pai gow poker, Caribbean stud poker, let it ride poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud or three-card poker; and
 - (iv) All cards used for poker.

- (d) The procedures for inspecting all decks required to be inspected under this subsection, shall, at a minimum, include:
 - (i) The sorting of cards sequentially by suit or utilizing a machine approved by the Bureau capable of reading the cards to determine whether any deck contains missing or additional cards;
 - (ii) The inspection of the backs with an ultra- violet light;
 - (iii) The inspection of the sides of the cards for crimps, bends, cuts and shaving; and
 - (iv) The inspection of the front and back of all plastic cards for consistent shading and coloring.

- (e) If, during the inspection procedures required in 205 CMR 146.49 one or more plastic cards in a deck are determined to be unsuitable for continued use, those cards shall be placed in a sealed envelope or container and a two-part Card Discrepancy Report shall be completed in accordance with 205 CMR 146.49(14)(j).
- (f) Upon completion of the inspection procedures required by 205 CMR 146.49, each deck of plastic cards which is determined suitable for continued use shall be placed in sequential order, repackaged and returned to the primary or poker storage area for subsequent use. If a deck has any missing cards, the individual who repackages the cards shall indicate the need for the appropriate replacement card(s) in a manner documented in the gaming licensee's internal control procedures.
- (g) The gaming licensee shall develop internal control procedures for returning the repackaged cards to the storage area.
- (h) The individuals performing said inspection shall complete a work order form which shall detail the procedures performed and list the tables from which the cards were removed and the results of the inspection. The individual shall sign the form upon completion of the inspection procedures.
- (i) The gaming licensee shall submit the training procedures for those employees performing the inspection to the Bureau.
- (j) Evidence of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play discovered at this time, or at any other time, shall be immediately reported to the Bureau by the completion and delivery of a two-part Card Discrepancy Report.
- (k) At the end of each gaming day or at such other times as may be necessary, the gaming supervisor identified in 205 CMR 146.49(13) shall visually inspect each card for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report, which Report along with the evidence shall be retrieved by an agent of the Bureau. The original and duplicate Report shall contain, at a minimum:
 - (i) The date and shift of inspection;
 - (ii) The name of the supervisor conducting the inspection. The inspection required by this subsection shall be performed by a games supervisor other than the one who originally inspected the cards;
 - (iii) The pit number, table number, and type of game;
 - (iv) A description (for example, cut corners);

(v) The signature of the supervisor conducting the inspection;
(vi) The signature of the security representative taking custody of the card; and
(vii) The signature of the agent of the Bureau inspecting or accepting the card, who shall retain the original and return the duplicate to security. A receipt shall be issued to the agent of the Bureau for any card retained by the Bureau. The receipt shall be signed by the security representative releasing the card to the Bureau and the agent of the Bureau accepting the card. The receipt shall be retained with the Security copy of the Discrepancy Report. Any card not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures. The report shall accompany the cards.

- (l) Notwithstanding any provision in this subsection to the contrary, for cards used:
- (a) In any authorized game or variation thereof which permits a player to touch them, the gaming licensee shall cause to be inspected all decks used during the day; and
 - (b) At any gaming table for more than 24 hours pursuant to 205 CMR 146.49(7)(g), the gaming licensee shall cause to be inspected a sample of decks that is separate from the sample of decks selected pursuant to 205 CMR 146.49(14)(a)(ii), provided that the procedures for selecting the sample size and for assuring a proper stratification of the sample shall be submitted to and approved by the Bureau.

(15) If a deck of plastic cards has been reused 12 or more times and the deck has been determined to be suitable for reuse by the individual performing the inspection procedures required by 205 CMR 146.49(14)(c), before that deck may be reused at a poker table, the deck must be inspected by a poker shift supervisor or floorperson. A satisfactory inspection shall be documented by the poker shift supervisor or floorperson. If the poker shift supervisor or floorperson determines that the deck may not be reused, the deck shall be placed in a sealed envelope or container, with a label attached which identifies the date and time and shall be signed by the poker shift supervisor or floorperson. At the end of the gaming day or at such other times as may be necessary, said envelope or container shall be collected by a casino security officer and be returned to the casino security department for destruction or cancellation pursuant to 205 CMR 146.49(16)

(16) Where cards in an envelope or container are inspected and found to be without any indication of tampering, marks, alterations, missing or additional cards or anything that might indicate unfair play, those cards with the exception of plastic cards used at poker that are of sufficient quality for reuse, shall within 72 hours of collection be destroyed or cancelled. In addition, once cards retained as evidence by the Bureau are released to the security department, the cards shall immediately be destroyed or cancelled.

- (a) Destruction and cancellation of cards shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau.
- (b) Destruction of cards shall be by shredding by the security department or a vendor approved by the Bureau.
- (c) Cancellation of cards shall be by drilling a circular hole of at least one-fourth of an inch in diameter through the center of each card in the deck.
- (d) Documentation supporting the actual destruction and/or cancellation of the cards shall be prepared by the casino security department or vendor performing the process. At a minimum, such documentation shall include:
 - (i) The date and time that the cards were destroyed;
 - (ii) The name and signature of the individual(s) who performed the destruction/cancellation process;
 - (iii) The amount of cards that were destroyed or cancelled; and
 - (iv) The signature of the representative of the games department attesting to the number of cards (decks of cards) destroyed when the procedure is performed at the casino.

146.50: Pre-shuffled and Pre-inspected Cards

- (1) In lieu of the card shuffling and inspection procedures to be followed at an open gaming table set forth in 205 CMR 146.50, a gaming licensee may elect to:
 - (a) Pre-inspect and pre-shuffle cards prior to the delivery of the cards to an open gaming table; or
 - (b) Use a licensed vendor to supply pre-shuffled and pre-inspected cards.
- (2) If a gaming licensee elects to pre-inspect and pre-shuffle cards, the process shall occur at a closed gaming table or another location approved by the Bureau and shall be performed by a dealer and verified by a gaming establishment supervisor with no concurrent supervisory responsibility for open gaming tables. The procedures required by 205 CMR 146.50(2)(a)-(g) shall be recorded by the surveillance department and each such recording shall be retained by the gaming licensee for not less than seven days.
 - (a) Upon receipt of the decks of cards pursuant to 205 CMR 146.50(3)(b), the dealer shall perform the procedures in 205 CMR 146.50(2)(b)-(g) independently for each batch of cards that will be sealed in a container, with the number of decks of cards in each batch being equal to the number of decks of cards required for the table game in which they are intended to be used.
 - (b) The dealer shall visually inspect the back of each card to assure that it is not flawed, scratched or marked in any way that might compromise the integrity or fairness of the game.

- (c) The dealer shall then shuffle the cards, manually or using an approved automated shuffling device, in a manner permitted by the applicable regulations governing the table game at which the cards will be utilized.
- (d) To ensure that there are no missing or extra cards, the dealer shall inspect the cards utilizing a machine approved by the Bureau. The machine shall issue a receipt that shall, at a minimum, include:
1. The manufacturer, model and serial number of the card inspection machine;
 2. The name or identification number of the dealer who operates the machine;
 3. The location at which the inspection is performed;
 4. The date and time of the inspection;
 5. The manufacturer and type of cards, the number of decks, and the table game for which the cards are inspected;
 6. The result of the inspection and, if failed, the identification of any missing or extra card(s); and
 7. The number of the seal to be used on the clear container in which the cards will be placed pursuant to 205 CMR 146.50(2)(g).
- (e) If the inspection fails, the gaming licensee shall follow the procedures set forth in 205 CMR 146.49(6).
- (f) Upon completion of the pre-inspection and pre-shuffling of the cards in the batch, the dealer and supervisor shall sign the receipt certifying that the cards were pre-inspected and pre-shuffled in accordance with this subsection.
- (g) For each batch of pre-inspected and pre-shuffled cards the dealer shall place the cards together with the receipt required 205 CMR 146.50(2)(d) in a clear container that conforms to the requirements of 205 CMR 146.50(5). The container shall be sealed with a pre-numbered label unique to such container. Procedures for the maintenance and security of unused seals, and the distribution, return and reconciliation of seals used on containers holding pre-inspected and pre-shuffled cards shall be detailed in the gaming licensee's internal controls.
- (h) The sealed containers of cards shall be transported by a:
1. Table games supervisor to the gaming pit of the gaming tables where they will be utilized and either locked in the pit stand in accordance with 205 CMR 146.50(3) or (4), or placed in a locked cabinet in the gaming pit, the keys to which shall be available only to table games supervisors and subject to sign-out and sign-in procedures; or
 2. Table games supervisor or a gaming key employee designated in accordance with the provisions of 205 CMR 146.50(3) and a casino security officer to an approved primary card storage area or poker card storage area where they shall be placed back into card inventory and segregated from cards that have not been pre-inspected and pre-shuffled. A record of the transport of the sealed containers of cards to the card storage area shall be maintained by the casino security department.

(i) When cards are needed for play, each container of cards shall be delivered by a table games supervisor to an open gaming table. Upon delivery, the table games supervisor shall unseal the container, place the decks of cards on the gaming table in front of the dealer. The supervisor shall record on the receipt contained within the container, the date, time and shift that the container was opened, and the pit and table number where cards are to be used. Once the information has been recorded, the supervisor shall sign the receipt, and retain the receipt and container at the gaming table.

(3) If a gaming licensee elects to use a licensed vendor to supply pre-inspected and pre-shuffled cards, the manufacturer shall:

(a) Obtain approval from the Bureau for the automated shuffling device used to pre-shuffle cards; and

(b) Implement a process for shuffling and packaging cards which shall, at a minimum, include:

1. Visual inspection of the back of each card to assure that it is not flawed, scratched or marked in any way that might compromise the integrity or fairness of the game;

2. Verification that each package of cards contains the correct number and is constituted in accordance with the specific rules of the game the cards are intended for use;

3. Inserting the cards in a package with a tamper-proof seal(s) that bears a conspicuous indication if the package has been opened. The exterior of the package shall indicate:

a. The total number of decks contained within the package; and

b. The game(s) the cards are intended for use; and

c. Generation by the automated shuffling device in use, of a receipt to be inserted in the sealed package which shall include the following information:

(i) The total number of cards and decks contained within the package;

(ii) The date and time the cards were shuffled and verified;

(iii) Identification of the manufacturer's employee who performed the process in 205 CMR 146.50(3)(b); and

(iv) The manufacturer, model and serial number of the device used to shuffle the cards.

(4) Cards inspected and shuffled in accordance with 205 CMR 146.50(3) shall be delivered to an open gaming table in the manufacturer's sealed packaging. Prior to using the cards at a gaming table, a games supervisor shall inspect the package for evidence of tampering. If there is evidence of tampering, all cards in the package shall not be used and the gaming licensee shall follow the procedures set forth in 205 CMR 146.49(6). Upon opening the package, the table games supervisor shall record on the receipt

contained within the package, the date and time that the package was opened, and the pit and table number where cards are to be used. Once the information has been recorded, the table games supervisor shall sign the receipt, place the cards on the table in front of the dealer, and retain the receipt and original package at the gaming table.

(5) For all pre-inspected and pre-shuffled cards, upon the initial use and patron request the dealer shall perform a strip or riffle shuffle of the cards and then cut the cards in the manner prescribed by the regulations governing the particular table game.

(6) Upon removal from a gaming table, pre-inspected and pre-shuffled cards shall be placed in the original container or package in which they were delivered to the table together with the receipt, and returned to the security department for inspection as required by 205 CMR 146.49(16).

(7) The Bureau may, at any time, require a gaming licensee to provide any container or package of pre-inspected and pre-shuffled cards.

146.51: Dealing Shoes; Automated Shuffling Devices

(1) A gaming licensee and gaming device vendor shall comply with, and the commission adopts and incorporates by reference *Gaming Laboratories International, LLC Standard GLI-29: Card Shufflers and Dealer Shoes*, version 1.0, released July 20, 2012.

(2) The following words and terms, when used in this section, shall have the following meanings:

"Base plate" means the interior shelf of the dealing shoe on which the cards rest.

"Face plate" means the front wall of the dealing shoe against which the next card to be dealt rests and which typically contains a cutout.

(3) Cards used for blackjack, Spanish 21, double attack blackjack, pai gow poker, mini-baccarat, red dog, Caribbean stud poker, let it ride poker, three-card poker, fast action hold 'em, Colorado hold 'em poker, casino war, Boston 5 stud poker, double cross poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and double down stud shall be dealt from a manual or automated dealing shoe which shall be secured to the gaming table when the table is open for gaming activity and secured in a locked compartment when the table is not open for gaming activity. Cards used to game at baccarat shall be dealt from a dealing shoe which shall be secured in a locked compartment when the table is not open for gaming activity. Notwithstanding the foregoing, cards used to game at:

(a) Pai gow poker, double down stud, Caribbean stud poker, three-card poker, Colorado hold 'em poker, Boston 5 stud poker, double cross poker, flop poker, four-card poker, Texas hold 'em bonus poker, ultimate Texas hold 'em poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and two-card

joker poker may be dealt from the dealer's hand in accordance with the rules for each game authorized pursuant to 205 CMR 147;

(b) The 6 to 5 blackjack variation shall be dealt from the dealer's hand in accordance with the Authorized Rules of the Game for Blackjack; and

(c) Blackjack may be dealt from the dealer's hand in accordance with the Authorized Rules of the Game for Blackjack.

(4) A device which automatically shuffles cards may be utilized at the game of blackjack, Spanish 21, double attack blackjack, pai gow poker, mini-baccarat, red dog, poker, Caribbean stud poker, let it ride poker, three-card poker, fast action hold'em, Colorado hold'em poker, casino war, Boston 5 stud poker, double cross poker, four-card poker, Texas hold'em bonus poker, ultimate Texas hold'em poker, flop poker, two-card joker poker, Asia poker, winner's pot poker, supreme pai gow, Mississippi stud and double down stud in addition to a manual or automated dealing shoe, provided that:

(a) The automated card shuffling device approved by the Bureau and the procedures for shuffling and dealing the cards through the use of the device are documented in the internal controls; and

(b) The security of an automated card shuffling device conforms to the security of any dealing shoe used at the gaming table pursuant 205 CMR 146.51.

(5) Each manual or automated dealing shoe shall be designed and constructed with such features as the Bureau may require maintaining the integrity of the game at which such shoe is used. Such features shall include, at a minimum, the following:

(a) At least the first four inches of the base plate shall be white;

(b) The sides of the shoe below the base plate shall be transparent or have a transparent sealed cutout unless the dealing shoe is otherwise constructed to prevent any object from being placed into or removed from the portion of the dealing shoe below the base plate and to permit the inspection of this portion of the shoe; and

(c) A stop underneath the top of the face plate shall preclude the next card to be dealt from being moved upwards for more than one-eighth inch distance.

(6) A baccarat dealing shoe, in addition to meeting the requirements of 205 CMR 146.51, shall also adhere to the following specifications:

(a) A removable lid shall be opaque from the point where it meets the face plate to a point at least four inches from the face plate;

(b) The sides and back above the base plate shall be opaque; and

(c) A device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe.

(d) A Harrigan plate be used in all baccarat shoes so the backs of the cards cannot be seen until drawn

(7) A pai gow poker dealing shoe, in addition to meeting the requirements of 205 CMR 146.51, may, in the discretion of the gaming licensee, also contain a device on the front of the face plate so as to preclude the players from viewing the next card to be dealt.

(8) All dealing shoes and shuffling devices in the casino shall be inspected at the beginning of each gaming day by a floorperson assigned to the table prior to cards being placed in them. The purpose of this inspection shall be to assure that there has been no tampering with the shoe or shuffling device.

(9) For gaming tables at which a manual dealing shoe is utilized, the shoe shall be located on the side of the gaming table to the left of the dealer, and the discard rack shall be located on the side of the gaming table to the right of the dealer. For gaming tables at which either an automated card shuffling device or an automated dealing shoe is utilized, the discard rack shall be on the side of the gaming table opposite such device or shoe.

146.52: Pai Gow Tiles; Physical Characteristics

(1) Pai gow shall be played with a set of 32 rectangular blocks to be known as tiles. Each tile in a set shall be identical in size and shading to every other tile in the set.

(2) Each tile used in gaming at pai gow shall:

(a) Be made of a non-transparent black material, formed in the shape of a rectangle, and be of a size no smaller than 2.500 inches in length, 1.000 inch in width and .375 of an inch in thickness;

(b) Have the surface of each of its sides perfectly flat, except that the front side of each tile shall contain spots which shall extend into the tile exactly the same distance as every other spot;

(c) Have on the back of each tile an identifying feature unique to each casino;

(d) Have the texture and finish of each side, with the exception of the front side, exactly identical to the texture and finish of all the other sides;

(e) Have the back and sides of each tile within a set be identical and no tile within a set shall contain any marking, symbol or design that will enable a person to know the identity of any element on the front side of the tile or that will distinguish any tile from any other tile within a set; and

(f) Have identifying spots on the front of the tiles which are either red or white or both.

(3) Each set of tiles shall be composed of 32 tiles as set forth in the Authorized Rules of the Game for Pai Gow.

(4) Each set of tiles shall be packaged separately and completely sealed in such a manner so that any tampering shall be evident.

146.53: Pai Gow Tiles: Receipt; Storage; Inspections, and Removal From Use

(1) When sets of tiles to be used at pai gow are received from the manufacturer or distributor thereof, they shall immediately following receipt be inspected by a member of the security department and a supervisor to assure that the seals on each package are intact, unbroken and free from tampering. Packages that do not satisfy these criteria shall be inspected at this time to assure that the tiles conform to Bureau standards and there is no evidence of tampering. Packages satisfying these criteria, together with packages having unbroken, intact, and untampered seals shall then be placed for storage in a locked cabinet within a primary or secondary storage area. Sets of tiles which are to be distributed to gaming pits or tables for use in gaming shall be distributed from a locked cabinet in the cashiers' cage or from another secure primary storage area, the location and physical characteristics of which shall be approved by the Bureau. Secondary storage areas shall be used for the storage of surplus tiles. Tiles maintained in secondary storage areas shall not be distributed to gaming pits or tables for use in gaming until the tiles have been moved to a primary storage area. All secondary storage areas shall be located in secure areas, the location and physical characteristics of which shall be approved by the Bureau.

(2) All primary and secondary storage areas, other than the cashiers' cage, shall have two separate locks. The security department shall maintain one key and the casino department or cashiers' cage shall maintain the other key; provided, however, that no person employed by the casino department below the table games shift manager in the organization hierarchy shall have access to the casino department key. Tiles stored in a cabinet within the cashiers' cage shall be secured by a lock, the key to which shall be maintained by a table games shift manager or casino supervisor thereof.

(3) Immediately prior to the commencement of each gaming day and at such other times as may be necessary, the table games shift manager or supervisor thereof, in the presence of a security officer, shall remove the appropriate number of sets of tiles for that gaming day from a primary storage area. Tiles are to be inspected by surveillance prior to the game beginning for the gaming day or when new tiles are being put into play.

(4) All envelopes and containers used to hold or transport tiles shall be transparent. The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.

(5) The table games shift manager or casino supervisor thereof shall distribute sufficient sets of tiles to the pit boss in each pai gow pit. The pit boss shall then distribute the sets to the dealer at each table, and shall place extra sets in reserve at the pit stand. Sets of tiles in reserve shall be placed in a locked compartment, keys to which shall be in the possession of the pit boss or casino supervisor thereof.

(6) If during the course of play any damaged tile is detected, the entire set of tiles shall be immediately replaced. The dealer or floorperson shall request that the pit boss bring a

substitute set of tiles to the table from the reserve in the pit stand. The set of damaged tiles shall be placed in a sealed envelope, identified by table number, date and time and shall be signed by the dealer and casino supervisor. The pit boss shall maintain the envelope or container in a secure place within the pit until collection by a casino security officer.

(7) Tiles used at pai gow shall be changed at least every 12 hours. The supervisor shall collect used tiles which shall be placed in a sealed envelope or container. A label shall be attached to each envelope or container which shall identify the table number, date and time and shall be signed by the dealer and casino supervisor. The pit boss shall maintain the envelopes or containers in a secure place within the pit until collection by a casino security officer.

(8) The gaming licensee shall remove any tiles at any time of the gaming day if there is any indication of tampering, flaws, scratches, marks or other defects that might affect the integrity or fairness of the game, or at the request of the Commission or the Bureau.

(9) All extra sets of tiles in reserve which have been opened shall be placed in a sealed envelope or container, with a label attached to each envelope or container which identifies the date and time and is signed by the pit boss.

(10) At the end of each gaming day or at such other times as may be necessary, a security officer shall collect and sign all envelopes or containers with damaged tiles, tiles used during the gaming day, and all extra tiles in reserve which have been opened, and shall return the envelopes or containers to the security department.

(11) At the end of each gaming day or at such other times as may be necessary, a table games shift manager or supervisor thereof may collect all extra sets of tiles in reserve which have not been opened. If collected, all unopened sets of tiles shall either be cancelled or destroyed or returned to the storage area.

(12) When the envelopes or containers of used tiles and reserve sets of tiles which have been opened are returned to the security department, they shall be inspected for tampering, marks, alterations, missing or additional tiles or anything that might indicate unfair play.

(a) The gaming licensee shall cause to be inspected all sets of tiles used during the gaming day.

(b) The procedures for inspecting all sets of tiles shall at least include the following:

1. The sorting of tiles by pairs;
2. The visual inspection of the sides and back of each tile for tampering, markings or alterations;
3. The inspection of the sides and back of each tile with an ultra-violet Light; and

4. White light to ensure no light can be seen coming through the tile ensuring that it is not transparent or translucent

(c) The individual performing the inspection required by 205 CMR 146.53 shall complete a work order form which shall detail the procedures performed and list the tables from which the tiles were removed and the results of the inspection. The individual shall sign the form upon completion of the inspection procedures.

(d) Evidence of tampering, marks, alterations, missing or additional tiles or anything that might indicate unfair play discovered at this time, or at any other time, shall be immediately reported to the security department and the Bureau. A security department member shall complete a two-part Discrepancy Report, which Report along with the evidence shall be retrieved by an agent of the Bureau.

The original and duplicate Report shall contain at a minimum:

1. The date and shift of inspection;
2. The name of the supervisor conducting the inspection. The inspection required by this subsection shall be performed by a supervisor other than the one who originally inspected the tiles;
3. The pit number, table number, and type of game;
4. A description (for example, shaved corners);
5. The signature of the supervisor conducting the inspection;
6. The signature of the security representative taking custody of the tile; and
7. The signature of the agent of the Bureau inspecting or accepting the tile, who shall retain the original and return the duplicate to security. A receipt shall be issued to the agent of the Bureau for any tile retained by the Bureau. The receipt shall be signed by the security representative releasing the tile to the Bureau and the agent of the Bureau accepting the tile. The receipt shall be retained with the Security copy of the Discrepancy Report. Any tile not retained by the Bureau shall be destroyed in accordance with the licensee's destruction procedures.

(e) If after completing the inspection procedures required in 205 CMR 146.53, it is determined that a complete set of 32 tiles removed from a gaming table is free from tampering, markings, or alterations, that set may be returned to the pai gow storage area for subsequent gaming use in accordance with the gaming licensee's internal control procedures. In no event may individual tiles from different sets be used to make a complete set for subsequent gaming use.

(13) The gaming licensee shall include in their internal control, procedures for:

(a) An inventory system which shall include the recordation of at least the following:

1. The balance of sets of tiles on hand;

2. The sets of tiles removed from storage;
3. The sets of tiles returned to storage or received from the manufacturer;
4. The date of the transaction; and
5. The signatures of the individuals involved;

(b) A reconciliation on a daily basis of the sets of tiles distributed and the sets of tiles destroyed and cancelled, the sets of tiles returned to the storage area and, if any, the sets of tiles in tile reserve; and

(c) A physical inventory of the sets of tiles at least once every three months. This inventory shall be performed by an individual with no incompatible functions and shall be verified to the balance of the sets of tiles on hand as required 205 CMR 146.53(13)(a)(1). Any discrepancies shall immediately be reported to the Bureau.

(14) Other than tiles retained for Bureau inspection, tiles shall be cancelled or destroyed within 72 hours of collection by the security department. In addition, once tiles retained as evidence by the Bureau are released to the security department, the tiles shall immediately be destroyed or cancelled.

(15) Destruction and cancellation of tiles shall take place in a secure place, the location and physical characteristics of which shall be approved by the Bureau. The adequacy of the destruction and cancellation process shall be approved by the Bureau. Destruction of tiles shall be by shredding by the security department or a vendor approved by the Bureau. Cancellation of tiles shall be by drilling a circular hole of at least one fourth of an inch in diameter through the center of each card in the deck.

146.54 Inspection and Approval of Gaming Equipment and Related Devices and Software

(1) No gaming equipment or any related device or software shall be used in a gaming establishment unless it is identical in all mechanical, electrical, electronic or other aspects to a prototype thereof that has been reviewed and approved for use by the independent testing lab certified by the commission.

(2) The following equipment shall be certified by an approved internal or independent testing lab followed by an on-site inspection by the Bureau prior to initial use or following any modification:

1. Slot machines;
2. Multiplayer systems;
3. Electronic table games;
4. Server supported slot systems;
5. Slot machine bonus systems;
6. Progressive equipment;
7. Kiosks;
8. Account based wagering systems;
9. Wireless wagering devices;
10. Slot monitoring systems;

11. Gaming voucher systems; and
12. Devices used in conjunction with a slot monitoring system.

(3) Any evidence that an item of gaming equipment or a related device or software used in a gaming facility has been tampered with or altered in any way which would affect the integrity, fairness, or suitability of the item for use in a casino shall be immediately reported to the Bureau. ~~A member of the gaming licensee's casino security department shall be required to the Bureau shall~~ ensure that the item is maintained in a secure manner ~~as directed by the Bureau.~~

(4) A gaming licensee and gaming device vendor shall comply with, and the commission adopts and incorporates by reference, *Gaming Laboratories International, LLC Standard GLI-25: Dealer Controlled Electronic Table Games, version 1.2, released September 6, 2011.*

146.55 Approval of Gaming Equipment / Approval of New Gaming Equipment

(1) At the Bureau's request, the manufacturer will supply a sample of suggested equipment for review and testing.

(2) A gaming licensee, in conjunction with other interested parties, may petition the ~~Commission-Bureau~~ in writing for the approval of new gaming equipment in accordance with the process set forth in 205 CMR 147 related to petitions for a new game or game variation. New gaming equipment pending approval shall be permitted to be used during new game or game variation field trials conducted pursuant to 205 CMR 147.04(5).

146.56 Security of Gaming Equipment

(1) Any equipment used for the operation of a gaming table that is stored in inventory shall be secured in a locked area with dedicated closed circuit television system coverage. This shall include, but not be limited to cards, dice, pai gow tiles, shuffle machines, wheels or devices that can affect or determine the outcome of the game. The areas to be secured shall include pit stands, card and dice storage rooms or any other back of house table games equipment storage areas and any other areas so designated by the Commission.

(2) Any gaming equipment that will be sold by a gaming licensee to an outside party shall require a notification to the Bureau office within the gaming establishment with the specific details. Cards and dice may be sold at the gift shop after the licensee has submitted their procedure for the process to the Bureau.

(3) All gaming equipment included in 205 CMR 146.00 shall be imprinted with a unique serial number.

146.57: RESERVED

146.58: Crazy 4 Poker Table; Physical Characteristics

- (1) Crazy 4 poker shall be played on a table having positions for no more than six players on one side of the table and a place for the dealer on the opposite side. A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design.
- (2) The layout for a Crazy 4 poker table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee;
 - (b) Separate designated betting areas at each betting position for the placement of the Ante, Play, Super Bonus and Queens Up Wagers for each player. The Super Bonus betting area must be located to the right of the Ante Wager betting area and be separated by an “=” symbol;
 - (c) If the licensee offers either the Four or Five-Card Progressive Payout Wager authorized under Section 7 of the Authorized Rules of the Game for Crazy 4 Poker, a separate area designated for the placement of the Progressive Payout Wager for each player;
 - (d) If a licensee offers the Five Card Hand Bonus Wager authorized under Section 7 of the Authorized Rules of the Game for Crazy 4 Poker, each betting position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager;
 - (e) An inscription identifying the payout odds for all authorized wagers or a sign identifying the payout odds or amounts for all permissible wagers posted at each Crazy 4 Poker table;
 - (f) Inscriptions that advise patrons of the following:
 - (i) The best four-card hand plays.
 - (ii) The dealer qualifies with a king or better.
 - (iii) A player who has a pair of aces or better may place a Play Wager in an amount up to three times the player's Ante Wager.
 - (iv) The player's Super Bonus Wager shall be returned if the player beats or ties the dealer with a hand that is not a straight or better.
- (4) Each Crazy 4 poker table shall have a drop box and a tip box attached to it on the same side of the table as, but on opposite sides of the dealer.
- (5) If the gaming licensee offers either a Four or Five-Card Progressive Payout Wager in accordance with Section 7 of the Authorized Rules of the Game for Crazy 4 Poker, the Crazy 4 Poker table must have a progressive table game system, in accordance with 205 CMR 143.02 for the placement of Progressive Payout Wagers. If the gaming licensee is offering a Progressive Payout Wager on multiple linked tables or games in the same gaming establishment, the progressive table game system must comply with 205 CMR 143.02. The progressive table game system must include:

- (a) A wagering device at each betting position that acknowledges or accepts the placement of the Progressive Payout Wager; and
- (b) A device that controls or monitors the placement of Progressive Payout Wagers at the gaming table, including a mechanism, such as a lock-out button, that prevents the recognition of any Progressive Payout Wager that a player attempts to place after the dealer has announced “no more bets.”

(6) If the gaming licensee offers the Five Card Hand Bonus Wager authorized under Section 7 of the Authorized Rules of the Game for Crazy 4 Poker, the Crazy 4 Poker table must have a table game system, in accordance with XXXX and an electronic wagering system in accordance with XXXX and XXXX (relating to electronic wagering systems; and procedures for buying in to and cashing out of a table game using an electronic wagering system). Each betting position must contain an electronic wagering system for the placement of the Five Card Hand Bonus Wager. The system must include a mechanism, such as a lockout button, that prevents the placement of any Five Card Hand Bonus Wagers that a player attempts to place after the dealer has begun dealing the cards. If the certificate holder is offering a Five Card Hand Bonus Wager on multiple linked tables or games in the same gaming establishment, the progressive table game must comply with 205 CMR 143.02.

146.59: RESERVED

146.60: Free Bet Blackjack

(1) Free Bet Blackjack shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side of the table.

(2) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Free Bet Blackjack table shall contain, at a minimum:

- (a) The name or logo of the gaming licensee;
- (b) A separate betting area designated for the placement of the Blackjack Wager for each player;
- (c) The following inscriptions:
 - (i) Blackjack pays 3 to 2;
 - (ii) Insurance pays 2 to 1;
 - (iii) Dealer shall draw to 16 and stand on all 17s or other similar language approved by the Bureau;
 - (iv) Blackjack Wagers will push if the dealer's hand has a total point count of 22 or other similar language approved by the Bureau; and
 - (v) Surrender is not available on a Free Bet Blackjack table or other similar language approved by the Bureau, unless the gaming licensee posts a sign at each Free Bet Blackjack table specifying that surrender is not available.

(d) If the licensee offers the Push 22 Wager, a separate area designated for the placement of the wager for each player;

(e) Inscriptions that advise patrons of the payout odds or amounts for all permissible wagers offered by the certificate holder unless a sign identifying the payout odds or amounts for all permissible wagers is posted at each Free Bet Blackjack table.

(3) Each Free Bet Blackjack table must have a drop box and a tip box attached on the same side of the table as, but on opposite sides of, the dealer.

(4) Each Free Bet Blackjack table must have a card reader device attached to the top of the dealer's side of the table. The floorperson assigned to the Free Bet Blackjack table shall inspect the card reader device at the beginning of each gaming day to ensure that there has been no tampering with the device and that it is in proper working order.

(5) Each Free Bet Blackjack table must have a discard rack securely attached to the top of the dealer's side of the table. The height of each discard rack must either:

(a) Equal the height of the cards, stacked one on top of the other, in the total number of decks that are to be used in the dealing shoe at that table; or

(b) Be taller than the height of the total number of decks being used if the discard rack has a distinct and clearly visible mark on its side to show the exact height for a stack of cards equal to the total number of cards in the number of decks to be used in the dealing shoe at that table.

146.61: Heads Up Hold 'Em

(1) Heads Up Hold 'em shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a Heads Up Hold 'em table shall contain, at a minimum:

(a) The name or trade name of the gaming licensee;

(b) A separate designated betting area at each betting position for the placement of the ante wager;

(c) A separate designated betting area located immediately behind each ante wager betting area for the placement of the raise wager;

(d) The odds wager, trips plus wager and pocket bonus wager authorized by Section 6 of the Authorized Rules of the Game for Heads Up Hold 'em, shall be placed in a separate designated betting area at each betting position for the placement of each wager as follows:

(i) The odds wager designated betting area shall be to the right of and aligned with the ante wager;

(ii) The trips plus wager designated betting area shall be in front of the ante wager;

(iii) The pocket bonus wager designated betting area shall be to the right of and aligned with the trips plus designated betting area, and in front of the odds wager designated betting area;

(d) Heads Up Hold 'em tables shall have inscriptions that advise patrons of the payout odds of the odds wager, bad beat bonus, trips plus wager, and pocket bonus wager authorized as described in Section 11 of the Authorized Rules of the Game for Heads Up Hold 'em, respectively; and inscriptions that advise patrons of the permissible raise wagers.

(3) Each Heads Up Hold 'em table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

146.62: High Card Flush; physical characteristics

(1) High Card Flush shall be played at a table having betting positions for no more than six players on one side of the table and a place for the dealer on the opposite side.

(2) A true-to-scale rendering and color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a High Card Flush table shall contain, at a minimum:

- a) The name or trade name of the gaming licensee;
- b) A separate designated betting area at each betting position for the placement of the ante wager;
- c) A separate designated betting area located immediately in front of each ante wager betting area for the placement of the raise wager;
- d) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager authorized by Section 6 of the Authorized Rules of the Game for High Card Flush, a separate designated betting area at each betting position for the placement of each wager, which shall be located behind each ante wager betting area;
- e) If a gaming licensee offers the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager authorized by Section 6 of the Authorized Rules of the Game for High Card Flush, inscriptions that advise patrons of the payout odds for the Flush Bonus wager, the Straight Flush Bonus wager, and/or the Progressive payout wager, as described in Section 11 of the Authorized Rules of the Game for High Card Flush.
- f) Inscriptions that advise patrons of the permissible raise wagers, as described Section 6 of the Authorized Rules of the Game for High Card Flush; and;
- g) Inscriptions that advise patrons of the dealer's qualifying hand, as described in Section 1 of the Authorized Rules of the Game for High Card Flush.

(3) Each High Card Flush table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(4) If a gaming licensee offers the Progressive payout wager authorized by Section 6 of the Authorized Rules of the Game for High Card Flush., each High Card Flush table shall be equipped with an approved table game progressive payout wager system for the placement of Progressive payout wagers, equipped with additional approved features or standards including, but not limited to, those required pursuant to 205 CMR 143.02.

DRAFT



STANDARD SERIES

GLI-25:

Dealer Controlled Electronic Table Games

Version: 1.2

Release Date: September 6, 2011



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ABOUT THIS STANDARD

This Standard has been produced by **Gaming Laboratories International, LLC** for the purpose of providing independent certifications to suppliers under this Standard and complies with the requirements set forth herein.

A supplier should submit equipment with a request that it be certified in accordance with this Standard. Upon certification, Gaming Laboratories International, LLC will provide a certificate of compliance evidencing the certification to this Standard.

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CHAPTER 1

1.0 STANDARD OVERVIEW

1.1 Introduction

1.1.1 General Statement. Gaming Laboratories International, LLC (GLI) has been testing gaming equipment since 1989. Over the years, we have developed numerous standards for jurisdictions all over the world. In recent years, many jurisdictions have opted to ask for the development of industry standards without creating their own standards documents. In addition, with technology changing almost monthly, new technology is not being incorporated quickly enough into existing standards due to the long process of administrative rulemaking. This document, *GLI Standard 25*, will set forth the technical Standards for Dealer Controlled Electronic Table Games (ETG).

1.1.2 Document History. This document is an essay from many standards documents from around the world. Some GLI has written; some, such as the Australian and New Zealand National Standard, were written by Industry Regulators with input from test laboratories and electronic table game manufacturers. We have taken each of the standards' documents, merged each of the unique rules together, eliminating some rules and updating others, in order to reflect both the change in technology and the purpose of maintaining an objective, factual standard. We have listed below, and given credit to, agencies whose documents we reviewed prior to writing this Standard. It is the policy of **Gaming Laboratories International, LLC** to update this document as often as possible to reflect changes in technology, testing methods, or cheating methods. This document will be distributed without charge to all those who request it. It may be obtained by downloading it from our website at www.gaminglabs.com or by writing to us at:

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1.2 Purpose of Technical Standards

1.2.1 General Statement. The Purpose of this Technical Standard is as follows:

- a) To eliminate subjective criteria in analyzing and certifying Dealer Controlled Electronic Table Games.
- b) To only test those criteria that impact the credibility and integrity of Dealer Controlled Electronic Table Games from both the Revenue Collection and Player’s perspective.
- c) To create a standard that will ensure that the Dealer Controlled Electronic Table Games are fair, secure, and able to be audited and operated correctly.
- d) To distinguish between local public policy and laboratory criteria. At GLI, we believe that it is up to each local jurisdiction to set public policy with respect to gaming.
- e) To recognize that non-gaming testing (such as Electrical Testing) should not be incorporated into this standard but left to appropriate test laboratories that specialize in that type of testing. Except where specifically identified in the standard, testing is not directed at health or safety matters. These matters are the responsibility of the manufacturer, purchaser, and operator of the equipment.
- f) To construct a standard that can be easily changed or modified to allow for new technology.
- g) To construct a standard that does not specify any particular method or algorithm. The intent is to allow a wide range of methods to be used to conform to the standards, while at the same time, to encourage new methods to be developed.

1.2.2 No Limitation of Technology. One should be cautioned that this document should not be read in such a way that limits the use of future technology. The document should not be interpreted that if the technology is not mentioned, then it is not allowed. Quite to the contrary, as new technology is developed, we will review this standard, make changes and incorporate new minimum standards for the new technology.

1.3 Other Documents That May Apply

1.3.1 General Statement. The following other GLI standards may apply, depending on the features of the electronic table game and references throughout this document. All GLI standards are available on our website at www.gaminglabs.com:

- a) GLI-11 Gaming Devices in Casinos;
- b) GLI-12 Progressive Gaming Devices in Casinos;
- c) GLI-13 On-Line Monitoring and Control Systems (MCS) and Validation Systems in Casinos;
- d) GLI-16 Cashless Systems in Casinos;
- e) GLI-17 Bonusing Systems in Casinos; and
- f) GLI-18 Promotional Systems in Casinos.

NOTE: This standard covers the Technical Specifications of the operation of Dealer Controlled Electronic Table Games, as defined within section 1.4.1 below, where the table games are operated electronically, that require interaction from a live dealer. Please refer to GLI-24 for Electronic Table Game Systems that do not utilize a live dealer.

1.4 Defining Dealer Controlled Electronic Table Games

1.4.1 General Statement. Dealer Controlled Electronic Table Games (ETG) is the operation of a table game(s) that require a live dealer that utilizes electronics as part of the game's operation (i.e., game generation, electronically collecting, storing, communicating accounting and significant event data, etc.) **This standard is only to be used when the electronic table game requires a live dealer. This standard will not make assumptions as to the classification of a device in a particular jurisdiction as being a table game or a gaming device, as defined within the GLI-11 Gaming Devices in Casinos standard. Nor does GLI offer an opinion as to how many 'devices' the equipment encompasses.**

NOTE: For table game systems that do not utilize a live dealer please refer to the GLI Standard 24.

1.5 Phases of Testing

1.5.1 General Statement. Electronic table game submissions to the Test Laboratory may be performed in two phases:

- a) Within the laboratory setting; and
- b) On-site following the initial install of the system to ensure proper configuration of the security applications.

NOTE: In addition to the on-site testing of the system, the Test Laboratory shall provide training on this new technology to the local regulators, recommended field auditing procedures, and assistance with the compilation of Internal Controls, if requested.

CHAPTER 2

2.0 *ELECTRONIC TABLE GAME SYSTEM REQUIREMENTS*

2.1 Introduction

This chapter addresses electronic table game's that may or may not function as a component within a table game system. The regulations of each subchapter only apply when the electronic table game(s) operate as part of a „table game system“ that is independent of any external gaming system. Electronic table game's that operate in conjunction with external systems shall meet the game level and communication requirements established within the appropriate GLI Standard.

2.2 Table Game System Requirements

2.2.1 System Clock. The system must maintain an internal clock that reflects the current time (24hr format - which is understood by the local date/time format) and date that shall be used to provide for the following:

- a) Time stamping of significant events;
- b) Reference clock for reporting; and
- c) Time stamping of configuration changes.

2.2.2 Synchronization Feature. If multiple clocks are supported the system shall have a facility whereby it is able to synchronize those clocks in each system component, whereby conflicting information could not occur.

2.3 System Security

2.3.1 General Statement. All communications, including Remote Access, must pass through at least one approved application-level firewall and must not have a facility that allows for an alternate network path.

2.3.2 Firewall Audit Logs. The firewall application must maintain an audit log of the following information and must disable all communications and generate an error event if the audit log becomes full:

- a) All changes to configuration of the firewall;
- b) All successful and unsuccessful connection attempts through the firewall; and
- c) The source and destination IP Addresses, Port Numbers and MAC Addresses.

2.3.3 Surveillance/Security Functionality. The system shall provide for interrogation that enables on-line comprehensive searching of the significant event log.

2.3.4 Access Control. The system must support either a hierarchical role structure whereby user name and password define program access or individual menu item access or logon program /device security based strictly on user name and password or PIN. The system shall not permit the alteration of any significant log information without supervised access control. There shall be a provision for system administrator notification and user lockout or audit trail entry, after a set number of unsuccessful login attempts. The system shall record: Date and Time of the Login attempt, username supplied, and success or failure. The use of generic user accounts on servers is not permitted.

2.3.5 Data Alteration. The system shall not permit the alteration of any accounting or significant event log information without supervised access controls. In the event financial data is changed, an audit log must be capable of being produced to document:

- a) Data element altered;

-
- b) Data element value prior to alteration;
 - c) Data element value after alteration;
 - d) Time and Date of alteration; and
 - e) Personnel that performed alteration (user login).

2.4 Remote Access

2.4.1 Remote Access defined. Remote access defines any access made by a component outside the „trusted“ network.

2.4.2 General Statement. Remote access where permitted, shall authenticate all computer systems based on the authorized settings of the electronic table game and firewall application that establishes a connection with the electronic table game as long as the following requirements are met:

- a) Remote Access User Activity log is maintained by both the property and the manufacturer, depicting: authorized by, purpose, logon name, time/date, duration, and activity while logged in;
- b) No unauthorized remote user administration functionality (adding users, changing permissions, etc.);
- c) No unauthorized access to database;
- d) No unauthorized access to operating system; and
- e) If remote access is to be on a continuous basis then a network filter (firewall) must be installed to protect access (Dependent upon jurisdictional approval).

2.4.3 Self Monitoring. The system must implement self monitoring of all critical Interface Elements (e.g. central hosts, network devices, firewalls, links to third parties, etc.) and shall have the ability to effectively notify the system administrator of any error condition, provided the condition is not catastrophic. The system shall be able to perform this operation with a frequency of at least once in every 24-hour period and during each power-up and power reset.

2.5 Backups and Recovery

2.5.1 System Redundancy, Backup & Recovery. The system shall have sufficient redundancy and modularity so that if any single component or part of a component fails, gaming can continue. There shall be redundant copies of each log file or system database or both on the system with open support for backups and restoration.

2.5.2 Backup & Recovery. In the event of a catastrophic failure when the system cannot be restarted in any other way, it shall be possible to reload the system from the last viable backup point and fully recover the contents of that backup, recommended to consist of at least the following information:

- a) Significant events;
- b) Accounting information;
- c) Auditing information; and
- d) Specific site information such as Device file, Employee file, game profiles, etc.

2.6 Communication Protocol

2.6.1 General Statement. Each component of an electronic table game system must function as indicated by the communication protocol implemented. All protocols must use communication techniques that have proper error detection and/or recovery mechanisms which are designed to prevent unauthorized access or tampering, employing Data Encryption Standards (DES) or equivalent encryption with secure seeds or algorithms. Any alternative measures will be reviewed on a case-by-case basis, with regulator approval.

2.7 System Integrity

2.7.1 General Statement. The Laboratory will perform certain tests to determine whether or not outside influences affect game fairness to the player or create cheating opportunities. This certification applies exclusively to tests conducted using current and retrospective methodology developed by Gaming Laboratories International, LLC (GLI). During the course of testing, GLI inspects for marks or symbols indicating that a device has undergone product safety compliance testing. Gaming Laboratories International, LLC also performs, where possible, a cursory review of submissions and information contained therein related to Electromagnetic Interference (EMI), Radio Frequency Interference (RFI), Magnetic Interference, Liquid Spills, Power Fluctuations and Environmental conditions. Electrostatic Discharge Testing is intended only to simulate techniques observed in the field being used to attempt to disrupt the integrity of electronic table game systems. Compliance to any such regulations related to the aforementioned testing is the sole responsibility of the device manufacturer. GLI claims no liability and makes no representations with respect to such non-gaming testing. An electronic table game system shall be able to withstand the following tests, resuming game play without operator intervention:

- a) Random Number Generator. If implemented, the random number generator and random selection process shall be impervious to influences from outside the device, including, but not limited to, electro-magnetic interference, electro-static interference, and radio frequency interference;
- b) Electro-Static Interference. Protection against static discharges requires that the table game's conductive cabinets be earthed in such a way that static discharge energy shall not permanently damage, or permanently inhibit the normal operation of the electronics or other components within the electronic table game. The electronic table game may exhibit temporary disruption when subjected to a significant electro-static discharge greater than human body discharge, but they shall exhibit a capacity to recover and complete any interrupted play without loss or corruption of any control or critical data information associated with the electronic table game. The tests will be conducted with a severity level of a maximum of 27KV air discharge;

2.7.2 Physical Security. The server or system component(s) must reside in a secure area where access is limited to authorized personnel. It is recommended that logical access to the game be logged on the system or on a computer or other logging device that resides outside the secure area and is not accessible to the individual(s) accessing the secure area. The logged data should include the time, date, and the identity of the individual accessing the secure area. The resulting logs should be kept for a minimum of 90 days.

2.8 Random Number Generator

2.8.1 General Statement. The Random Number Generator (RNG) is the selection of game symbols or production of game outcomes. The regulations within this section are only applicable to electronic table games that utilize an RNG, which shall:

- a) Be statistically independent;
- b) Conform to the desired random distribution;
- c) Pass various recognized statistical tests; and
- d) Be unpredictable.

2.8.2 Game Selection Process.

- a) All Combinations and Outcomes Shall Be Available. Each possible permutation or combination of game elements that produces winning or losing game outcomes shall be available for random selection at the initiation of each play, unless otherwise denoted by the game.
- b) No Near Miss. After selection of the game outcome, the electronic table game shall not make a variable secondary decision, which affects the result shown to the player. For instance, the random number generator chooses an outcome that the game will be a loser.
- c) No Corruption from Associated Equipment. An electronic table game shall use appropriate protocols that effectively protect the random number generator and random

selection process from influence by associated equipment, which may be communicating with the electronic table game.

2.8.3 Applied Tests. The test laboratory may employ the use of various recognized tests to determine whether or not the random values produced by the random number generator pass the desired confidence level of 99%. These tests may include, but are not limited to:

- a) Chi-square test;
- b) Equi-distribution (frequency) test;
- c) Gap test;
- d) Overlaps test;
- e) Poker test;
- f) Coupon collector's test;
- g) Permutation test;
- h) Kolmogorov-Smirnov test;
- i) Adjacency criterion tests;
- j) Order statistic test;
- k) Runs tests (patterns of occurrences should not be recurrent);
- l) Interplay correlation test;
- m) Serial correlation test potency and degree of serial correlation (outcomes should be independent of the previous game);
- n) Tests on subsequences; and
- o) Poisson distribution.

2.8.4 Background RNG Activity. The RNG shall be cycled continuously in the background between games and during game play at a speed that cannot be timed by the player. The test laboratory recognizes that some time during the game, the RNG may not be cycled when interrupts may be suspended. The test laboratory recognizes this but shall find that this exception shall be kept to a minimum.

2.8.5 RNG Seeding. The first seed shall be randomly determined by an uncontrolled event. After every game there shall be a random change in the RNG process (new seed, random timer, delay, etc.). This will verify the RNG doesn't start at the same value, every time. It is permissible not to use a random seed; however, the manufacturer must ensure that games will not synchronize.

2.8.6 Live Game Correlation. Unless otherwise denoted on the pay glass/display, where the electronic table game plays a game that is recognizable such as Poker, Blackjack, Roulette, etc., the same probabilities associated with the live game shall be evident in the simulated game. For example, the odds of getting any particular number in Roulette where there is a single zero (0) and a double zero (00) on the wheel, shall be 1 in 38; the odds of drawing a specific card or cards in Poker shall be the same as in the live game.

2.8.7 Card Games. The requirements for games depicting cards being drawn from a deck are the following:

- a) At the start of each game/hand, the cards shall be drawn fairly from a randomly-shuffled deck; the replacement cards shall not be drawn until needed, and in accordance with game rules, to allow for multi-deck and depleting decks;
- b) Cards once removed from the deck shall not be returned to the deck except as provided by the rules of the game depicted;
- c) As cards are removed from the deck they shall be immediately used as directed by the rules of the game (i.e., the cards are not to be discarded due to adaptive behavior by the electronic table game system)

*NOTE: It is acceptable to draw **random numbers** for replacement cards at the time of the first hand random number draw. Provided the replacement cards are sequentially used as needed.*

2.9 Maintenance of Critical Memory

2.9.1 General Statement. Critical memory storage may be maintained by the player terminal or the system, where applicable. Critical memory shall be maintained by a methodology that enables errors to be identified. This methodology may involve signatures, checksums, partial checksums, multiple copies, timestamps and/or effective use of validity codes.

Note: The “Maintenance of Critical Memory” section is not intended to preclude the use of alternate storage media types, such as hard disk drives, for the retention of critical data. Such alternate storage media is still expected to maintain critical data integrity in a manner consistent with the requirements in this section, as applicable to the specific storage technology implemented.

2.9.2 Comprehensive Checks. Comprehensive checks of critical memory shall be made following game initiation but prior to display of game outcome to the player. It is recommended that critical memory is continuously monitored for corruption. Test methodology shall detect failures with an extremely high level of accuracy.

2.9.3 Unrecoverable Critical Memory. An unrecoverable corruption of critical memory shall result in an error. The memory error shall not be cleared automatically and shall result in a tilt condition, which facilitates the identification of the error and causes the electronic table game to cease further function. *The critical memory error shall also cause any communication external to the electronic table game to immediately cease.* An unrecoverable critical memory error shall require a full non-volatile memory clear performed by an authorized person.

2.9.4 Non-volatile Memory and Program Storage Device Space. Non-volatile memory space that is not critical to the electronic table game operations are not required to be validated.

2.10 Program Storage Device Requirements

2.10.1 General Statement. The term *Program Storage Device* is defined to be the media or an electronic device that contains the critical control program components. Device types include

but are not limited to EPROMs, compact flash cards, optical disks, hard drives, solid state drives, USB drives, etc. This partial list may change as storage technology evolves. All program storage devices shall:

- a) Be housed within a fully enclosed and locked logic compartment;
- b) Be clearly marked with sufficient information to identify the software and revision level of the information stored in the device. In the case of media types on which multiple programs may reside it is acceptable to display this information via the attendant menu.
- c) Validate themselves during each processor reset;
- d) Validate themselves the first time they are used; and
- e) CD-ROM, DVD, and other optical disk-based Program Storage shall:
 - i. Not be a re-writeable disk; and
 - ii. The “Session” shall be closed to prevent any further writing.

2.11 Control Program Requirements

2.11.1 Control Program Verification.

- a) EPROM-based Program Storage:
 - i. Electronic table games which have control programs residing in one or more EPROMs must employ a mechanism to verify control programs and data. The mechanism must use at a minimum a checksum; however, it is recommended that a Cyclic Redundancy Check (CRC) be used (at least 16-bit).
- b) Non-EPROM Program Storage shall meet the following rules:
 - i. The software shall provide a mechanism for the detection of unauthorized and corrupt software elements, upon any access, and subsequently prevent the execution or usage of those elements by the electronic table game. The mechanism must employ a hashing algorithm which produces a message digest output of at least 128 bits.

-
- ii. In the event of a failed authentication, after the game has been powered up, the electronic table game should immediately enter an error condition and display an appropriate error. This error shall require operator intervention to clear and shall not clear until; the data authenticates properly, following the operator intervention, or the media is replaced or corrected, and the electronic table game's memory is cleared.

NOTE: Control Program Verification Mechanisms may be evaluated on a case-by-case basis and approved by the regulator and the independent testing laboratory based on industry standard security practices.

- c) Alterable Media shall meet the following rules in addition to the requirements outlined in 2.11.1(b):
 - i. Employ a mechanism which tests unused or unallocated areas of the alterable media for unintended programs or data and tests the structure of the media for integrity. The mechanism must prevent further play of the electronic table game if unexpected data or structural inconsistencies are found.
 - ii. Employ a mechanism for keeping a record anytime a control program component is added, removed, or altered on any alterable media. The record shall contain a minimum of the last ten (10) modifications to the media and each record must contain that date and time of the action., identification of the component affected, the reason for the modification and any pertinent validation information.

NOTE: Alterable Program Storage does not include memory devices typically considered to be alterable which have been rendered "read-only" by either a hardware or software means.

2.11.2 Program Identification. Program storage devices which do not have the ability to be modified while installed in the electronic table game during normal operation, shall be clearly marked with sufficient information to identify the software and revision level of the information stored in the devices.

2.11.3 Independent Control Program Verification. The system server(s) and each component of the electronic table game that would have an effect on the integrity of the electronic table game shall have the ability to allow for an independent integrity check of the device’s software from an outside source and is required for all control programs that may affect the integrity of the game. This must be accomplished by being authenticated by a third-party device, which may be embedded within the game software (see NOTE below), by having an interface port for a third-party device to authenticate the media, or by allowing for removal of the media such that it can be verified externally. This integrity check will provide a means for field verification of the software to identify and validate the program. The test laboratory, prior to device approval, shall evaluate the integrity check method.

NOTE: If the authentication program is contained within the game software, the manufacturer must receive written approval from the test laboratory prior to submission.

2.12 Player Interface Terminal Requirements

2.12.1 General Statement. Player interface terminals may either be a display mechanism where the system performs all operations of the game (Thin Client), or contain its own logic function in conjunction with the electronic table game system (Thick Client). In either case, the player interface terminal(s) must meet the hardware and software requirements outlined within each jurisdiction’s applicable requirements for gaming devices, to ensure security and player safety. In the absence of these jurisdictional specific requirements, the GLI-11 requirements should be used.

NOTE: Requirements that cannot be met as a result of manual intervention performed by the live dealer must be addressed in operational procedures and submitted to the Test Laboratory.



STANDARD SERIES

GLI-29:

Card Shufflers and Dealer Shoes

Version: 1.0

Release Date: July 20, 2012



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ABOUT THIS STANDARD

This Standard has been produced by **Gaming Laboratories International, LLC** for the purpose of providing independent certifications to suppliers under this Standard and complies with the requirements set forth herein.

A supplier should submit equipment with a request that it be certified in accordance with this Standard. Upon certification, Gaming Laboratories International, LLC will provide a certificate of compliance evidencing the certification to this Standard.

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CHAPTER 1

1.0 STANDARD OVERVIEW

1.1 Purpose

1.1.1 General Statement. Gaming Laboratories International, LLC (GLI) has been testing gaming equipment since 1989. Over the years, we have developed numerous standards for jurisdictions all over the world. In recent years, many jurisdictions have opted to ask for technical standards without creating their own standards. In addition, with technology changing almost monthly, new technology is not being incorporated quickly enough into existing standards due to the long process of administrative rulemaking. This document, *GLI Standard 29*, will set forth the technical Standards for Card Shufflers and Card Shoes.

This standard and all others may be obtained by downloading it from our website at www.gaminglabs.com or by writing to us at:

Gaming Laboratories International, LLC

600 Airport Road
Lakewood, NJ 08701
(732) 942-3999 Tel
(732) 942-0043 Fax

1.2 Acknowledgment of Other Standards Reviewed

1.2.1 General Statement. These Standards have been developed by reviewing and using portions of the documents from the organizations listed below. We acknowledge the regulators who have assembled these documents and thank them:

- a) The Singapore Casino Regulatory Authority;
- b) The Manitoba Gaming Control Commission;
- c) The Pennsylvania Gaming Control Board;
- d) The New Jersey Division of Gaming Enforcement;
- e) The Colorado Division of Gaming;
- f) The Arizona Department of Gaming;

1.3 Purpose of Technical Standards

1.3.1 General Statement. The Purpose of this Technical Standard is as follows:

- a) To eliminate subjective criteria in analyzing and certifying Card Shufflers and Dealer Shoes.
- b) To establish the minimum integrity standards for card shufflers and card shoes that are technology neutral.
- c) To only test those criteria that impact the credibility and integrity of Card Shufflers and Dealer Shoes from both the revenue collection and player's play point of view.
- d) To create a standard that will ensure that the card shufflers and dealer shoes are fair, secure, and able to be audited and operated correctly.
- e) To distinguish between local public policy and laboratory criteria. At GLI, we believe that it is up to each local jurisdiction to set their own public policy with respect to gaming.
- f) To recognize that non-gaming testing (such as electrical testing) should not be incorporated into this standard but left to appropriate test laboratories that specialize in that type of testing.
- g) Except where specifically identified in the standard, testing is not directed at health or safety matters. These matters are the responsibility of the manufacturer, purchaser, and operator of the equipment.
- h) To construct a standard that can be easily changed or modified to allow for new technology.
- i) To construct a standard that does not specify any particular method or algorithm. The intent is to allow a wide range of methods to be used to conform to the standards, while at the same time, to encourage new methods to be developed.

1.3.2 No Limitation of Technology. One should be cautioned that this document should not be read in such a way that limits the use of future technology. The document should not be interpreted that if the technology is not mentioned, then it is not allowed. Quite to the contrary, as new technology is developed, we will review this standard, make changes and incorporate new minimum standards for the new technology.

1.4 Other Documents That May Apply

1.4.1 Other Standards. The following other GLI standards may apply, depending on the features of the Card Shufflers and Dealer Shoes and references throughout this document. All GLI standards are available on our website at www.gaminglabs.com:

- a) GLI-11 Gaming Devices in Casinos;
- b) GLI-24 Electronic Table Games Systems
- c) GLI-25 Dealer Controlled Electronic Table Systems

1.5 Card Shuffler and Card Shoe Terminology – Definitions

1.5.1 Definitions.

- a) Card Shuffler. A device that is designed, at a minimum, to have the capability to randomly rearrange a deck or decks of playing cards to eradicate any patterns introduced to the playing cards upon initial use or by prior game play.
- b) Shuffle. A procedure used to randomize a deck of playing cards to provide an element of chance in card games.
- c) Card Shoe or Dealer Shoe. A device used to hold playing cards for distribution by a dealer to each player of a card game.
- d) Program Storage Device. The media or an electronic device that contains the critical control program components.
- e) Role Based Access Control. Software control which allows different levels of access depending on the person accessing the device. For example, a dealer may only be able to access game history where a pit boss may be able to also access the device's configuration menus.

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CHAPTER 2

2.0 SOFTWARE REQUIREMENTS

2.1 Random Number Generator (RNG) Requirements

2.1.1 Random Number Generator Requirements. The RNG and the physical mechanics of the shuffling device will mutually result in the production of random card outcomes. The results of multiple random card outcomes will be evaluated. The outcome shall:

- a) Be statistically independent;
- b) Conform to the desired random distribution;
- c) Pass various recognized statistical tests; and
- d) Be unpredictable.

2.1.2 Applied Tests. The test laboratory may employ the use of various recognized tests to determine whether or not the random values produced by the random number generator pass the desired confidence level of 99%. These tests may include, but are not limited to:

- a) Chi-square test;
- b) Overlaps test;
- c) Poker test;
- d) Coupon collector's test;
- e) Permutation test;
- f) Adjacency criterion tests;
- g) Runs tests (patterns of occurrences should not be recurrent);
- h) Interplay correlation test;
- i) Serial correlation test potency and degree of serial correlation (outcomes should be independent of the previous game).

2.1.3 Background RNG Activity Requirement. The RNG shall be cycled continuously in the background between shuffles at a speed that cannot be timed by the player.

2.1.4 RNG Seeding. The first seed shall be randomly determined by an uncontrolled event. After every game there shall be a random change in the RNG process (new seed, random timer, delay, etc.). This will verify the RNG doesn't start at the same value, every time. Alternatively, it is permissible not to use a random seed; however, the manufacturer must ensure that shuffles will not synchronize. The test laboratory shall approve any alternative method utilized.

2.1.5 Scaling Algorithms.

- a) If a random number with a range shorter than that provided by the RNG is required for some purpose within the device, the method of scaling, (i.e., converting the number to the lower range), is to be designed in such a way that all numbers within the lower range are equally probable.
- b) If a particular random number selected is outside the range of equal distribution of scaling values, it is permissible to discard that random number and select the next in sequence for the purpose of scaling.

2.2 Non-Volatile (NV) Memory Requirements

2.2.1 General Statement. NV memory is used to store all data that is considered vital to the continued operation of the gaming device. The contents of NV memory may include, but is not limited to shuffling device configuration data (i.e. number of decks being used, different shuffle methods, etc.) and game configuration data (i.e. the type of game – Poker, Blackjack, etc. being played and any variant of the game – Draw Poker, Stud Poker, etc.).

2.2.2 Maintenance. NV memory storage shall be maintained by a methodology that enables errors to be identified and corrected in most circumstances. This methodology may include, but is not limited to signatures, checksums, partial checksums, multiple copies, and effective use of validity codes.

2.2.3 Comprehensive Checks. Comprehensive checks of NV memory shall be made following the initiation of the shuffling process, but prior to the start of the shuffle and upon completion of the shuffle prior to the cards being used for game play. The methodology shall detect failures with an extremely high level of accuracy.

2.2.4 Unrecoverable NV Memory. An unrecoverable corruption of NV memory shall result in an NV memory error. Upon detection, the device shall meet the requirements as specified in section 2.7, Program Interruption & Resumption, of this standard.

2.2.5 Non-Critical Memory Space. NV memory space that is not critical to the gaming device's security is not required to be validated.

2.3 Program Storage Device (PSD) Requirements

2.3.1 General Statement. All program storage devices shall:

- a) Be secured behind a fully closed door, panel, or compartment so that it is not openly accessible and shall meet the requirements as specified in section 2.8, Cover/Lid Open/Close, of this standard.
- b) Contain sufficient information to identify the software and revision level of the information stored on the device, which may include but is not limited to physical labels or, if applicable, electronically stored and displayed via a display screen.

NOTE: The process used in the identification of the software and revision level will be evaluated on a case-by-case basis.

- c) Contain information to allow the device to validate the contents of the program storage device upon:
 - i. Power up after initial installation; and
 - ii. Processor reset.

2.3.2 Non-Critical PSD Space. PSD space that is not critical to the gaming device's security is not required to be validated.

2.4 Control Program Requirements

2.4.1 General Statement. Each device shall contain a proven and robust mechanism which has the capability to internally authenticate the program files prior to use or loading. The control program shall ensure the integrity of all controlled program components during execution of said components. Control programs shall test themselves for possible corruption due to failure of the program storage media.

2.4.2 Authentication Method. It is recommended that the device utilize an integrity check method with a secured hashing algorithm of at least 128 bits (i.e. MD5). However, Cyclic Redundancy Check (CRC) calculations must be used at a minimum (at least 16 bit). The test laboratory shall approve any other methodologies implemented.

2.4.3 Authentication Mismatch. If unexpected data or inconsistencies are found, the device shall meet the requirements as specified in section 2.6, Error Conditions, of this standard.

2.4.4 Independent Control Program Verification. The device shall have the ability to allow for an independent integrity check of the device's software from an outside source and is required for all control programs that may affect the integrity of the device. This must be accomplished by being authenticated by a third-party device, which may be embedded within the shuffler software (see NOTE below), by having an interface port for a third-party device to authenticate the media, or by allowing for removal of the media such that it can be verified externally. This integrity check will provide a means for field verification of the software to identify and validate the program. The test laboratory, prior to device approval, shall approve the integrity check method.

NOTE: If the authentication program is contained within the device software, the manufacturer must receive written approval from the test laboratory prior to submission.

2.5 Communications Protocol

2.5.1 General Statement. For devices that are required to communicate with another system (e.g. prior game result display device, electronic card table, etc.), the device must accurately function as indicated by the communication protocol that is implemented.

2.5.2 Display of Game Results. For devices that have the capability to communicate results of the game with another device or system (e.g. prior game result display device, electronic card table, etc), it shall do so with a very high degree of accuracy.

NOTE: If any inaccuracy occurs, a dealer override feature may be permissible to correct the inaccuracy. If the device does not support a dealer override feature, then the device must meet the requirements as specified in section 2.6, Error Conditions, of this standard.

NOTE: Please refer to GLI-24 – Electronic Table Game Systems, and GLI-25 - Dealer Controlled Electronic Table Systems for additional regulations, as applicable.

2.5.3 Protection of Sensitive Information. The device must not allow any information contained in communication to or from another system that is intended by the communication protocol to be protected, or which is of a sensitive nature, to be viewable through any display mechanism supported by the device. This includes, but is not limited to validation information, secure PINs, credentials, or secure seeds and keys.

2.6 Error Conditions

2.6.1 General Statement. Shuffling devices shall be capable of detecting error conditions which shall cause the device to lock up and there shall be an appropriate indicator (e.g. audible alarm or light) to notify the operator. If a display screen is present, a message describing the type of error shall be displayed.

2.7 Program Interruption & Resumption

2.7.1 Interruption. After a program interruption (e.g., processor reset, or any error condition), the shuffling device shall enter a lock-up condition and the shuffle or deal shall be nullified. Upon detection, the device shall meet the requirements as specified in section 2.6, Error Conditions, of this standard.

2.7.2 Restoring Power. If the shuffling device is powered down while in an error condition, then upon restoring power, the specific error message shall still be displayed and the gaming device shall remain locked-up. This is unless power down is used as part of the error reset procedure, or if on power up or cover/lid closure, the gaming device checks for the error condition and detects that the error is no longer in existence.

2.7.3 Simultaneous Inputs. The program shall not be adversely affected by the simultaneous or sequential activation of the various inputs and outputs, which might, whether intentionally or not, cause malfunctions or invalid results.

2.7.4 Resumption. Upon program resumption, the device shall meet the requirements as specified in section 2.4, Control Program Requirements, of this standard.

2.8 Cover/Lid Open/Close

2.8.1 Cover/Lid Open Procedures. There shall be mechanisms in place to detect the opening of the cover, lid, or access to any other critical portion of the shuffling device which may affect the integrity and the security of the unit. Upon detection, the device shall meet the requirements as specified in section 2.6, Error Conditions, of this standard. Critical portions of the shuffling device include, but are not limited to, areas that contain:

- a) The program storage media; and
- b) The cards after the shuffling process has been initialized.

2.9 Levels of Certification

2.9.1 General Statement. All devices must pass the requirements set forth as specified in sections 2.1 through 2.8. In addition, each shuffling device must meet the requirements under, at least, one (1) of the sections as specified below. A shuffling device may qualify as being compliant with multiple levels of certification if it meets the requirements of more than one (1) of the sections as specified below.

2.9.2 Type 3 Certification. The shuffling device must pass Section 2.1.2, Applied Tests, where the statistical tests applied shall consider each card uniquely even though they may be considered indistinguishable to the player (i.e. each card will be treated as a unique card).

NOTE: Due to the inherent mechanical limitations of shuffling devices, if the submission components do not meet the requirements set forth in this section, the requirements for Type 2 Certification, below, will be applied, if allowed by the rules of the intended game(s) with which the device will be used.

2.9.3 Type 2 Certification. The shuffling device must pass Section 2.1.2, Applied Tests, where the statistical tests applied shall consider cards that are imperceptible to the player as indistinguishable (i.e. each card does not need to be treated as a unique card). For example, when shuffling eight standard 52-card decks, the ace of spades from the first deck is indistinguishable from the ace of spades from any of the other seven decks.

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CHAPTER 3

3.0 *DEVICE REQUIREMENTS*

3.1 **Hardware Requirements**

3.1.1 Device Identification. Each electronic shuffling device or card shoe shall bear, at minimum, the following information:

- a) The name of manufacturer;
- b) A unique serial number;
- c) The model number; and
- d) The date of manufacture.

3.1.2 Electro-Static Interference. Protection against static discharges requires that the electronic shuffler or card shoe device's conductive housing be earthed in such a way that static discharge energy shall not permanently damage, or permanently inhibit the normal operation of the electronics or other components within the device. The devices may exhibit temporary disruption when subjected to a significant electro-static discharge greater than human body discharge, but they shall exhibit a capacity to recover and complete any interrupted play without loss or corruption of any control or critical data information associated with the device. The tests will be conducted with a severity level of a maximum of 27KV air discharge.

3.1.3 Machine Safety. Electrical and mechanical parts and design principals of the device may not subject a person to any physical hazards. The gaming test laboratory shall not make any finding with regard to Safety and Electromagnetic Compatibility (EMC) testing, as that is the responsibility of the manufacturer of the goods or those that purchase the goods. Such Safety and EMC testing may be required under separate statute, regulation, law, or Act and should be researched accordingly, by those parties who manufacture or purchase said devices. The Gaming Test Laboratory shall not test for, be liable for, nor make a finding relating to these matters.

3.2 Device Functionality

3.2.1 Card Shuffler Functionality. Card shufflers must be designed so that:

- a) They can completely eradicate any pattern(s) introduced to the playing cards before being placed into the shuffler that would affect the outcome of the next game.
- b) Their operation cannot be interfered with or interrupted, other than by turning off the power, without being detected.
- c) During normal operation, the card shuffler must have the ability to dispense playing cards and not leave any marks, scuffs or abrasions, or cause any damage to the cards making any of the cards identifiable to the player.
- d) The card shuffler may not provide any real time information, for the current game being played, that can be used to aid in the:
 - i. Projection of the outcome of a game;
 - ii. Tracking of the cards played and cards remaining to be played;
 - iii. Analyzing the probability of the occurrence of an event relating to a game; or
 - iv. Analyzing the strategy for playing or betting to be used in a game.
- e) The card shuffler may utilize ancillary devices to assist in meeting the requirements in section 3.2.1 of this standard. Ancillary devices shall have no effect on the outcome of the shuffle or on the outcome of the cards being dealt.

NOTE: Ancillary devices shall perform according to the manufacturer's design and operating specifications.

3.2.2 Shoe Functionality. The requirements set forth in this section pertain to the specific portion of the device which is used for collecting cards to be distributed by a dealer to the players of the game. Shoes are devices that are designed and constructed to maintain the integrity of the game. There shall be mechanisms and controls in place to prevent the tampering of any card loaded into the card shoe. Card shoes, if supported, must be designed to:

- a) Facilitate the dealing of cards without revealing their face value.
- b) Have a cover that serves to obscure the back of the cards in the shoe.

NOTE: The back of the cards do not need to be completely obscured, but may be exposed to the extent necessary to permit the cards to be dealt from the shoe.

-
- c) Shall not leave any marking(s) on the cards that may assist, help or otherwise allow any person to predict or project the outcome of a game.
 - d) Shall not contain any hidden compartments.

3.2.3 Card Recognition. If card recognition software is used, it shall:

- a) Ensure a very high degree of accuracy in identifying the value and suit of the card.
- b) Not provide any information that may be used to compromise the cards contained in the current shuffle or dealing shoe.
- c) Not interfere with or modify the device's behavior beyond what functionality is associated with that software.
- d) If supported, have Role Based Access Control to restrict access to the history of game(s) played.

3.2.4 Card Count. If card count technology is used, the card shuffler must provide an accurate count.

NOTE: Card count in this section refers to the number of cards, not the technique or strategy known as 'card counting' utilized during card games, such as Blackjack.

3.2.5 Hand Formation. If cards dealt technology is used, then the device shall:

- a) Ensure all hands dealt meet section 2.1 Random Number Generator Requirements of this standard; and
- b) Ensure the correct number of playing cards per hand with a very high degree of accuracy to ensure that extra cards are not dealt to players.

3.2.6 Game History. If the device is capable of displaying the history of the game results, it shall do so with 100% accuracy.

NOTE: Voided rounds, due to any machine malfunction, are not required to be included in the game history.

3.2.7 Multi-Game. If the device is capable of shuffling or dealing more than one type of game, the device shall give an indication (i.e. if capable, display the game and variant on the display screen, sequence of lights, etc.) to the current game being shuffled or dealt.



April 5, 2017

MGC Comments
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Gaming Equipment

Dear Sir/Madam:

In response to the Massachusetts Gaming Commission's ("Commission") request for comments on proposed regulation 205 CMR 147.00, *Gaming Equipment*, please accept the following comments on behalf of Blue Tarp reDevelopment, LLC ("MGM Springfield"). MGM Springfield appreciates the opportunity to provide feedback on the regulation prior to commencing the formal regulation promulgation process.

The proposed Gaming Equipment Regulations ("Regulations") cover a number of topics including the specifications on chips, plaques, tables, wheels, dice and cards. The Regulations also provide for security and controls over certain equipment, chips and plaques. Finally, the Regulations include some additional rules associated with certain games. MGM Springfield recognizes that the goals of the Regulations include the integrity of the games, security and control of chips and plaques and a clear approval process for authorized games and the games' configuration. We believe that the Regulation's goals however, can likely be achieved in a more efficient and effective manner by reconfiguring the Regulation to be consistent with the Commission's recently approved *Uniform Standards of Rules of the Games* regulations including authorizing technical standards for all table game equipment that can be approved and amended outside of the formal regulatory process.¹

¹ When an agency issues rules, standards or other requirements of "general application," an agency typically promulgates regulations under G. L. c. 30A. See definition of regulation at G. L. c. 30A § 1(5). However, in circumstances where an agency's rules have a limited target group, agencies routinely use other forms of notice, manuals, guidelines to facilitate compliance. "These documents are usually specific and therefore do not meet the definition standard of regulation as having a 'general application.'" *Regulations Manual, Office of the Secretary of the Commonwealth State Publications and Regulation Division* (May 2016). In this case, the proposed regulations regarding the specifications for gaming equipment do not have "general application," but rather, are applicable to only Category 1 Licensees. Therefore, it is perfectly appropriate for the Commission to issue the table game equipment specifications outside of the formal rule making process.

There are multiple benefits to the Commission and Licensees through this alternative approach. This approach is consistent with the Commission's process for the approval and oversight of the table game rules. *See* 205 CMR 147.00. The table game rules contain a general framework for approval of the rules but provide for the publication of the actual game rules outside of the formal regulations. This allows for a dynamic structure where the highly technical rules for table games can be amended or supplemented by the Commission without a formal rulemaking process and without sacrificing notice and public input. In many ways, the proposed table game equipment specifications are inextricably intertwined with the table game rules. The proposed Regulations are peppered with references back to the rules. Changes to the game rules impact the table game specifications, including the approval of new games. Subjecting related matters to the same regulatory framework ensures the reasoned consistency of the Commission's regulations. More importantly, it also ensures the efficiencies and flexibilities gained by the Commission's approach to the table game rules is not lost due to a more burdensome approach to regulating the related table game equipment.

A dynamic regulatory structure that allows flexibility for the Licensees to make changes to its table game rules and table game equipment in an efficient manner is essential for maintaining a competitive environment for the Massachusetts Licensees and incenting innovation in table game rules and table game equipment. Licensees must have the flexibility to react to market conditions to ensure that they can meet customer demand. The approval process should be designed to encourage new offerings and avoiding obstacles to bringing such products to the market. Allowing a robust, yet efficient, process for changes to table game rules and table game equipment places the Massachusetts Licensees in the best position to succeed in a competitive region which includes operators with little or no state regulation.

Accordingly, MGM Springfield recommends redrafting the Regulation and adopting a framework similar to the table game rule regulation and incorporating a process for approval of table game equipment through "technical standards" similar to those used by the Nevada Gaming Control Board (NGCB). In Nevada, table game equipment standards are set by the NGCB through technical standards for such equipment. The table game specifications and characteristics are not promulgated as formal NGCB regulations. *See* NGCB Regulation 14.050, Technical Standards. Under this regulation, the Chairman of the NGCB is authorized to publish a technical standards manual that contains the specifications for table game equipment. Similar to the Commission's table game rule regulation, the NGCB must provide notice of the specifications and post the technical standards on the NGCB website. The Technical Standards Regulation in Nevada also has a process for approving changes to the standards that includes notice and opportunity for comments.

Thus, we respectfully request that the Commission take the following steps:

- Adopt the NGCB Technical Standards as a substitute to the current 205 CMR 146 as the Commission’s formal regulation. MGM Springfield recommends adding chips (value chips, nonvalue chips/promotional chips, poker chips and poker rake chips) and gaming plaques to the definition of gaming equipment² covered by the Technical Standards (Nevada has a separate regulation for Chips and Tokens).
- Move sections 146.03 through 146.53 and sections 146.58 through 146.62, the standards for table equipment for authorized games out of the Regulation and into a Gaming Equipment Technical Standards Manual or its equivalent.
- Move controls and security for chips and plaques contained in section 146.01 - 146.02 and 146.53 respectively to the existing internal control regulations, 205 CMR 138.00.
- Retain security and inspection protocols for table game equipment in the revised formal regulation as set forth in section 146.54 and section 146.56.

These changes will both ensure the integrity of table games in Massachusetts and provide a consistent approach to table game rules and table game equipment oversight and approvals while placing the Category 1 Licensees in the best position to compete and maximize revenue for the Commonwealth.

Thank you for your attention to this matter. MGM Springfield looks forward to working with the Commission further on the draft *Gaming Equipment* regulations.

Sincerely,



Seth N. Stratton

Vice President and Legal Counsel

62732729 v5

² See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.

<u>Category</u>	<u>Section</u>	<u>Quote From Standards</u>	<u>Scientific Games Feedback</u>
		General	<p><i>For Gaming Equipment related to Table Games as addressed in 205 CMR 146.00, SG recommends publishing the equipment specifications to a location on the MGC website just as how the “Rules of the Game” will be posted rather than within the regulation. In addition to this recommendation, we request consideration for a less constrained set of requirements when posted. As written, these regulations could potentially prevent certain podium style games from being approved.</i></p>
Table Games as relates to Hybrid ETG products	146.10; 146.13 through 146.62	<p>Regarding Table Game setup, positioning, and layouts.</p> <p>Example: “...played at a table having on one side places for the players and on the opposite side a place for the dealer”</p>	<p><i>Please consider a broader approach to table game layouts such that they do not unintentionally prevent compliant variants, such as podium style betting terminal layouts, from being approvable. If the Commission decides to proceed with this more defined set of requirements, we suggest also including an option for waiver. We believe it is reasonable for the Commission to make a determination of compliance for variants that meet the intent of the regulation.</i></p> <p><i>If the Commission is interested in a more detailed discussion regarding this comment, please contact SG to make arrangements.</i></p>
Table Games as it relates to Hybrid ETG products	146.10; 146.13 through 146.62	<p>(a) The name or trade name of the gaming licensee offering the game; and</p> <p>(b) Specific areas designated for the placement of wagers, which betting areas shall not exceed seven in number, with the exception of the 6 to 5 blackjack variation, which shall contain no more than six betting areas.</p>	<p><i>In support of the above comment, we would like to point out some limitations that may or may not impact approval of certain table game products. In a podium style layout, the individual betting terminals may not display the name/trade name. Would it be acceptable to limit this to the dealer table?</i></p> <p><i>While each podium is a specific betting area as implied in (b), use of the podiums in a stadium configuration could allow for many more than seven betting areas and still meet the intent of the regulation. Yet this configuration has no impact on the play or rules of the games being played.</i></p>

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 138: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES
AND INTERNAL CONTROLS

138.28: Gaming Day

A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall specify ~~what~~ the hours of operation for the gaming establishment and ~~what the~~ incorporate a 'gaming day' ~~will be~~ for accounting purposes **that begins at 6:00:00 a.m. and ends the following day at 5:59:59 a.m.** ~~Each gaming licensee may establish a gaming day for slot machines which is different from its gaming day for table games; provided, however, that no gaming day shall be longer than 24 hours.~~

138.33: Removal of Slot Drop Containers: Unsecured Currency Funds; Recording of Meter Readings for Slot Machine Drop

A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include procedures and protocols relative to the removal of slot drop containers, unsecured currency, and the recording of meter readings for slot machine drop that, at a minimum, incorporates the following requirements:

(7) Whenever currency, a gaming voucher, or a coupon is found inside a ~~bill-changer slot machine~~ but outside of the slot ~~cash-storage drop box (unsecured drop)~~ during the collection of slot ~~cash-storage drop~~ boxes **it shall be deemed "unsecured funds."** **When unsecured funds are located,** a count team member and a member of the casino security department shall complete and sign an **unsecured funds** form which includes the asset number in which the unsecured ~~drop-funds~~ **was were** found, the date the unsecured ~~drop-funds~~ **was were** found, and the total value of the unsecured ~~drop-funds~~. The unsecured ~~drop-funds~~ and the original **unsecured funds** form shall be transported to the count room. **A determination shall be made as to whether the unsecured funds registered on the coin-in meter of the slot machine from which they were retrieved. If the unsecured funds registered on the coin-in meter of the slot machine, the funds shall be counted as part of the gross gaming revenue for the slot machine and counted and recorded with the contents removed from the corresponding slot cash-storage drop box. If it is determined that the unsecured funds did not register on the coin-in meter of the slot machine, the funds shall be transferred along with the original and duplicate unsecured funds form to the cashiers' cage and processed as unclaimed cash in accordance with 205 CMR 138.68(1)(b). If after a count of the contents of a slot drop box it is determined that the total value of currency, gaming vouchers, and coupons is greater than the corresponding value indicated on the coin-in meter for the subject slot machine, the excess value shall be considered unsecured funds and the**

value shall be reflected on an unsecured funds form and transferred to the cashiers' cage and processed as unclaimed cash in accordance with 205 CMR 138.68(1)(b).

The duplicate of the unsecured funds form shall be placed in a locked accounting box. Upon completion of the count, the original unsecured funds form relative to funds that registered on the coin-in meter shall be placed in a locked accounting box located in the count room. The accounting department will shall retrieve the original form and reconcile it to the duplicate. A copy of the form shall be provided to the IEB.

(8) Whenever unsecured drop funds is are found inside a slot machine but outside of the slot drop box at times other than the collection of slot cash storage drop boxes, a slot department member shall notify the surveillance department and complete and sign the unsecured funds form referenced in 205 CMR 138.33(7). The unsecured drop funds and the original form shall be transported by the slot department member, escorted by a security department member, to the cashiers' cage where a cashier shall sign the form acknowledging receipt. The unsecured drop funds and original form shall be retained by the cashier, and the slot department member shall place the duplicate form in a locked accounting box. The accounting department shall reconcile the original form to the duplicate. handled in accordance with the process described in 205 CMR 138.33(7).

(9) Upon receipt of an unsecured gaming voucher or coupon, the cage cashier in the presence of the slot department member shall deface or otherwise deactivate the gaming voucher or coupon, to the extent necessary, so as to prevent subsequent redemption.

(10) At the end of the gaming day, at a minimum, the original unsecured drop funds forms and as applicable, gaming vouchers and coupons, shall be forwarded to the accounting department. The accounting department shall reconcile the original and duplicate forms and record the appropriate amount on the Slot Win Report or unclaimed cash report, as applicable. Reconciliation of unsecured funds shall be completed by the end of the gaming day on which the count of the slot machine drop for the machine in which the unsecured funds were located is performed.

(11) In conjunction with the removal of any slot drop container box, a gaming licensee shall manually read, or cause an approved slot monitoring system to record, the slot machine's accounting meters that are used to calculate gross gaming revenue, as described by GLI-11, 5.4.1 *Electronic Accounting and Occurrence Meters*, including the in-meter, drop meter, out-meter, attendant paid jackpots meter, attendant paid cancelled credits meter, bill meters and handle pull meter. In addition, the following meters shall be read and recorded:

- (a) If the slot machine accepts gaming vouchers, the numerical and value cashable gaming voucher meters, and the numerical and value non-cashable gaming voucher meters;
- (b) If the slot machine accepts coupons enrolled in the gaming voucher system, the numerical and value cashable coupon meters and numerical and value non-cashable coupon meters;
- (c) If the slot machine accepts promotional credits, the electronic cashable credit meter and the electronic non-cashable credit meter; and

(d) If the slot machine accepts funds from an account based wagering system, the wagering account transfer-in meter and the wagering account transfer out meter.

(12) The slot monitoring system shall provide a report to the accounting department for a comparison of the meter readings to the count room reports and the calculation of each slot machine's payout percentage. **In the event it is determined after a count that a shortage exists between the total registered on a slot machine's accounting meters that are used to calculate gross gaming revenue, as described by GLI-11, 5.4.1 *Electronic Accounting and Occurrence Meters*, the licensee shall investigate to determine the cause and record the findings. Only members of the accounting department shall have the authority to adjust meter readings subsequent to the count, provided that notification is provided to the IEB and the commission's finance office if the shortage was caused by a technical malfunction. The IEB and/or finance office may take any action necessary to ensure the integrity of the adjustment prior to the month end reconciliation and public reporting of gross gaming revenue.**

(13) Nothing in 205 CMR 138.00 or a gaming licensee's internal controls shall preclude the IEB from requiring a gaming licensee to read a slot machine meter manually as a remedial measure in the event of a malfunction or as it may otherwise deem necessary to ensure the integrity of gaming and the accurate reporting of gross revenue.

138.68: Expiration of Gaming-related Obligations Owed to Patrons: Payment to the Gaming Revenue Fund

(1) The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions governing the expiration of gaming-related obligations, **and unclaimed cash and prizes** that provide, at a minimum, that:

(a) Any money that is owed to a patron by a gaming licensee as a result of a gaming transaction must be claimed within one year of the date of the gaming transaction or the obligation of the gaming licensee to pay the patron will expire. Upon expiration of the obligation, the involved funds must be transferred to the Gaming Revenue Fund in accordance with M.G.L. c. 23K, §§ 53 and 59-;

(b) Any unsecured funds that did not register on a slot machine's coin-in meter, as described in 205 CMR 138.33(7), must be claimed by the owner within one year of the date the funds are located or the obligation of the gaming licensee to pay the patron will expire. Provided, verification procedures designed to prevent fraudulent claims shall be included in the provision. Upon expiration of the obligation, the cash or equivalent cash value of the subject funds shall be transferred to the Gaming Revenue Fund in accordance with M.G.L. c. 23K, §§ 53 and 59; and

~~(b)~~ (c) A gaming licensee shall maintain a record of all **unclaimed cash and prizes and gaming-related obligations** that have expired.

DRAFT

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 140: GROSS GAMING REVENUE TAX REMITTANCE AND REPORTING

140.02: Computation of Gross Gaming Revenue

(3) Slot Machines and Other Electronic Gaming Devices. For purposes of complying with 205 CMR 140.01 relative to the gross gaming revenue payment for slot machine and other electronic gaming device gross gaming revenue, a gaming licensee shall pay the amount calculated by the commission. Disputed amounts shall be reconciled on a monthly basis as described in 205 CMR 140.04(1). Gross gaming revenue equals *drop*, minus jackpot payouts, including vouchers issued by the gaming device, and any hopper fills to the machine, subject to the following:

- (a) For purposes of 205 CMR 140.02(3), *drop* means the total value of coins, slot tokens, and foreign slot tokens in a slot drop bucket or a slot drop box, plus the value of currency, and gaming vouchers in a slot cash storage box, **unsecured funds located inside a slot machine but outside the slot drop box that registered on the coin-in meter**, and electronic credits withdrawn from a patron's account.
- (b) The initial hopper load, if any, shall not be considered a fill.
- (c) A gaming licensee shall not include the cash equivalent value of any merchandise or thing of value as part of the sum paid out as winnings or a jackpot.



MASSACHUSETTS GAMING COMMISSION

PLEASE SUBMIT THIS FORM TO:
MASSACHUSETTS GAMING COMMISSION
ATTENTION: OFFICE OF THE GENERAL COUNSEL
101 FEDERAL STREET, 13TH FLOOR
BOSTON, MA 02110

OR VIA EMAIL TO: catherine.blue@state.ma.us and todd.grossman@state.ma.us

REQUEST FOR NON-DISCLOSURE AGREEMENT (NDA)

Pursuant to 205 CMR 139.02 a gaming licensee may request that the Commission enter into a written NDA under the terms of which the Commission agrees not to release specified material or information publicly, in response to a request for public records or otherwise, and will assert the statutory exemption, M.G.L. c.4, §7(26)(a), and/or any other applicable exemptions, and withhold the applicable materials in response to any request for such record or information. Upon review of the gaming licensee's request, the Commission may execute such an agreement in its discretion. A specific request and rationale must be provided for each piece of information or category of information for which an NDA is sought. Please complete the following.

BACKGROUND INFORMATION

1. NAME OF GAMING LICENSEE
Plainville Gaming and Development, LLC, d.b.a Plainridge Park Casino
2. NAME AND TITLE OF INDIVIDUAL SUBMITTING REQUEST FOR NDA
Roberta Gregoire Compliance Manager
3. PHONE # AND EMAIL ADDRESS OF INDIVIDUAL SUBMITTING REQUEST FOR NDA
508-576-4409 roberta.gregoire@pngaming.com

IDENTIFICATION OF INFORMATION

Please complete the following for each document, report, piece of information, or category thereof for which you seek a NDA:

1. IDENTIFY INFORMATION (MAY BE A SPECIFIC DOCUMENT, REPORT, PIECE OF INFORMATION, OR CATEGORIES THEREOF) (e.g.- the quarterly report describing the gaming licensee's financial position including key performance measures, narrative commentary on operating results, and where applicable, the capital reserve account contributions) Please see Exhibit A-3
2. IDENTIFY SECTION OF 205 CMR 139.00 THAT REQUIRES SUBMISSION OF THE SUBJECT MATERIAL
3. EXPLAIN HOW YOU BELIEVE THE SUBJECT MATERIAL CONTAINS A TRADE SECRET(S) OR WOULD BE DETRIMENTAL TO THE GAMING LICENSEE IF IT WERE MADE PUBLIC:

4. FREQUENCY INFORMATION IS REQUIRED TO BE SUBMITTED:

5. SEEKING NDA ON ONE-TIME OR CONTINUING BASIS? one time continuing

6. IS THERE A WAY TO REDACT THE DOCUMENT OR AGGREGATE THE INFORMATION THAT WOULD ALLOW FOR PUBLIC RELEASE OF REMAINDER OF DOCUMENT?

CERTIFICATION

On behalf of the aforementioned gaming licensee, I hereby certify under the pains and penalties of perjury that all information contained in this application or attached hereto is accurate to the best of my knowledge and understanding. Further, I represent that I have actual authority to submit this application.

Roberta Gregoire
Signature

3/11/16
Date

FOR COMMISSION USE ONLY

REVIEWED BY: _____

DATE REVIEWED: _____

APPROVED

DENIED

APPROVED IN PART

NOTES/EXPLANATION:



PLAINRIDGE PARK
CASINO

301 Washington Street ♦ Plainville, MA 02762

**Request for Non-Disclosure Agreement
Exhibit A-3**

Item	Document or Report Type	Regulation Section	Reason for Non-disclosure	Frequency of Submission	One-time or Continuing	Redactable Y/N
29.	Video recordings, audio recordings, and photographs obtained from the casino's surveillance system, whether by DVD provided to the Commission, agent-conducted downloads from the system, recordings on Commission-owned or personal electronic devices (e.g., cell phones and iPads), or any other means	N/A	<p>The recordings and photographs obtained from the casino's surveillance system should be protected from public release as these items contain information about casino operations, commission and police enforcement action, casino customer behavior (e.g., suspicious, criminal, intoxication, gambling, or other activity), and other sensitive information. Release of these items may be detrimental for Plainridge, its employees and patrons, and Commission and Gaming Enforcement Unit oversight.</p> <p>Other casinos have experienced situations where video was shared via YouTube and with the 20/20 news program, to the detriment of the casinos.</p>	Ad hoc, upon request	Continuing	No
30.	Floor Plans	151.02	Disclosure of the floor plan would provide those that wish to harm the casino with the exact locations of access points to sensitive areas such as the main bank, count room, and service bay for money deliveries, as well as security podiums, monitoring rooms, and surveillance cameras. This information could be used to stage a robbery or perform another type of criminal act.	Prior to opening, then ad hoc, as changes needed	Continuing	No



MASSACHUSETTS GAMING COMMISSION

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BACKGROUND INFORMATION

1. NAME OF GAMING LICENSEE

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2. NAME AND TITLE OF INDIVIDUAL SUBMITTING REQUEST FOR NDA

Roberta Gregoire Compliance Manager

3. PHONE # AND EMAIL ADDRESS OF INDIVIDUAL SUBMITTING REQUEST FOR NDA

508-576-4409 roberta.gregoire@pngaming.com

IDENTIFICATION OF INFORMATION

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1. IDENTIFY INFORMATION (MAY BE A SPECIFIC DOCUMENT, REPORT, PIECE OF INFORMATION, OR CATEGORIES THEREOF) (e.g.- the quarterly report describing the gaming licensee's financial position including key performance measures, narrative commentary on operating results, and where applicable, the capital reserve account contributions) Please see Exhibit A-2

2. IDENTIFY SECTION OF 205 CMR 139.00 THAT REQUIRES SUBMISSION OF THE SUBJECT MATERIAL

3. EXPLAIN HOW YOU BELIEVE THE SUBJECT MATERIAL CONTAINS A TRADE SECRET(S) OR WOULD BE DETRIMENTAL TO THE GAMING LICENSEE IF IT WERE MADE PUBLIC:

4. FREQUENCY INFORMATION IS REQUIRED TO BE SUBMITTED:

5. SEEKING NDA ON ONE-TIME OR CONTINUING BASIS? one time continuing

6. IS THERE A WAY TO REDACT THE DOCUMENT OR AGGREGATE THE INFORMATION THAT WOULD ALLOW FOR PUBLIC RELEASE OF REMAINDER OF DOCUMENT?

CERTIFICATION

On behalf of the aforementioned gaming licensee, I hereby certify under the pains and penalties of perjury that all information contained in this application or attached hereto is accurate to the best of my knowledge and understanding. Further, I represent that I have actual authority to submit this application.

Roberta Gregorie
Signature

3/3/16
Date

FOR COMMISSION USE ONLY

REVIEWED BY: _____

DATE REVIEWED: _____

APPROVED

DENIED

APPROVED IN PART

NOTES/EXPLANATION:



PLAINRIDGE PARK
CASINO

301 Washington Street • Plainville, MA 02762

**Request for Non-Disclosure Agreement
Exhibit A-2**

Item	Document or Report Type	Regulation Section	Reason for Non-disclosure	Frequency of Submission	One-time or Continuing	Redactable Y/N
28.	Monthly Disciplinary Report	N/A	The Disciplinary Report, provided monthly by the Penn National Gaming, Inc. corporate office to the Directors of the IEB and GEU, contains information about disciplinary action imposed by all of the jurisdictions in which Penn National operates. While some of the information contained in the report may be in public records, this is an internal business document prepared solely for internal use and to be shared with auditors and regulators. It is not disclosed to anyone else outside of the company. The company prepares the report to be transparent and open to our regulators and auditors so they can ask the appropriate questions and be informed of all potentially relevant matters. While some information may be able to be culled together from public sources, in its compiled form, the report is not public. We are sensitive to disclosure of the report as it the information contained therein may be used to harm the company. As with the litigation request previously submitted, the sensitivity is analogous in nature to a criminal history dossier for an individual. While some criminal proceedings are public and can be found if one were to search public court dockets, a compilation of an individual's criminal history is usually not publicly available in one accessible record. Thus, the compilation of the data is what makes the document sensitive and confidential.	Monthly	Continuing	No



PLAINRIDGE PARK
CASINO

301 Washington Street • Plainville, MA 02762

29.	Standard Operating Procedures (SOPs)	N/A	Disclosure of the SOPs shared with the IEB upon request would be detrimental to the company as it would provide others with detailed information about the casino's operations. Most departments have established SOPs to provide detailed step-by-step instructions for team members on topics that range from security key controls to main bank imprest bank procedures.	Ad hoc	Continuing	No
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MASSACHUSETTS GAMING COMMISSION

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2. NAME AND TITLE OF INDIVIDUAL SUBMITTING REQUEST FOR NDA
Lisa McKenney Compliance Mgr.
3. PHONE # AND EMAIL ADDRESS OF INDIVIDUAL SUBMITTING REQUEST FOR NDA
508-576-4409 lisa.mckenney@pngaming.com

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2. IDENTIFY SECTION OF 205 CMR 139.00 THAT REQUIRES SUBMISSION OF THE SUBJECT MATERIAL
Please see Exhibit A-4
3. EXPLAIN HOW YOU BELIEVE THE SUBJECT MATERIAL CONTAINS A TRADE SECRET(S) OR WOULD BE DETRIMENTAL TO THE GAMING LICENSEE IF IT WERE MADE PUBLIC: Please see Exhibit A-4

4. FREQUENCY INFORMATION IS REQUIRED TO BE SUBMITTED: Please see Exhibit A-4

5. SEEKING NDA ON ONE-TIME OR CONTINUING BASIS? one time continuing

6. IS THERE A WAY TO REDACT THE DOCUMENT OR AGGREGATE THE INFORMATION THAT WOULD ALLOW FOR PUBLIC RELEASE OF REMAINDER OF DOCUMENT? Not Applicable

CERTIFICATION

On behalf of the aforementioned gaming licensee, I hereby certify under the pains and penalties of perjury that all information contained in this application or attached hereto is accurate to the best of my knowledge and understanding. Further, I represent that I have actual authority to submit this application.

Lisa McKenney
Signature

01/02/2017
Date

FOR COMMISSION USE ONLY

REVIEWED BY: _____

DATE REVIEWED: _____

APPROVED

DENIED

APPROVED IN PART

NOTES/EXPLANATION:



**PLAINRIDGE PARK
CASINO**

301 Washington Street Plainville, MA 02762

**Request for Non-Disclosure Agreement
Exhibit A-4**

Item	Document or Report Type	Regulation Section	Reason for Non-disclosure	Frequency of Submission	One-time or Continuing	Redactable Y/N
32.	The MGC has requested a side by side comparison of metered information from the PPC player tracking system (ACSC) and the State's IGT System. A data pull will be run each day and placed in a SFTP site.	N/A	The information could be used to backwards engineer player information, profit information, machine win loss information, and could represent a strategic disadvantage for Plainridge Park if combined with other data, or used for any purpose other than the State's intention.	Daily	Continuing	No

No Documents

Gaming Economic Development Fund

Student support projects

- Enhanced student experiences

Major capital projects on campuses

- Modest scale capital investments for classroom/lab equipment
- Major capital investments on campuses

Major regional economic development projects

- Aligned with top regional economic development priorities

Gaming Economic Development Fund

Student support projects

- Leveraging Workforce Trust Fund (WTF)
 - “Bridge to College” workforce development training programs with “stackable credits” in high demand industry sectors
 - Free ABE, ESOL, HiSET courses for students interested in enrolling in Community College
 - Incumbent worker retraining in non-profit corporations not eligible for WTF because they self-fund unemployment insurance

Gaming Economic Development Fund

Student support projects

- Summer jobs & internships in STEM and renewable energy companies
- Community College Conservation Corp with community partners
- Scholarships for developmental education not covered by Pell Grants
- Study abroad programs in STEM disciplines
- Dual enrollment programs in STEM and renewable energy
- Year round paid internships in STEM and renewable energy companies and/or life science companies linked with Clean Energy Center and Massachusetts Life Science Center

Gaming Economic Development Fund

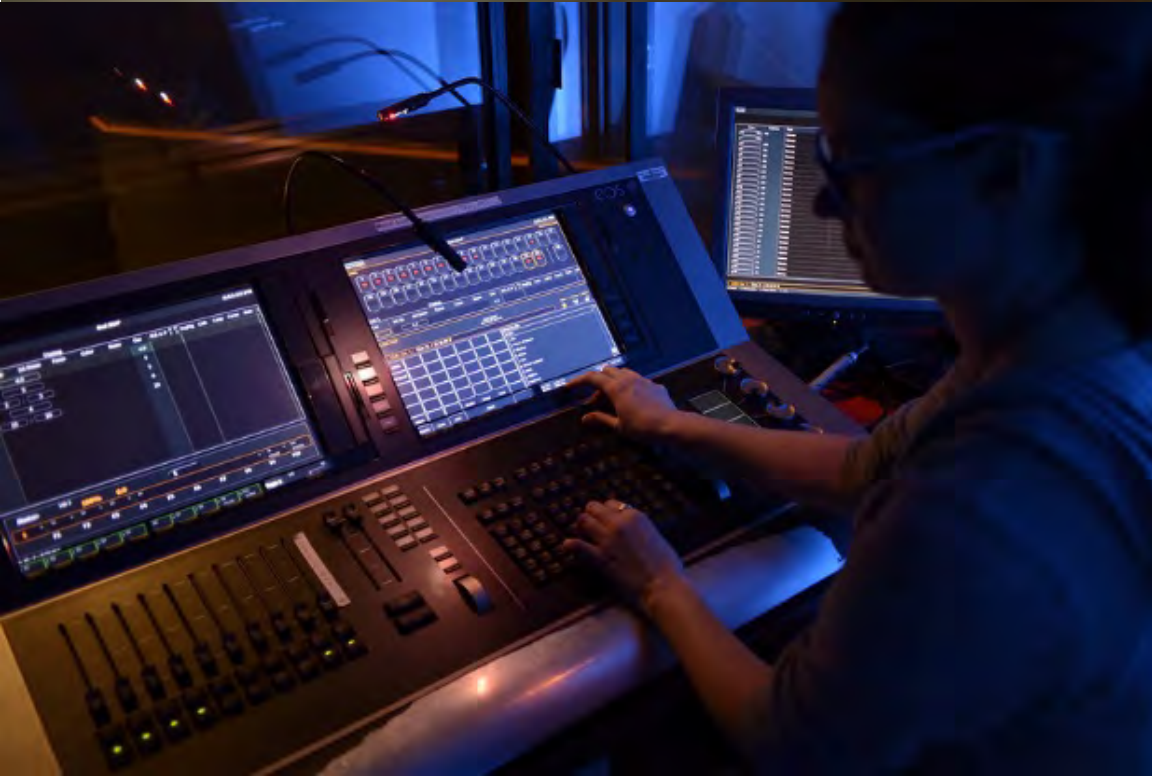
Major capital projects on campuses

- **Capital funding for STEM classrooms & labs**
 - Supports key industry sectors in Commonwealth and region including healthcare, advanced manufacturing and renewable energy
 - Produces graduates with competencies for higher paying occupations
 - ✓ Citizens with higher disposable income are more likely to visit resort casinos

Gaming Economic Development Fund

Major capital projects on campuses

- **\$500,000 to renovate Jackson Art Center at BCC**
 - Directly benefits students in BCC's theater program
 - Higher quality productions & increased access
 - Broad impact on the region; BCC theatre hosts numerous community events
 - Supports entertainment aspect of casino & hospitality industries



Gaming Economic Development Fund

Major capital projects on campuses

- **\$900,000 to relocate the BCC Fitness Center to expand wellness services**
 - ADA compliant locker rooms
 - State-of-art exercise equipment
 - Integrated instructional space for BCC health science programs such as Occupational Therapy Assistant and Physical Therapy Assistant
 - ✓ Among top five growth occupations by DOL Bureau of Labor Statistics



Gaming Economic Development Fund

Major capital projects on campuses

- **\$600,000 to expand and upgrade of Culinary Arts Kitchen to support Hospitality/Food Service Industry**
 - State-of-the-practice culinary art instructional spaces
 - ADA compliant
 - Directly benefits the casino and hospitality industries by providing students in BCC's Culinary Arts programs with greater access and higher quality instruction



Gaming Economic Development Fund

Major capital projects aligned with top regional economic development priorities

- **\$5M-\$10M to create of a “National Offshore Wind Institute for Training” in New Bedford**
 - Partnership with BCC, BOEM leaseholders, Clean Energy Center & Unions
 - Training new and upskilling incumbent workforce for careers in the emerging offshore wind industry
 - 43,000 jobs projected by 2030
 - DOL Bureau of Labor Statistics projects wind turbine technician is fastest growing occupation 2014 through 2024 – 108% growth



September 12, 2017

Commissioner Bruce W. Stebbins
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Dear Commissioner Stebbins:

Please accept this letter in response to your correspondence to key Commonwealth stakeholders dated July 26, 2017 requesting ideas and input regarding proposed investment strategies for the Gaming Economic Development Fund. The Commission's effort to link regional economic development initiatives with the opportunities created by destination resort casinos will greatly benefit the host communities and is sound public policy. It enables host regions to capitalize upon and leverage the economic impacts associated with the casino developments in their community.

The recommendations herein build upon existing regional partnerships and identify potential links with other complimentary financial resources. I respectfully request that you review the following recommendations and consider including them in the "White Paper" being developed by the Gaming Commission.

Bristol Community College proposes the following strategic uses of funds available under the Gaming Economic Development Fund to enhance and expand critical regional economic development investment activities:

1. Section 2DDDD (1) authorizes workforce training. (*Leveraging Workforce Trust Fund*)
 - a. A specific allocation to the Massachusetts Community College system to work in coordination with the Workforce Competitiveness Trust Fund to implement "Bridge to College" workforce development training programs with "stackable credits" in high demand industry sectors, including healthcare, advanced manufacturing and hospitality.
 - b. A specific allocation to the Massachusetts Community College system to provide free courses in Adult Basic Education (ABE), English for Speakers of Other Languages (ESOL), High School Equivalency Test (HiSET) preparation and Developmental Education for students interested in enrolling in Community College.
 - c. A specific allocation to the Massachusetts Community College system to provide incumbent worker retraining in non-profit corporations that are not eligible to participate in the Workforce Trust Fund program because the non-profit corporations are self-funding their unemployment insurance.



2. Section 2DDDD (3) authorizes “summer jobs”. *(Linked with community-based summer jobs programs sponsored by WIBs, Chambers of Commerce and private sector)*
 - a. A specific allocation to the Massachusetts Community College system for paid internships in STEM and renewable energy companies. *(Linked with Massachusetts Clean Energy Center and Massachusetts Life Science Center internship programs)*
 - b. Creation of a Community College Conservation Corp with summer jobs linked to projects co-sponsored by community colleges and community partners.

3. Section 2DDDD (5) authorizes “higher education scholarships”. *(Linked with philanthropic donations and WIB funding for literacy development)*
 - a. A specific allocation to the Massachusetts Community College system to provide scholarships for developmental education courses not covered by Pell Grants, including developmental math, reading, Adult Basic Education (ABE) and English for Speakers of Other Languages (ESOL).
 - b. A specific allocation to the Massachusetts Community College for study abroad programs in STEM disciplines.

4. Section 2DDDD (6) authorizes “regional economic development initiatives” *(Linked with Massachusetts Skills Capital Grant Program and Community College Capital plans)*
 - a. A specific allocation to the Massachusetts Community College for capital funding for STEM classrooms & labs.
 - b. A specific allocation to support creation of a “National Offshore Wind Institute” in New Bedford for “apprenticeship programs” and for training new and incumbent workforce for careers in the emerging offshore wind industry. *(Linked with investments by unions, developers, Massachusetts Clean Energy Center and other OSW stakeholder companies)*

5. Section 2DDDD (8 & 9) authorizes “green job promotion” and “STEM career pipeline initiatives”. *(Linked with Massachusetts Skills Capital Grant Program and Community College Capital plans)*
 - a. A specific allocation to the Massachusetts Community College system for capital funding for equipment in STEM classrooms & labs.
 - b. A specific allocation to the Massachusetts Community College for “dual enrollment” programs in STEM and renewable energy.
 - c. Year round paid internships in STEM and renewable energy companies and/or life science companies linked with Community College academic programs. *(Linked with Mass Clean Energy Center Internships and Mass Life Science Center internship program)*



In addition, we encourage the Gaming Commission to consider recommending the strategic use of funds from the Gaming Economic Development Fund for major, one-time projects at Bristol Community College and other public education institutions. BCC's projects listed below are in priority order. (*Linked with BCC capital plan and with entertainment aspects of resort casino operations*)

1. BCC Theater Renovation to support Arts and Entertainment Industry.
 - a. \$500,000 to renovate Jackson Art Center, a 50-year-old, 700-seat theater that is the largest in Fall River.
 - b. Theater upgrades would include curtains, racks, speakers, sound system, seating, carpets, a resurfaced stage floor and upgrades in ancillary facilities.
 - c. This investment directly benefits students in BCC's theater program and the college community with greater access and higher quality productions.
 - d. It would have broad impact on the region. In addition to BCC productions, numerous local organizations use the BCC theatre to host community events including fully staged ballets, professional and community stage productions, dance recitals, orchestral performances, and public hearings.

2. Wellness (Fitness Center) to support Hospitality/Leisure/Services Industry.
 - a. \$900,000 to relocate the BCC Fitness Center to the Siegel Health Sciences building and expand wellness services offered.
 - b. Upgrades would include new ADA compliant locker rooms, state-of-art exercise equipment, integrated instructional space for BCC health science programs (Occupational Therapy Assistant, Physical Therapy Assistant, etc.) and also would allow non-credit training opportunities (Certified Exercise Instructors, etc.).
 - c. Students, faculty, staff and alumni would directly benefit from better access and higher quality fitness experience. Relocation of the fitness center would allow for item three described below.

3. Expansion and upgrade of Culinary Arts Kitchen to support Hospitality/Food Service Industry.
 - a. Current facility, while upgraded with new appliances, is a 50 year-old retrofitted cafeteria kitchen.
 - b. \$600,000 to expand the current facility into "state-of-the-practice" culinary art instructional spaces, including multiple kitchens and a demonstration kitchen. This investment directly benefits the casino and hospitality industries by providing students in BCC's Culinary Arts programs with greater access and higher quality instruction. Upgrades would be ADA compliant and would allow for non-credit training opportunities.



On behalf of Bristol Community College, thank you for this opportunity to share our ideas about potential uses of resources that will be available from the Gaming Economic Development Fund. Many of the ideas included in the first section of this letter are applicable throughout the entire Massachusetts Community College system. It is also likely that each region and Community College has specific “one-time” capital investments that are important aspects of their respective economic development plans and appropriate for consideration by the Commission.

Going forward, President Laura Douglas designated me to serve as the point of contact between the Gaming Commission and Bristol Community College on this issue. Please feel free to contact me directly via email at paul.vigeant@bristolcc.edu or on my mobile phone at (508) 542-9400.

Sincerely yours,

A handwritten signature in blue ink that reads "Paul L. Vigeant". The signature is written in a cursive style.

Paul L. Vigeant
Vice President
Workforce Development

MASSACHUSETTS CASINO CAREERS TRAINING INSTITUTE (MCCTI)

Gaming Economic Development Fund
White Paper Strategies
October XX, 2017



Gaming Economic Development Fund

As a major new source of funding support for:

- Economic development
- Job growth
- Tourism promotion

The Gaming Economic Development Fund can serve as a essential resource for the long-term vitality of the state's fast-growing casino industry, and related businesses in tourism and hospitality.

Three Sets of Recommended Gaming Economic Development Fund Strategies

1. Workforce Training
2. Higher Education Scholarships and Individual Training Grants
3. Summer Jobs and Experiential Opportunities



The partner community colleges for the Massachusetts Casino Careers Training Institute (MCCTI) Region A – Bunker Hill Community College (lead), North Shore Community College and Roxbury Community College together recommend three broad strategies, each of which are specified in the Gaming Economic Development Fund statute.

The Three Strategies will

- Maintain a skilled workforce into the future for the casino and hospitality industries.
- Ensure access to education, training and employment for un/underemployed workers.
- Provide hands-one learning and intensive on-the-job training for youth and adult participants.



Workforce Training

Contextualized English for Speakers of Other Languages Instruction

- Drawing on successful models at each college site
- Contextualized to the needs of specific positions, i.e. English for Dealers, English for Housekeeping, etc.

Workforce Training

Basic Academic Preparation

- Integrated Education and Training Program (IET) strengthens academic skills and prepares them for their high school diploma
- Delivered concurrently with courses needed for entry into casino and hospitality positions.

Workforce Training

Displaced Worker Assessment and Referral

- Assist individuals who may lose employment due to the expansion of casinos.
- On individual basis or to group of employees of a company that is closing.

Workforce Training

Skills Training for Incumbent Worker Advancement

- College courses and training programs to include supervisory training, human resource oversight laws and regulations, etc.
- Customized to employer training needs.



Higher Education Scholarships and Training Grants

- Essential to provide access for un/underemployed workers served by community colleges.
- Ensure a diverse pool of training participants and employees.
- Defray tuition, fees and other educational expenses for programs targeting the casino and hospitality industries (culinary arts, gaming, information technology, hospitality/tourism, business administration, marketing, etc.) or advance in a casino-related career.

Summer Jobs and Experiential Opportunities



- Paid work experience to prepare workers for high demand positions in the casino and hospitality industries and surrounding community.
- A continuum of experiential learning opportunities to expose and immerse students within the field, growing more intensive as they progress.

Summer Jobs and Experiential Opportunities

1. Summer jobs
 - on-the-job training to expose first-year students to the gaming and/or hospitality fields
2. Paid internships
 - provide students approaching program completion with internship experience linked with a seminar course
3. Apprenticeship model
 - for individuals who commit to a career in casino/hospitality
 - fully integrated workplace and classroom learning experience
 - linked with an Associate degree program in Business Administration, Hotel/Restaurant Management, and IT, among others
 - on-the-job training cycles in all facets of casino operations, from housekeeping and food service, to gaming and human resources

For all options, wages are supported through combination of Gaming Economic Development Funds and employer commitment.

MASSACHUSETTS CASINO CAREERS TRAINING INSTITUTE (MCCTI)
Bunker Hill Community College (lead), North Shore Community College and Roxbury Community College
Region A Greater Boston, Wynn Boston Harbor Resort
MA Gaming Economic Development Fund White Paper Strategies
September 15, 2017

MCCTI Region A partner colleges Bunker Hill Community College (lead), North Shore Community College and Roxbury Community College put forward the following strategies for the Gaming Economic Development Fund. Recommended strategies include a continuum of instruction from Adult Basic Education (ESOL, HiSET) to credit and non-credit certificates and onto associate degree options. In addition, the strategies include scholarships and grants to ensure access for a broad and diverse pool of participants, internship opportunities to provide paid hands-on training in the workplace, and the development of apprenticeships in the casino and hospitality industries.

- **Workforce Training:** To ensure a skilled, credentialed, diverse and prepared workforce for entry and advancement in the Massachusetts gaming and hospitality industries, we recommend:
 - Contextualized English for Speakers of Other Languages Instruction: For adult learners who need to develop their English proficiency, the community colleges can provide ESOL instruction. The program would draw on existing successful models available at each college site, and would be contextualized to the needs of specific positions, i.e. English for Dealers, English for Housekeeping, etc.
 - Basic Academic Preparation: For individuals needing to earn a high school equivalency, an Integrated Education and Training Program (IET) strengthens students' academic skills and prepares them for their high school diploma while simultaneously taking courses needed for entry into casino and hospitality positions.
 - Displaced Worker Assessment and Referral: The colleges can provide sessions designed to assist any individuals who may lose employment due the expansion of casinos, on an individual basis or to the group of employees of a company that is closing.
 - Skills Training for Incumbent Worker Advancement: College courses and training programs could be delivered by the community colleges to include supervisory training, human resource oversight laws and regulations, etc. and could be customized to employer training needs.
- **Higher Education Scholarships and Training Grants:** Scholarships and grants can defray tuition, fees and other educational expenses for individuals who pursue training in a program targeting the casino and hospitality industries (culinary arts, gaming, information technology, hospitality/tourism, business administration, marketing, etc.) or advance in a casino-related career.
- **Summer Jobs and Experiential Opportunities:** Funds can support establishment of paid experiential opportunities for high demand positions in the casino and hospitality industries and surrounding community. For all options, wages would be supported through a combination of Gaming Economic Development Funds and employer commitment. Options could include:
 1. Summer jobs could be utilized as an on-the-job training approach to expose first-year students to the gaming and/or hospitality fields.
 2. Paid internships modeled along the BHCC "Learn and Earn" program would provide students approaching program completion with an internship experience linked with a seminar course.
 3. For individuals who commit to a career in casino/hospitality, we propose the development of an apprenticeship model consisting of a fully integrated workplace and classroom learning experience. Apprenticeships would be linked with an Associate degree program in various options such as Business Administration, Hotel/Restaurant Management, and IT, among others. Apprentices would have on-the-job training cycles in all facets of casino operations, from housekeeping and food service, to gaming and human resources.



Culture works



**Mass
Cultural
Council**

Power of culture

AHA New
Bedford, MA

ECONOMIC IMPACT OF ARTS AND CULTURE IN COMMUNITIES

2



Block Party
Lynn, MA

- Nonprofit arts and cultural organizations provide more than 62,000 jobs.
- Inject \$2.1 billion annually into the state economy.
- Generate another \$2.5 billion of economic activity.
- In 2015 alone, these organizations generated \$104 million dollars in taxes and fees for the Commonwealth

MASS CULTURAL COUNCIL WORKING REGIONALLY

3



Harwich Band Harwich, MA

- The Mass Cultural Council supports 351 cities and towns through its Communities Program.
- Starting with 7 communities, Mass Cultural Council will be harnessing the Power of Culture through the creation of a **cultural compact** that will:
 - Drive growth and opportunity by boosting creative economy initiatives.
 - Build relationships across ethnic, racial, and generational lines.
 - Cultivate cities/towns who want a better place for people to live, work, and thrive.

CULTURE IS INTRINSICALLY VALUABLE

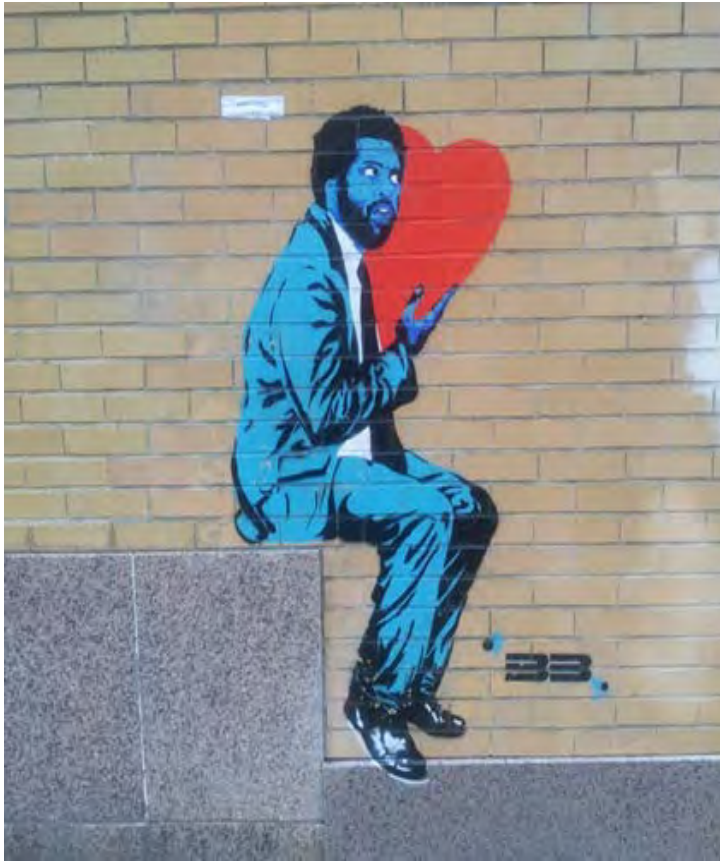


Lowell Folk Festival

Through partnerships with regional, state, and local stakeholders Mass Cultural Council will elevate the importance of culture and artists by:

- building vital communities and,
- increasing economic impact.

SEVEN COMMUNITIES



Mural, New Bedford, MA

- Blandford
- Harwich
- Lynn
- New Bedford
- Pittsfield
- Springfield
- Worcester

Building on the partnerships that the Council has established with each of the communities on this list, our intent is to deepen and broaden a dialogue about growing the reach of our sector through linking their work with economic and community development strategies.

GAMING COMMISSION FUND WILL:

6



Murals Lynn, MA

- Help to **amplify cultural vitality in cities and towns** through integrated community-focused grants, initiatives, and advocacy.
- Increase the impact of community-led efforts to **sustain and promote a rich cultural life** by providing communities the resources, training, and tools needed to increase their capacity and effect change.
- **Support the economic health of communities** through targeted investments in artists and the cultural sector.

GAMING COMMISSION FUND WILL:

7



Colonial Theater, Pittsfield

- Build strategic alliances between the cultural sector, private developers, state agencies, and other Massachusetts community and economic development groups to **stimulate economic growth**.
- **Grow the visibility** of the creative sector in Massachusetts through partnerships that expand markets and/or promote the work of cultural organizations and artists.

QUESTIONS?

MERI JENKINS
Program Manager
Cultural Districts
Adams Arts Program

LISA SIMMONS
Program Manager
Local Cultural Councils
Festivals Program

Ancient Potholes,
Shelburne Falls,
MA

Mass Gaming Commission

Mass Cultural Council Economic Development Strategies

Mass Cultural Council is a state agency that promotes excellence, education, diversity, and inclusion in the arts, humanities, and sciences to foster a rich cultural life for all Massachusetts residents and contribute to the vitality of our communities and economy.

Working through the arts, humanities, and sciences, culture is a dynamic force for enriching communities, growing the economy, increasing accessibility, and fostering individual creativity. Culture is intrinsically valuable and unique in its ability to lift the human spirit.

Nonprofit arts and cultural organizations provide more than 62,000 jobs, pump \$2.1 billion annually into the state economy, and generate another \$2.5 billion of economic activity. In 2015 alone, these organizations generated \$104 million dollars in taxes and fees for the Commonwealth.

The Mass Cultural Council is working on a regional basis to support the 351 cities and towns in the Commonwealth through its Communities Program. Starting with 7 communities across the state (Worcester, Springfield, Pittsfield, Beverly, New Bedford, Dennis & Blandford) Mass Cultural Council will be harnessing the Power of Culture through the creation of a cultural compact that will:

- Drive growth and opportunity through a thriving creative economy
- Build relationships across ethnic, racial, and generational lines
- Cultivate cities towns who want a better place for people to live, work, and thrive.

Building on the partnerships that The Council has established, as a through line in our programs, we will deepen and grow the reach of our sector through economic and community development strategies.

With funding through an allotment from the Gaming Commission fund, Cultural Compact communities will:

- Help to amplify cultural vitality in cities and towns through integrated community-focused grants, initiatives, and advocacy.
- Increase the impact of community-led efforts to sustain and promote a rich cultural life by providing communities the resources, training, and tools needed to increase their capacity and effect change.
- Support the economic health of communities through targeted investments in artists and the cultural sector.
- Build strategic alliances between the cultural sector, private developers, state agencies, and other Massachusetts community and economic development groups to stimulate economic growth
- Grow the visibility of the creative sector in Massachusetts through partnerships that expand markets and/or promote the work of cultural organizations and artists.

Through partnerships with regional, state, and local stakeholders throughout the Commonwealth, Mass Cultural Council will work to elevate the importance of culture and artists by building communities that are viable and by creating an increased economic impact for communities.

Recommendations for the Gaming Economic Development Fund



METRO NORTH REGIONAL EMPLOYMENT BOARD

PRESENTATION TO MASS. GAMING COMMISSION

10/12/2017

JOB TRAINING



- **FUND SCHOLARSHIPS FOR CURRENT JOB TRAINING PROGRAMS**
- **SUPPORT NEW JOB TRAINING PROGRAMS**
- **Possible Funding Mechanisms:**
 - Workforce Competitiveness Trust Fund sector training
 - Fund vouchers through the Career Centers (similar to WIOA)
- ***USE FY2019 REVENUE FROM MGM FOR WYNN TRAINING***

BASIC SKILLS REMEDIATION AND JOB READINESS



- **CRITICAL TO LOCAL RESIDENTS' ABILITY TO ACCESS CAREER OPPORTUNITIES**
- **Possible Funding Mechanisms:**
 - Procure funds specifically for job readiness and ABE/ESOL
 - Increase support for current DESE funded programs
 - Integrate job readiness and ABE/ESOL into workforce development programs

CAREER CENTER IN EVERETT



- **CAREER CENTER IN EVERETT CITY HALL**
- **LOCAL RESIDENTS NEED JOB COUNSELING, CAREER PATHWAY INFORMATION, AND REFERRALS**
- **INTEGRATE WITH METRO NORTH ONE-STOP CAREER CENTERS**

SUPPORT FOR REGIONAL STEM NETWORKS



- **CURRENT FUNDING FROM MA DEPARTMENT OF HIGHER EDUCATION ENDS AFTER FY2018**
- **PRIORITIES:**
 - Work-based learning
 - STEM college and career pathways
 - Computer science & engineering curriculum

REGIONAL PLANNING IMPLEMENTATION



- **WORKFORCE DEVELOPMENT, ECONOMIC DEVELOPMENT, AND EDUCATION WORKING TOGETHER TO SOLVE A CRITICAL SKILLS GAP**
- **CURRENT FUNDING SUPPORTS THE DEVELOPMENT OF REGIONAL “BLUEPRINTS” - MANAGED BY EOLWD**
- **FUNDING NEEDED TO SUPPORT IMPLEMENTATION OF BLUEPRINTS**



Metro North Regional Employment Board

186 Alewife Brook Parkway, Suite 216, Cambridge, MA 02138
Tel: 617-864-1500 | Fax: 617-864-1508 | www.mnreb.org

September 15, 2017

Commissioner Bruce W. Stebbins
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Dear Commissioner Stebbins,

Thank you for inviting the Metro North Regional Employment Board to submit suggestions on the potential use of the Gaming Economic Development Fund. After discussion and consideration, we respectfully submit the following suggestions:

- 1. Scholarships for existing job training/higher education programs in casino occupations:** To prepare Massachusetts residents to be qualified for employment at the casinos, job training and education are imperative. The majority of the casino jobs will be in gaming, culinary, hospitality, cash handling, security, marketing, and business administration. Many job training and higher education programs already exist in these fields. Funds could be used for scholarships for these existing programs for participants who are not able to access the extremely limited current public funding for job training.
- 2. New job training programs:** For some of the casino jobs, either no training program currently exists or the capacity of the current programs will be insufficient. Thus, we recommend that funds be procured to develop new education and training programs for casino and casino related employment.
- 3. Career Center in Everett:** Given the location of Wynn Boston Harbor, we strongly advocate for funding a Career Center in the city of Everett focused on casino and casino related careers. The Career Center could be located at City Hall or onsite at the casino and staffed by Metro North's Career Center operator. In order for local residents to obtain casino jobs, it is imperative that they have targeted career counseling and access to resources and information that can lead to a casino career pathway.
- 4. Basic skills remediation:** Many residents do not possess the requisite basic skills, such as English and math, to access casino employment or job training preparation. The current adult basic education (ABE) and English for Speakers of Other Languages (ESOL) programs have waiting lists. Additional ABE and ESOL classes are essential to prepare residents for employment, education, or training in order to access casino careers. The ABE/ESOL funded by the Economic Development Fund could be contextualized to focus on employment in casino related fields.



- 5. **Job readiness training:** Similar to a lack of basic skills, many residents require job readiness training in order to be prepared to access employment in a casino. This training includes interviewing preparation, resume writing, effective communication, problem solving, teamwork. Similarly, the job readiness training funded by the Economic Development Fund could be contextualized to focus on employment in casino related fields.

- 6. **Utilize FY2019 revenue for training for Wynn training:** MGM is scheduled to open in fall 2018 while Wynn Boston Harbor is scheduled to open in June 2019. Giving local residents the ability to be prepared for the first wave of the casino hiring is imperative as it will be by far the time when the greatest number of workers will be hired. Since the Economic Development Fund is a statewide fund, utilizing FY2019 revenue to prepare residents for the opening at Wynn is critical to local residents access to Wynn careers. Funds could be used for short term job training in fields such as culinary, hospitality, gaming, and cash handling.

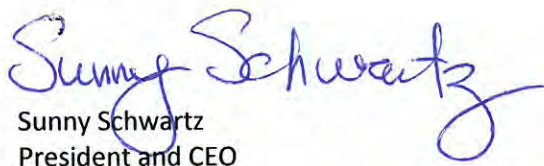
- 7. **STEM Networks:** The Massachusetts Executive Office of Education currently funds four STEM Networks statewide. These networks are charged with advancing the statewide STEM Advisory Council's three STEM priorities:
 - a. Expand work-based learning programs
 - b. Develop and expand STEM early college career pathways
 - c. Broaden and deepen computer science & engineering initiatives

Current funding for the Networks is due to end after the current 2018 fiscal year. The Networks are critical investments that align efforts across various stakeholders, including education, workforce development, and business and industry. STEM, and the related projected skills gap in STEM-focused fields, needs to be a continued priority for the Commonwealth. Continued investment in these Networks beyond FY18 will help the Commonwealth be able to address this priority.

- 8. **Regional plan implementation:** Led by the Executive Office of Labor and Workforce Development, and leveraging the infrastructure of the Governor's Workforce Skills Cabinet, the statewide regional planning process combines the efforts of workforce development, economic development, and education in order to develop workforce and labor market "blueprints" for seven regions across the Commonwealth. The current effort, set to conclude in January 2018, is focused on identifying priority industries and occupations where significant skills gaps exist. However, no current funding exists to implement strategies to address the priorities outlined in the blueprints. Funding from the Economic Development Fund could be used to support the implementation of the regional plans.

The REB is happy to help further in developing or reviewing the White Paper that the Gaming Commission will present to the legislature or help in other way. Thank you for your leadership.

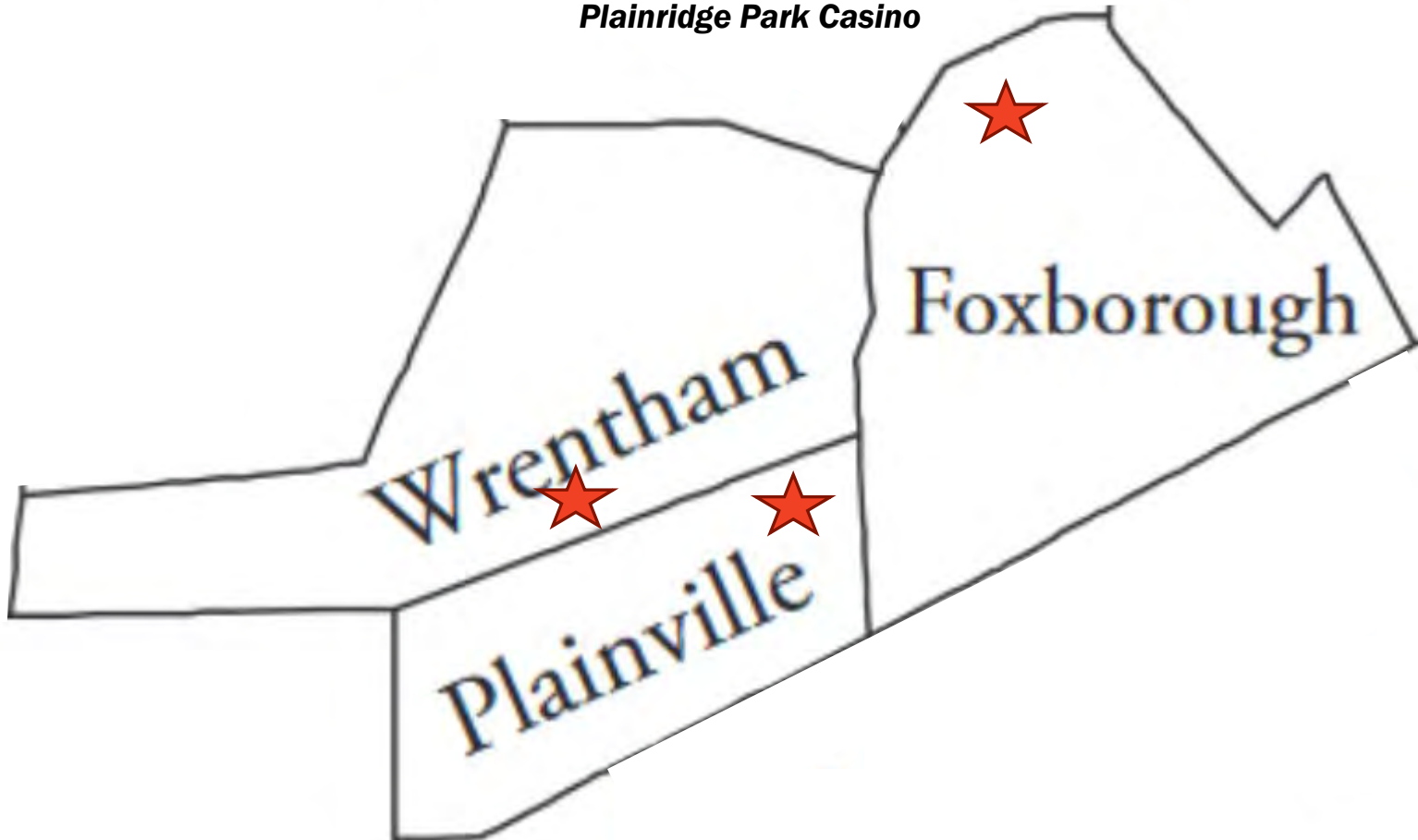
Sincerely,



Sunny Schwartz
President and CEO

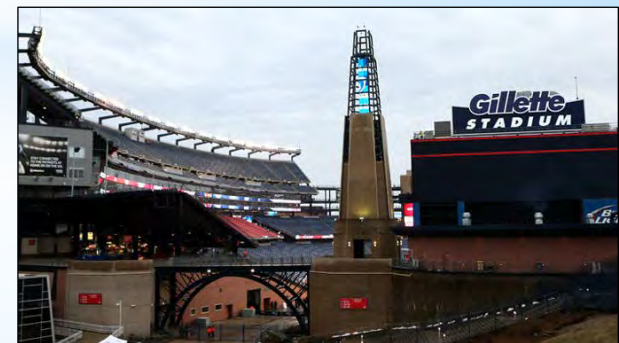
Gaming Economic Development Fund Strategies for the Towns of Foxborough, Plainville and Wrentham, Massachusetts

*In Cooperation with:
Patriot Place/Gillette Stadium
Wrentham Village Premium Outlets
Plainridge Park Casino*

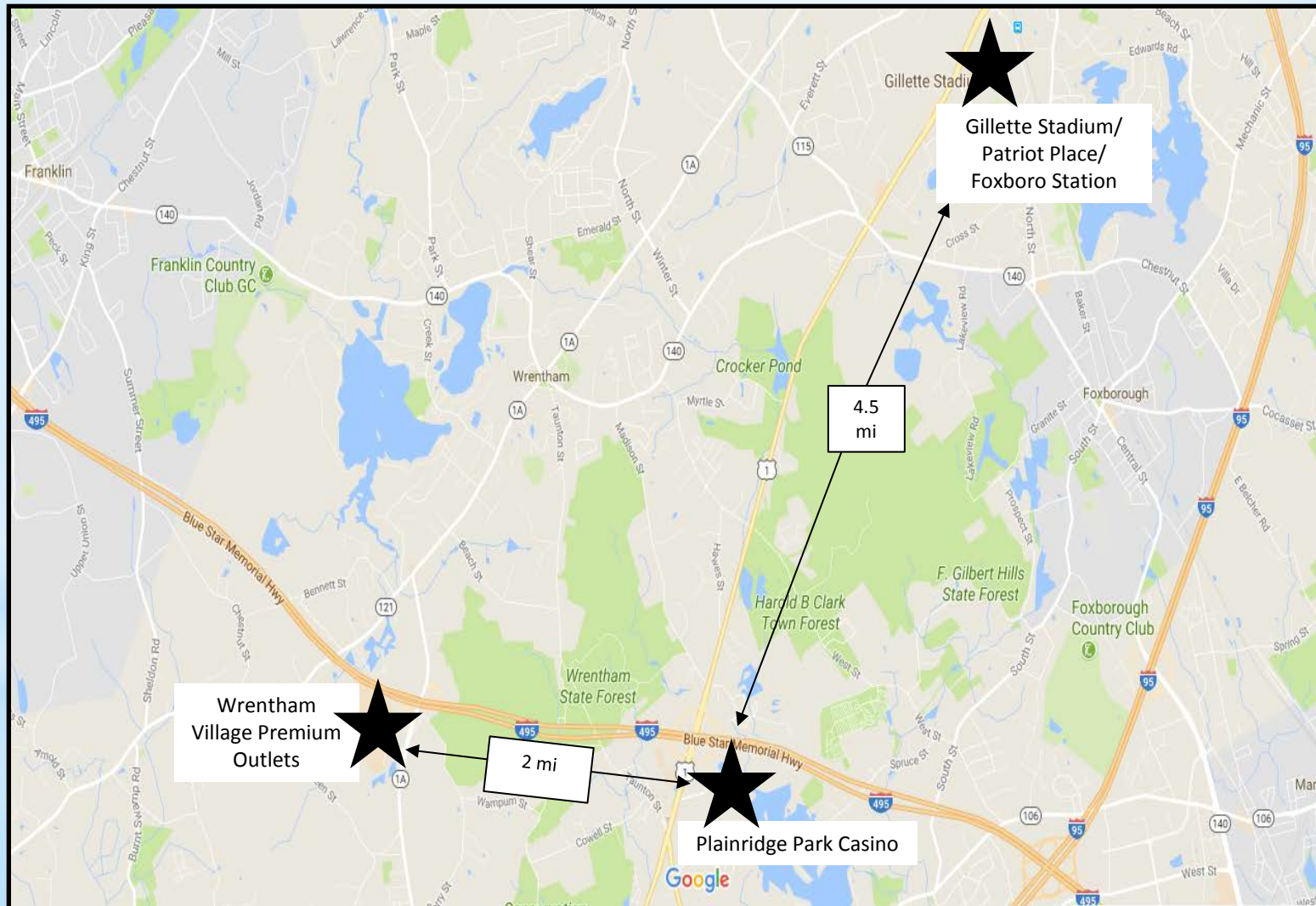




- The Towns of Foxborough, Plainville and Wrentham have teamed up to develop strategies for the future Gaming Economic Development Fund.
- We have partnered with the three major destinations located within our communities.
 - Patriot Place/Gillette Stadium
 - Plainridge Park Casino
 - Wrentham Village Premium Outlets



These three major destinations are located within seven miles of each other. Combined, they draw an estimated 20,000,000 visitors per year to our region.



Regional Destination: Patriot Place

- Patriot Place is a shopping, dining and entertainment destination located adjacent to Gillette Stadium in Foxborough. This mixed-used development attached to a stadium venue provides year-round opportunities to attract guests with dining, entertainment, hospitality, specialty retail, two hotels and world class health care.
 - Patriot Place has 15 restaurant options and entertainment venues including:
 - Davio’s, Bar Louie, CBS Scene and Toby Keith’s
 - Splitsville Luxury Lanes, The Hall at Patriot Place, 14 Screen Cinema de Lux
 - Two Upscale Hotels:
 - Four Star 158 room Renaissance Hotel
 - 136 room Hilton Garden Inn
 - Destination Retail including:
 - Southern New England’s only Bass Pro Shops
 - World-class health care facilities operated by:
 - Brigham and Women’s Hospital
 - Massachusetts’s General Hospital



Other Interesting Destinations to Augment our Region ...



An Unlikely Story Bookstore & Café in Plainville – owned and operated by Jeff Kinney, author of *The Diary of a Wimpy Kid* book and movie series. Located less than 3 miles from Plainridge Park Casino.



The Xfinity Center (formerly “Great Woods”) – an outdoor amphitheatre located in Mansfield, Massachusetts. The venue accommodates 20,000 guests. Located 7 miles from Plainridge Park Casino.



Tournament Players Club (TPC) Boston – a golf course located in Norton that hosts an annual PGA Tour event, The Dell Technologies Championship (formerly the Deutsche Bank Championship). Located less than 8 miles from Plainridge Park Casino.

Our Downtowns ...



Downtown Foxborough seems less like a Boston suburb and more like a quaint Vermont town. The Common is a small oasis with park benches, old-fashioned lamps, a gazebo and war memorials. Small shops, a revitalized theatre, a new Town Hall and restaurants surround this picturesque Town Common.



Downtown Plainville is anchored by An Unlikely Story bookstore and café, and will soon include a new municipal complex. In the center of the downtown is the beautiful Teleford Park which hosts many community wide events and recreation activities



Downtown Wrentham reflects the quintessential, New England small town atmosphere. It features a white steepled church, a beautiful Town Common, an historic bed and breakfast and an appealing row of small, specialty shops.

We Want to Convert Day-Trips to Multi-Day Trips

- The Wrentham Village Premium Outlets is extremely popular with international visitors, especially from Europe and Asia. Most of these visitors are based out of Boston and take a day trip to the region. Most international visitors do not patronize our hotels, downtowns, restaurants or other regional amenities.
- According to the online Boston Visitors Guide, out of town visitors without cars have the following options to travel to the Wrentham Village Premium Outlets:
 - “Take the Commuter Rail from Boston to Franklin, the closest station to the Wrentham Village Premium Outlets, and take a cab from there.”
 - “Or, take one of the tour bus trips leaving from Boston and going directly to the Wrentham Village Premium Outlets.”
- Our goal is to convert the one-day travelers into multi-day travelers who stay in our region and further contribute to the local economy.

We Want Visitors to Stay in Our Region

- Our region boasts many hotels (1,200+ rooms with more under development). Brand names include: Marriott, Hilton, Hampton Inn, Holiday Inn and Renaissance brands.
- Restaurants in our region:
 - Patriot Place = 20
 - Plainridge Park Casino = 2 plus food court
 - Wrentham Village Premium Outlets = 15
 - Foxborough = 30 (not including Patriot Place)
 - Wrentham = 13 (not including Wrentham Village Premium Outlets)
 - Plainville = 20 (not including Plainridge Park Casino)
 - And many more in neighboring communities.
- Commuter rail service is coming to the existing Foxboro Station (currently used for special events only) in the Spring of 2019.
- The Kraft Group is in the running to host World Cup 2026, which would draw a tremendous international following to the region.

Strategies for Economic Development - Tourism

- Through the use of Gaming Economic Development funds, improve the Tourism Management Infrastructure for our region.
 - Establish a dedicated sales/public relations and marketing staff to proactively market our region to attract conferences, group tours (local and from outside the region), senior citizen and other bus tours. Focus not only on “drive market” but also to groups and visitors traveling from greater distances (150+ miles).
 - This staff would work closely with the Greater Boston Convention & Visitors Bureau and the MetroWest Visitors Bureau to ensure maximum coverage for attracting future visitors. The Greater Boston Convention & Visitors Bureau is endorsing this initiative and has indicated a willingness to work with us.
 - Strategy includes measurement tools to ensure effective evaluation of the success of the initiative. Whether it’s through tracking sales tax, bookings, number of calls or other methods, the long- and short-term return on investment should be able to be quantified and evaluated.



Strategies for Economic Development - Transportation

- Through the use of Gaming Economic Development funds, establish a regular fixed shuttle route between the three major destinations and the Foxboro Commuter Rail Station at Gillette Stadium.
 - Include our downtowns and other destinations along shuttle route.
 - Consider use of Gaming Economic Development funds to expand commuter rail service during weekdays and to include weekends to support not only tourism but workforce development.



Strategies for Economic Development – Workforce Development

- Our region is a thriving workforce development area. Our businesses and industries also have an increasingly aging labor force, which will generate the need to attract a replacement workforce; a workforce which tends to be comprised of millennials with a transit-oriented mindset.
 - During the FMCB's review of the pilot service to Foxboro Station, reverse commute was raised as a possibility for increasing job opportunities for residents living along the Fairmount Line. Unfortunately commuter rail schedules are not typically conducive to reverse commuting, as the focus tends to be on getting riders into Boston, not out.
 - We propose to work with MassDOT and MBTA to evaluate and plan opportunities to increase commuter rail service to Foxboro Station to allow convenient and predictable reverse commute opportunities.
 - Use Gaming Economic Development Funds to provide last mile connections for these transit-dependent workers, and to create a subsidy to assist lower income workers with the cost of commuter rail transportation.

Strategies for Economic Development – Workforce Development

- Use Gaming Economic Development Funds to establish a grant program to allow employers within our service area to train prospective and current employees as needed. This would be particularly advantageous for entry level workers who hope to advance in their careers but are unable to do so without additional training or education.
- Build on existing relationships with Dean College, Bristol Community College and other local colleges to develop workforce training initiatives to support lower income workers in their training and education.



Summary of Strategies for Gaming Economic Development Fund

➤ Tourism

- Create a sense of place, a regional destination that is promoted in a professional, proactive and cohesive fashion.
- Partner with the Greater Boston Convention & Visitors Bureau and MetroWest Visitors Bureau.
- Install dedicated sales/public relations and marketing staff to proactively market our region to attract conferences, group tours (local and from outside the region), senior citizen and other bus tours.
- Establish an advocate for group trip planners to ensure that visitors are fully aware of all our region has to offer.
- Convert one-day travelers into multi-day travelers who stay in our region and further contribute to our local economies.
- Establish regular shuttle route between major destinations, our downtowns and Foxboro Station commuter rail station.
- Work with MassDOT and MBTA to evaluate and plan opportunities to increase weekday and weekend commuter rail service to Foxboro Station.

Summary Continued ...

Workforce Development

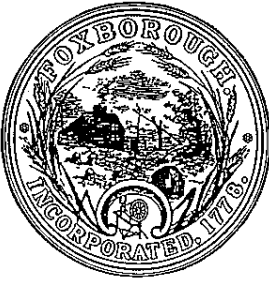
- Work with MassDOT and MBTA to evaluate and plan opportunities to increase reverse commute opportunities for transit-dependent workers.
- Use Gaming Economic Development Funds to provide last mile connections for transit-dependent workers
- Use Gaming Economic Development Funds to create a subsidy to assist lower income workers with the cost of commuter rail transportation.
- Use Gaming Economic Development Funds to establish a grant program to allow employers within our service area to train prospective and current employees as needed.
- Work with Dean College, Bristol Community College and other local higher education institutions to develop additional workforce training initiatives.

*** Thank you for your
consideration.**

*** Questions?**

*** Comments?**

*** Discussion**



TOWN OF FOXBOROUGH

Office of the Planning Director

40 South Street

Foxborough, Massachusetts 02035

Phone: 508-543-1250

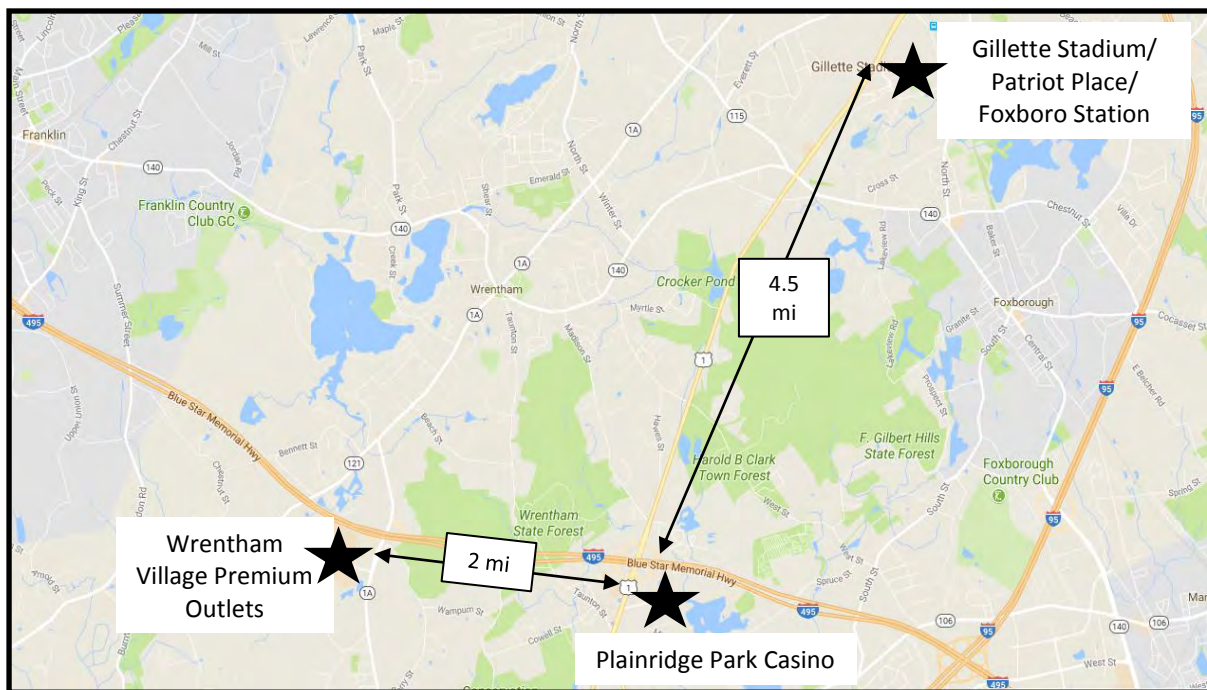
Fax: 508-543-6278

September 15, 2017

Mr. Bruce W. Stebbins, Commissioner
Massachusetts Gaming Commission
1010 Federal Street, 12th Floor
Boston, MA

Dear Mr. Stebbins and Members of the Gaming Commission:

The Towns of Plainville, Foxborough and Wrentham are unique in that the three neighboring communities each have a major regional destination located within their borders. Plainville has Plainridge Park Casino, Wrentham has the Wrentham Village Premium Outlets and Foxborough has Patriot Place/Gillette Stadium, all of which are located within seven miles of each other (please see map below). These three major destinations combined bring in an estimated 20,000,000+ visitors per year to our region.



Each of these destinations is successful in their own right but our proposal seeks to strengthen our regional economy by leveraging the power of all three destinations by establishing a coordinated approach to economic development, workforce development, marketing and tourism. The Town of Foxborough has taken the lead on this initiative with the cooperation of the Towns of Plainville and Wrentham, along with the support of Plainridge Park Casino, Wrentham Village Premium Outlets and Patriot Place/Gillette Stadium.

While our primary focus of this proposal is focused on the three towns that host year-round destinations, we hope to augment the region's already strong appeal by working to include other nearby significant venues, including the Xfinity Center in Mansfield (warm weather entertainment/concert venue) and the Tournament Players Club (TPC) Boston, a golf course located in Norton that hosts an annual PGA Tour event, The Dell Technologies Championship (formerly the Deutsche Bank Championship).

It is our understanding that the Expanded Gaming Act of 2011 included a provision to create a Gaming Economic Development Fund. Amounts credited to the fund shall be expended, subject to appropriation, to support economic development and job growth including, but not limited to: (1) workforce training, including transfers to the Workforce Competitiveness Trust Fund established in section 2WWW of chapter 29; (2) tourism promotion, including regional tourism promotion agencies and cultural and recreational attraction promotion; (3) summer jobs; (4) the Massachusetts marketing partnership established in section 13A of chapter 23A; (5) higher education scholarships; (6) regional economic development initiatives; (7) support for small businesses, including small business lending; (8) green jobs promotion; (9) science, technology, engineering and mathematics career pipeline initiatives; and (10) agricultural development programs, including youth agricultural education

Pursuant to your July 26, 2017 letter, our group respectfully requests that you consider the following strategies to leverage the Plainridge Park Casino to benefit our region:

Tourism Promotion and Regional Economic Development – Utilizing funds from the Gaming Economic Development Fund, the region will engage the services of a sales/public relations/marketing individual or team to oversee and coordinate the promotion of our region. This individual or team would be responsible for working with key stakeholders to define, create and advertise a cohesive and complementary sense of place.

The focus of this promotion and outreach effort would not only be for those within the “drive market”, but also to groups and visitors traveling from greater distances (150+ miles). The Wrentham Village Premium Outlets already attract a large number of international visitors. In fact, announcements over the Outlets’ loudspeakers are broadcast in several languages, reflecting the diversity of visitors. Capitalizing on the success of the Wrentham Village Premium Outlets with the international market could result in these travelers opting to include Plainridge Park and Patriot Place/Gillette Stadium in their travel itinerary. Today most of the international travelers to the Outlets do not stay locally. Many travel from either Boston or Providence for a

day visit. Our goal is to convert the one-day travelers into multi-day travelers who stay in our region and further contribute to the local economy. Conceivably, these visitors would patronize our major destinations as well as our downtowns, restaurants and other retail establishments. Establishing an advocate for group trip planners will ensure that visitors are fully aware of all our region has to offer.

With our world class athletic venue in Gillette Stadium, our region now has the amenities necessary to attract world class events to draw visitors and spending to our region. Gillette Stadium is currently under consideration for World Cup 2026. When World Cup 1994 took place, the region's tourism infrastructure was limited to the old Foxboro Stadium. Today our region boasts not only a world class athletic venue but also a casino, many restaurants, world-renowned retail and more than 1,200+ hotel rooms (with many more in planning and construction stages). The limiting factor now is tourism management infrastructure. Funding from the Commission will allow our region to partner with the Greater Boston Convention & Visitors Bureau to begin creating a sense of place for our region with those who will be deciding on what cities/regions are awarded World Cup matches.

The Kraft Group has a proven track record to stage and host national and international events. Further, we firmly believe that the New England Patriots, Gillette Stadium and Patriot Place already have an established international following based on the success of their organization. By establishing a consistent marketing tool that captures all of the aforementioned destinations we believe that a whole new market could be opened to this region on an international level.

Our goal is to establish a dedicated sales/public relations and marketing staff that would be responsible for proactively marketing our region to attract conferences, group tours (local and from outside the region), senior citizen and other bus tours. This staff would work closely with the Greater Boston Convention & Visitors Bureau and the Metro-West Visitors Bureau to ensure maximum coverage for attracting future visitors. The Greater Boston Convention & Visitors Bureau is endorsing this initiative and has indicated a willingness to work with us. In the future, if successful, consideration could then be given to forming a new Metro-South Visitors Bureau.

When establishing a sales/public relations/marketing team, there should be measurement tools put in place to ensure effective evaluation of the success of the initiative. Whether it's through tracking sales tax, bookings, number of calls or other methods, the long- and short-term return on investment should be able to be quantified and evaluated.

On August 14, 2017, the Fiscal Management Control Board (FMCB) for the MBTA approved weekday commuter rail service to the existing Foxboro Station at Gillette Stadium on a trial basis. This new service is scheduled to commence in the Spring of 2019. Availability of convenient and predictable transit is important because so many international travelers do not want to drive in the U.S. Public transportation options are critical to the success of drawing these visitors to our region. We propose to use Gaming Economic Development Funds to

establish a shuttle route between the three major destinations in our region (other stops could be considered, such as downtowns) along with a stop at Foxboro Station at Gillette Stadium.

Based on the level of success that this marketing effort could achieve, supplemental funds may also be needed to help expand commuter rail service to include weekends. This expanded service would be particularly supportive to tourist travel. Our communities are prepared to assist in advocating for this additional service, if needed, with the Massachusetts Department of Transportation and the MBTA. Now is a particularly good time to start planning around the new commuter rail service.

Workforce Development and Training – Our region is a thriving workforce development area with an increasingly aging labor force. These factors will generate the need for a replacement workforce comprised of millennials with a transit-oriented mindset. It would be impossible to ignore the impact the commuter rail and last-mile transit could have on regional workforce development opportunities.

Commuter rail service to Foxboro Station will be provided by extending service along the existing Fairmount Line, which runs from South Station through environmental justice neighborhoods of Dorchester, Mattapan, and Hyde Park. The Fairmount Line currently serves a higher share of minority riders than any other commuter rail line in the MBTA system. During the FMCB's review of the pilot service to Foxboro Station, the issue of reverse commute was raised as a possibility for increasing job opportunities for the residents living along the Fairmount Line. Unfortunately commuter rail schedules are not typically conducive to reverse commuting, as the focus tends to be on getting riders into Boston, not out.

We propose to work with the Massachusetts Department of Transportation and the MBTA to evaluate and plan opportunities to increase commuter rail service to Foxboro Station to allow convenient and predictable reverse commute opportunities. To this end, we also propose to use Gaming Economic Development Funds to provide last mile connections for these transit-dependent workers. Finally, we propose to use Gaming Economic Development Funds, as needed, to create a program to assist lower income workers with the cost of commuter rail transportation.

We also propose to use Gaming Economic Development Funds to establish a grant program to allow employers within our service area to train prospective and current employees as needed. This would be particularly advantageous for entry level workers who hope to advance in their careers but are unable to do so without additional training or education.

Patriot Place already has a well-established relationship with Dean College in Franklin. We also have Wheaton College in nearby Norton, MA and Stonehill College in Easton, MA. We propose to work with these higher education institutions, as well as nearby community colleges, to develop workforce training initiatives.

In summary, our goal is to create a regional destination that is promoted in a professional, proactive and cohesive fashion. We want to attract additional day trippers, vacationers and conference attendees to work, play and eat in this region. Our major points of destination and venues are already successful in their own right, but we believe that coordinating our efforts to create a sense of place will draw more visitors and infuse more money into our local, state and regional economy. A cross promotion of the attractive elements of Plainridge Park, Patriot Place and the Wrentham Village Premium Outlets will only increase awareness and generate visitor interest in our region. Expansion of our economy in this region will create job growth, economic opportunity and an expanded quality of life for residents and businesses.

On behalf of the Towns of Foxborough, Plainville and Wrentham, in cooperation with Plainridge Park Casino, the Wrentham Village Premium Outlets, Patriot Place and Gillette Stadium we thank the Massachusetts Gaming Commission for seeking our input at this time. While our ideas are only conceptual at this time, we welcome the opportunity to further refine and expand our thoughts with the Commission. We are very excited about the opportunities the Gaming Economic Development Fund could provide. It would be a pleasure to work with you to help bring these ideas to life. Please do not hesitate to contact us if you have any questions or require additional information.

Very truly yours,

Paige E. Duncan, AICP
Planning Director

Copies to:

Jennifer Thompson, Plainville Town Administrator
Jerry McGovern, Chairman Wrentham Board of Selectmen
John Charbonneau, Director of Planning and Development, Town of Wrentham
Lance George and Michele Collins, Plainridge Park Casino
Candice Beaulieu, Director of Marketing & Business Development, Wrentham Village Premium Outlets
Dan Krantz and Ted Fire, The Kraft Group
Brian Earley, General Manager, Patriot Place/NPP Development LLC
Patrick Moscaritolo, Greater Boston Convention & Visitors Bureau
Kara Griffin, Executive Director, Tri-Town Chamber of Commerce
Jack Lank, The United Regional Chamber of Commerce
Marc Draisen, Executive Director, Metropolitan Area Planning Council
Karen Dumaine, Greater Boston Area - TMA Director, Neponset Valley at TransAction Associates -
TransAction Associates

Massachusetts Gaming Commission Presentation

October 12, 2017

David O'Donnell
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Greater Boston Convention & Visitors
Bureau

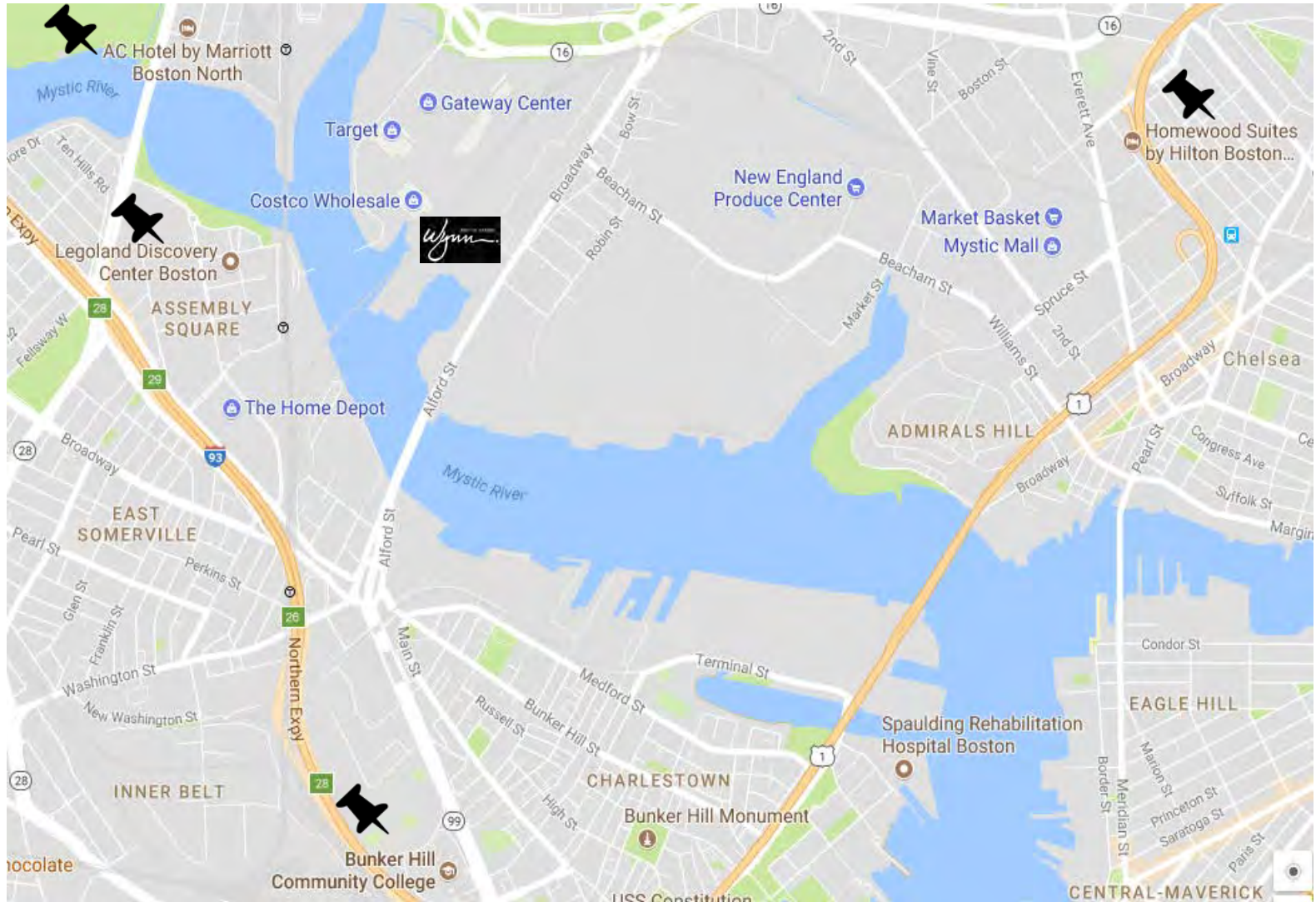


Gaming Economic Development Fund Strategy

- As part of the GBCVB Expanded China Marketing Initiative, the Bureau will collaborate with restaurant, retail and hotel member companies to create a set of marketing, sales, services, and workforce training modules to meet the needs of Chinese visitors.
- In the US, spend from Chinese visitors has surpassed Canada, Mexico and the UK, and the hospitality industry is looking to CVBs to spearhead marketing initiatives and training programs to meet the needs of Chinese visitors.
- Initial partners in the GBCVB model would include Colwen Hotels, Assembly Row, Wynn Boston Harbor, Cambridge Office for Tourism, and MA Office of Travel & Tourism.
- The model would include outreach to local hospitality programs at Boston University, Simmons, Endicott, Lasell, Salem State, Bay State, Bunker Hill, Middlesex, and Fisher to begin developing the training module at the college and university level.
- These modules could then be replicated and utilized across the Commonwealth and New England, and adapted to serve other international audiences.



Area Map Around Wynn Boston Harbor



Inbound Travel from China is Booming

- According to US Department of Commerce data, Chinese visits to the US are forecasted to increase at an annual average rate of 14.4% over the next five years (2017-2021) and will increase to more than 5.7 million by 2021.
- What does this all mean for our visitor industry? In 2016 Boston and the region attracted 242,000 Chinese visitors making it our largest overseas visitor source market, supplanting the UK. Chinese visitors spent an average of 19.1 nights in Boston and the metro region with a total spend of \$1.2 billion.
- **OVER THE NEXT FIVE YEARS THE GBCVB HAS A GOAL TO INCREASE OUR MARKET SHARE FROM 8% TO 8.7% WITH A TARGET OF ATTRACTING MORE THAN 500,000 VISITORS FROM CHINA TO BOSTON BY 2021.**



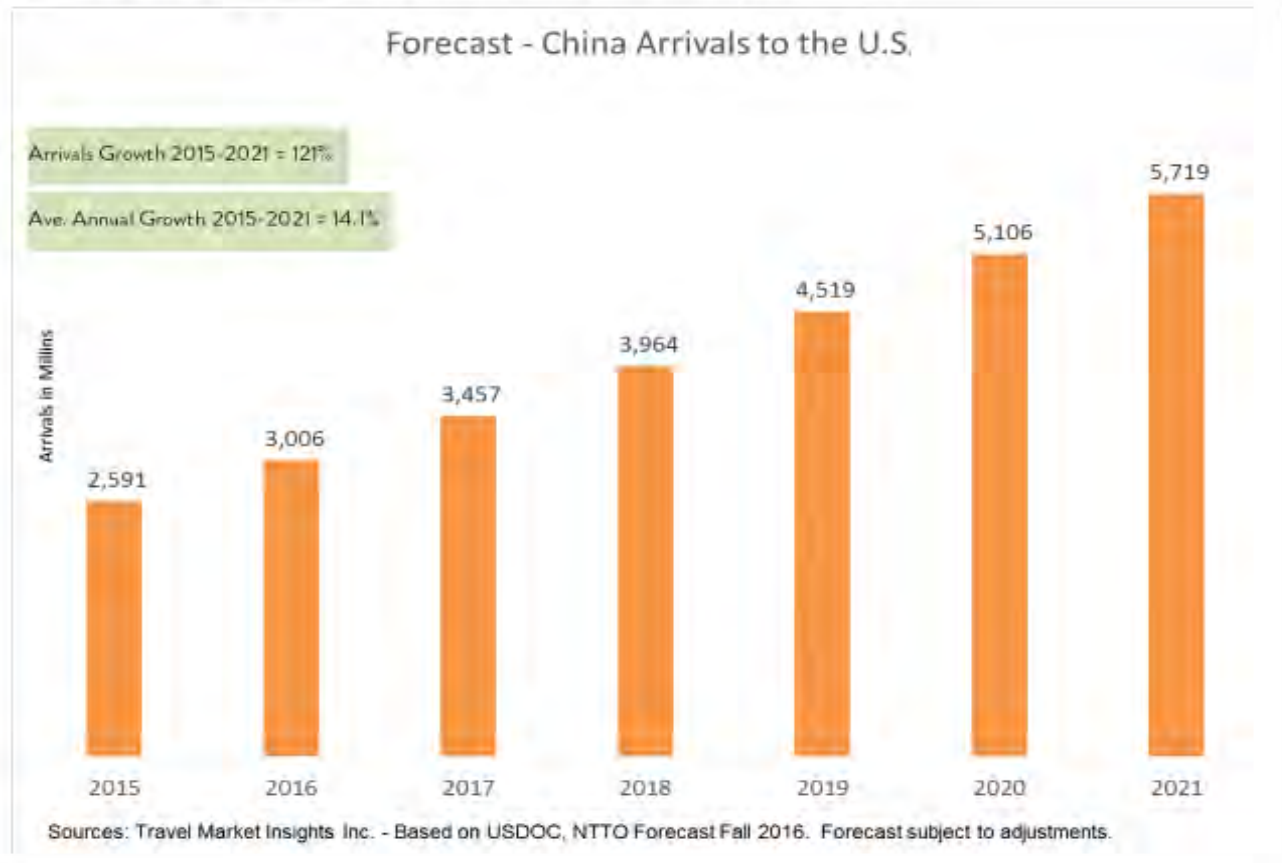
Highlights for 2016 Overseas Travelers to Boston: China surpasses UK

	Total Overseas	China	UK	Germany
Estimated Travelers	1,526,000	242,000	196,000	120,000
Total Spend	\$3,571,213,101	\$1,201,591,206	\$274,397,905	\$132,057,446

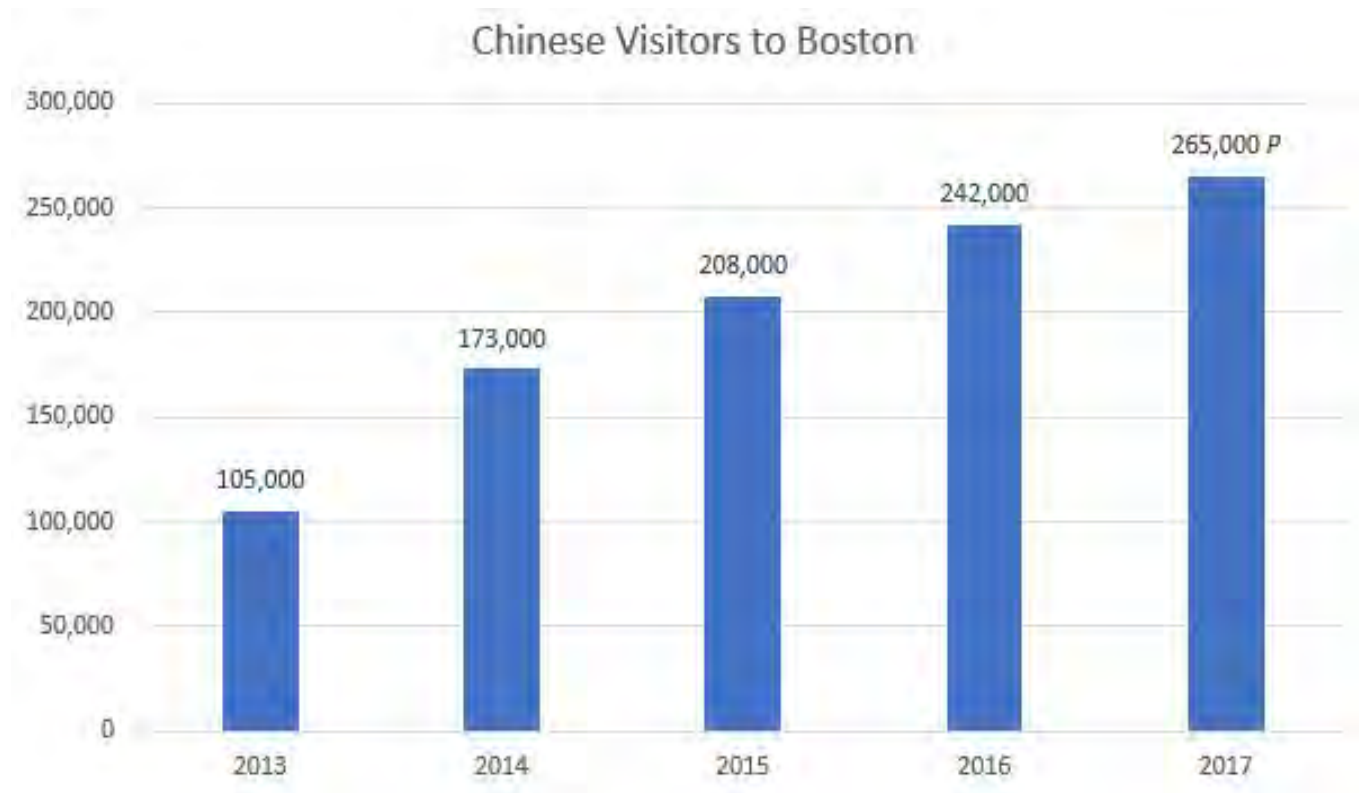
- Overseas travelers represent 8% of total visitors to Boston & Cambridge but account for over 15% of all visitor spending.
- Chinese visitors accounted for 34% of total overseas expenditures and on average spent nearly \$5,000 per visit.

Forecast: China Arrivals to US 2015-2021

- Arrivals from China will grow an estimated 14% annually
- Adding 3.13 million more arrivals between 2015 and 2021



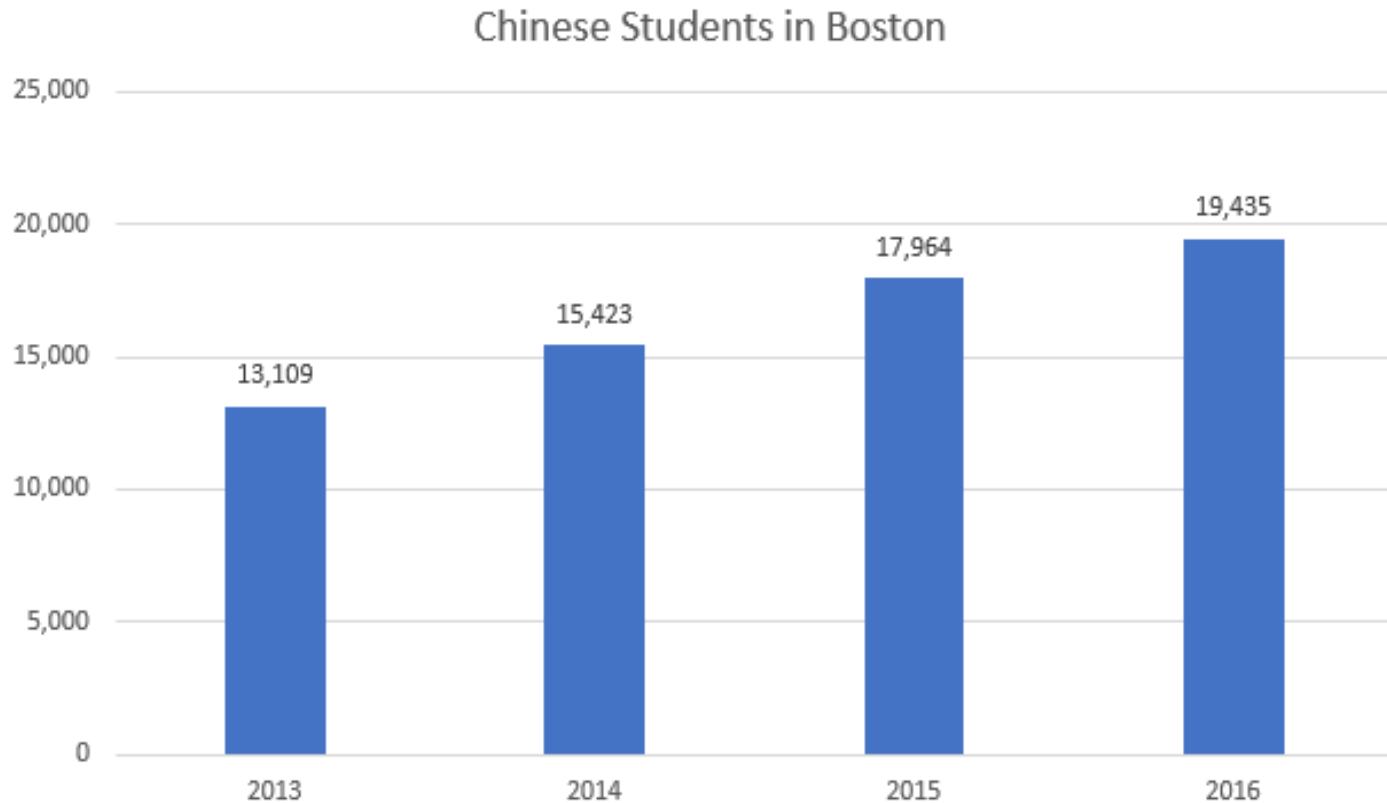
Chinese Visitors to Boston: 2013-2017



Chinese visitors to Boston grew by 130% between 2013 – 2016

Source: *Travel Market Insights based on US Dept of Commerce data*

Chinese Students attending Boston & MA Colleges & Universities: 2013-2016



Chinese students in Boston & MA grew by 48% between 2013 – 2016

Source: *Open Doors Institute*

International Students in Boston and Massachusetts colleges 2016

College	Number
Northeastern	11,702
Boston University	8,455
Harvard University	5,679
MIT	4,575



2016 Chinese students at Boston & MA Colleges & Universities

Year	Total International Students - Boston & MA	Chinese students - Boston & MA	% of Chinese students - Boston & MA	Total Chinese Student in US	% of Chinese students in US
2011	38,698	8,281	21.4%		
2016	59,436	19,435	32.7%	328,547	31.5%

- From 2011 to 2016, 135% growth in Chinese students at Boston & MA Colleges

Overall Student Spending - Boston & MA

Year	By International Students Boston & MA	By Chinese students Boston & MA
2016	\$2.3 billion	\$448 million

Source: Institute of International Education 2016 Open Door Report (2016) and GBCVB research.

Elements of GBCVB China Marketing Initiative: 2013-2016

- GBCVB forms a China-Friendly Marketing Committee comprised of member hotels, restaurants, retailers and MOTT.
- Massport has extraordinary success in winning non-stop service from Beijing, Shanghai and Hong Kong. GBCVB hosts inaugural FAM tours from all 3 destinations.
- Hainan: BOS-Beijing 7x per week (daily), and BOS-Shanghai/PVG 4x per week.
- Cathay Pacific: BOS-Hong Kong/HKG increases from 4x per week to 7x per in March 2017.
- Surge in Chinese students at Boston, Cambridge and MA Colleges and Universities. GBCVB launches Weibo account to engage with students.
- GBCVB organizes a Sales Mission to China with MOTT and member hotels and attractions.



Elements of GBCVB Expanded China Marketing Initiative: 2017 - 2021

- Working with Wynn Boston Harbor to jointly attend trade shows and create a marketing strategy to sell Boston to the Meetings, Incentives, Conference & Exhibitions (MICE) business coming out of China.
- Spearheading trade missions to China and organizing events for Chinese tour operators based in LA and NY who manage and contract destination bookings for China-based partner companies.
- Partnering with MOTT, Massport, and American Express to host China-Friendly workshops and seminars for the hospitality industry.
- Collaborating with Chinese carriers serving Boston to host media and trade FAMs.
- Hiring dedicated Mandarin-speaking staff to oversee and implement China marketing strategies.
- Outreach to Chinese student unions at local colleges and universities to spread brand awareness.
- Destination brand messaging on WeChat.
- Organizing a broader trade mission to China that includes relevant industry sectors such as education, biotech, medical and sports organizations.
- Attending tourism fairs in China.
- Working with local colleges and universities to develop China-Ready curricula for hospitality programs.



GBCVB WeChat Account

- The GBCVB is working with East/West Marketing to launch a WeChat account.
- With over 900 million active users, WeChat is the most prolific social media network in China.
- Social media marketing is the most important channel to reach prospective Chinese visitors – destination imagery and referrals shared on WeChat are the most effective means of luring Chinese visitors.
- 85% of Chinese visitors obtain destination information electronically, and 40% obtain this information from friends. WeChat is a bridge to both channels.
- The advent of WeChat Pay, along with AliPay, has made e-commerce in China the fastest growing mode of payment, with over \$1 trillion in transactions annually.
- Growing the WeChat following and curating compelling content will cost money and resources.



Chinese Visitors to Boston are a Destination Sales Force

- Given the influence of personal recommendations, the GBCVB sees Chinese visitors to Boston as the key audience in growing our market share.
- Exceptional experiences and exemplary service will result in more Chinese visitors coming to Boston based on the referrals of friends and influencers.
- Outreach to colleges and universities to develop training programs and materials for the Boston hospitality industry is crucial.
- Training GBCVB member companies and industry partners on best practices - including translated signage, Mandarin-speaking staff, WeChat and WeChat Pay, and cultural sensitivity – will position Boston to exceed the needs of Chinese visitors, thus turning Chinese visitors into a potential Boston destination sales force.



Preliminary Boston Visitor Industry China-Friendly Checklist

A checklist to make Chinese visitors feel at home during their Boston visit.

Hotels

Chinese language content website
Chinese materials (brochures, maps, travel guide)
At least one Mandarin speaking staff person
<i>Amenities in room:</i> slippers, hot water kettle tea, ramen noodles, toothbrush/tooth paste and CCTV channel(s)
Chinese room service breakfast options(s)
Chinese language newspaper
WeChat account
<i>List of resources in Mandarin:</i>
Closest ATM
Most authentic Chinese restaurants in the area
Best places to bargain shop
Best places for high-end shopping and must see/must do attractions

Restaurants

Chinese language menus with photos
Free WiFi

Retailers

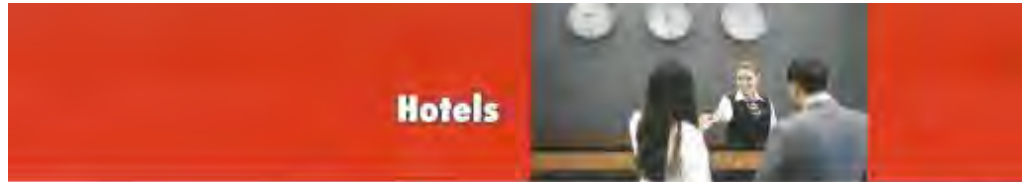
Chinese language content on website
Chinese language materials
WeChat Account
Free WiFi
At least one Mandarin speaking staff person

Attractions

Chinese language content on website
Chinese language materials
WeChat account
Free WiFi
Audio tour in Mandarin
Signs and subtitles in Mandarin
Chinese/Asian food options in on-site restaurant



Hotel Checklist



Chinese preferences in hotels are rapidly shifting. More and more, the Chinese Visitor is moving into high-end properties. While the following amenities are important for all types of hospitality venues, they are critical for attracting the increasing number of millennials and upscale visitors.

Free Wi-Fi – Absolute must. This represents a challenge for many high-end hotels which tend to charge for Wi-Fi. They need to re-think this for the Chinese visitor.

Smoking Area – If possible, it can be outside. In the hotel, ensure you have clear information in Chinese on smoking regulations. Hotels in China that do not allow smoking have signage in the room.

Mobile Signage-Wayfinding/Informational – Some venues have episodic movements of Chinese visitors. Having a deployable China Kit for welcome and way-finding at the property is a sound investment. When the executive from Haler comes to do a site visit, he or she will notice this courtesy.

Chinese Speaking Staff Member – Depending on the volume, this can be a full-time person, or if you're looking at episodic visitation, consider an on-call person. Your local college will probably have some Chinese students to fill these spots.

Chinese Folder on the Hotel – Important! A simple review of the features of the property, ready and available.

Welcome Letter in Chinese – Nothing elaborate, but a simple “Huanying” to the guests when they enter their room.

Informational Videos in Chinese or Chinese Subtitles – Again, merely adding subtitles shows you've take the effort to recognize the importance of the Chinese visitor.

CCTV Global on Cable – This can be accomplished and gives them a taste of home.

In-Room Items – To Chinese, slippers are a necessity, not a perk. A water kettle and Chinese tea are also a must.

Basic Understanding of Cultural Differences – Understanding of cultural differences from colors, room numbers, etc. is the locus of large international hotels that accommodate high Chinese traffic. But for smaller properties, it's important to be aware of these items, but you don't need to take the number 4 off the elevator. They know this is America.

Chinese Menu – At restaurants, it's not hard to have the basic menu created in Chinese. Just make sure that it's in simplified Chinese. Updating the Chinese version as the menu changes can be challenging.



Retail Checklist

Retail Establishments

Size Conversion Charts – Chinese sizes are not the same as U.S. or European ones so have a chart available so the Chinese shopper know what a size 10 equates to in China.

Flyer on the Store/Outlet – A simple map and explanation of each store or department in Chinese makes navigation a lot easier.

Signage in Chinese – Just the important things. Iconic signage is the best, but sometimes putting it into Chinese makes an impression.

Promotional Offers in Chinese – These are very savvy shoppers, and promotions – particularly when offered in Chinese – are a huge attraction.

Shipping Goods to China – Absolutely critical to selling anything larger than a cell phone.

Acceptance of Alipay/Union Pay – This is a must and will make your shoppers more likely to spend. It's essential to put decals near your entrance or on the cash register so they can see that you will be able to accept their payment.

Training Programs for Chinese Guides – In large establishments, consider having guides on hand to assist large movements of Chinese shoppers.

Smoking Area Outside of Store – It's important to have an area where smoking is allowed in proximity to your store.

"Made in U.S." Chinese guests want to buy things that are made in the U.S. or even better, locally. They don't want to go home with an item that says "Made in China".



Summary of Gaming Economic Development Fund Strategies

- Phase 1 (FY 2019): GBCVB Expanded China Marketing Initiative - \$1.6 million
- Phase 2 (FY 2020): Develop marketing, sales, services, and workforce training modules to meet the needs of Chinese visitors. - \$2.5 million
 - Create a grant program for businesses to adopt this module and train employees to be China-ready.
 - Implement a pilot program with 8 Colwen Hotels around Everett and Plainville: Homewood Suites Boston Logan Airport Chelsea, TownePlace Suites Boston Logan Airport Chelsea, Residence Inn Boston Logan Airport Chelsea, AC Hotel Boston Cambridge, AC Hotel Boston North, Fairfield Inn & Suites Boston Cambridge, Hilton Garden Inn Foxborough, Renaissance Boston Patriot Place.
 - Implement a pilot program with the 60-plus retailers and restaurants at Assembly Row.
- Phase 3 (FY 2021): Work with area schools, notably BU, Salem State, and Bunker Hill Community College, to develop China-ready curricula and create scholarships for students enrolling in these programs. Replicate this model at Wrentham Village Premium Outlets, Patriot Place, Plainridge Park Casino and throughout the Commonwealth and New England. - \$3.5 million



THANK YOU!!

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**Greater Boston Convention & Visitors
Bureau**





**GREATER BOSTON
CONVENTION & VISITORS BUREAU**

September 15, 2017

Mr. Bruce W. Stebbins, Commissioner
Massachusetts Gaming Commission
1010 Federal Street, 12th Floor
Boston, MA

Dear Mr. Stebbins and Members of the Gaming Commission,

The Greater Boston Convention & Visitors Bureau (GBCVB) has developed a preliminary strategy for the Gaming Economic Development Fund. As the largest Regional Tourism Council in the Commonwealth, the GBCVB will have 2 casinos within its geographical area: Plainridge Park Casino in Plainville and Wynn Boston Harbor, scheduled to open in Everett in 2019. Our strategy is essentially a two-pronged plan to 1) promote economic development in the region outside the casino walls and 2) create marketing, workforce training, and educational modules and programs that target the tremendous growth in international travel to Boston, notably from China.

The GBCVB also worked with and supports the concept and plan put forth by the towns of Foxborough, Wrentham and Plainville, which has been forwarded to the Commission by the Town of Foxborough. This initiative will leverage specific economic clusters, and special events, to promote job creation, workforce training, tourism marketing, green jobs, STEM programs and higher education scholarships. Additionally, commuter rail service to the area will enhance these efforts and strengthen the collaborative model.

The GBCVB proposes a similar partnership model around Wynn Boston Harbor, where retail, restaurant and hotel development is robust. We will work with our member companies at retail complexes, such as Assembly Row in Somerville, as well as hotel management companies, such as Colwen Hotels, to create a cohesive strategy. Colwen will be a key partner as they manage several properties around Wynn Boston Harbor and at Patriot Place. The partnership, with assistance from the GBCVB, would devise strategies to invest monies from the Fund into tourism marketing and workforce training programs, and create scholarships, internship

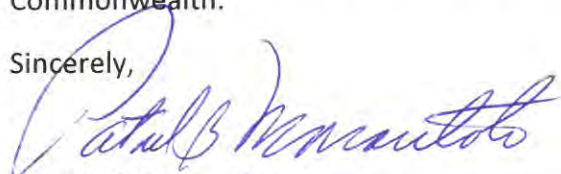
opportunities and summer jobs for local colleges like Bunker Hill Community College and Roxbury Community College.

In terms of workforce training and tourism promotion, the GBCVB's strategy is to create a comprehensive marketing and training module that will focus on the needs of international travelers. This module could be used by other regions in Massachusetts. Overseas visitation to Boston has doubled in the past decade, and all segments of the hospitality industry would benefit from training programs designed to meet the needs of this burgeoning demographic. Visitors from China and India are growing at exponential rates, while workforce training programs are woefully ill-equipped to address the cultural and consumer trends and needs of this new market segment. Using Commission funding, the GBCVB will develop a comprehensive plan to make Boston "China-Friendly" and "China Ready," which is imperative since Chinese visitors have surpassed UK visitors as the number one source market for overseas visitation to Boston, and will soon be the number one source market for Massachusetts. Chinese visitors research and experience a destination in unique ways. China is the most digitized populace in the world and Chinese travelers overwhelmingly make decisions based on peer referrals and influencer trends they see on social media. The preeminence of WeChat, and advent of WeChat Pay, has created an opportunity to reach a consumer audience whose size and spending power is simply unprecedented in the history of travel and tourism.

Regional economic development and the creation of marketing and training modules for workforce training are the twin pillars of our strategy for the Gaming Economic Development Fund. As Boston looks to grow its market share of international visitors and spend, as well as host premier events such as the World Cup in 2026 at Gillette Stadium in partnership with the Kraft Group and the 3 towns of Foxborough, Wrentham and Plainville, this Fund will be a critical resource for funding these initiatives.

I look forward to the public hearing process where we will focus on specific elements of our strategy and plan that will benefit not only our region but potentially other regions of the Commonwealth.

Sincerely,



Patrick B. Moscaritolo

President & CEO

Greater Boston Convention & Visitors Bureau

GBCVB Regional Strategy for Gaming Economic Development Fund

The Greater Boston Convention & Visitors Bureau (GBCVB) has developed a preliminary strategy for the Gaming Economic Development Fund. As the largest Regional Tourism Council in the Commonwealth, the GBCVB will have 2 casinos within its geographical purview: Plainridge Park Casino in Plainville and Wynn Boston Harbor, scheduled to open in Everett in 2019. Our strategy is essentially a two-pronged plan to 1) promote economic development in the region outside the casino walls and 2) create marketing, workforce training and educational programs that target the tremendous growth in international travel to Boston, notably from China.

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burgeoning demographic. Visitors from China and India are growing at exponential rates, while workforce training programs are woefully ill-equipped to address the cultural and consumer trends and needs of this new clientele. Using Commission funding, the GBCVB will develop a comprehensive plan to make Boston “China-Friendly,” which is imperative since Chinese visitors have surpassed UK visitors as the number one source market for overseas visitation to Boston. Chinese visitors research and experience a destination in unique ways. China is the most digitized populace in the world and Chinese travelers overwhelmingly make decisions based on peer referrals and influencer trends they see on social media. The preeminence of WeChat, and advent of WeChat Pay, has created an opportunity to reach a consumer audience whose size and spending power is simply unprecedented in the history of travel and tourism.

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SMART GROWTH AND REGIONAL COLLABORATION

September 15, 2017

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

Dear Commissioner Stebbins:

On behalf of the Metropolitan Area Planning Council (MAPC), I am submitting the following economic development strategies regarding the use of the Gaming Economic Development Fund. MAPC's economic development work is guided by our regional plan *MetroFuture*¹ and the Comprehensive Economic Development Strategy (CEDS)². We believe that economic development should be promoted in a sustainable and equitable manner, and we support programs and funding opportunities that incorporate those values. In particular, we support programs that advance equity, provide high quality jobs with strong career pathways, and help lower-income communities and populations to prosper.

We acknowledge that there are other funds, including the Community Mitigation Fund, associated with gaming in addition to the Gaming Economic Development Fund. There are also Host and Surrounding Community agreements that will address some of the planning needs of the Host and Surrounding Communities most impacted by the development of casinos in the Commonwealth. We have therefore focused our efforts in developing strategies which we believe will be the highest impact within the priorities set forth for this fund.

In some cases, we have recommended that the money from this fund be assigned to existing state programs. However, in order to ensure that the funding benefits the Host and Surrounding Communities to the maximum degree, a certain percentage of any new revenue placed in these state programs must be assigned to applicants within the communities most directly impacted by the respective casino developments.

Strategies and programs are outlined below according to the priorities outlined by the Gaming Commission. It is important to note that these strategies are categorized by those most closely related to the Gaming Commission priorities, but in most cases each advances more than one priority. Throughout the letter, we reference specific examples of ideas and input that we have gathered from communities that will be directly impacted by casinos developed within the MAPC

¹ *MetroFuture* is MAPC's long-term plan for a more prosperous, equitable, sustainable region and guides all of our agency's work. *MetroFuture* identifies 65 goals for the region to achieve by 2030, categorized into six topic areas including Prosperity, Transportation, Sustainable Growth Patterns, Housing Choices, Community Vitality, and Environment.

² The CEDS is developed with funding from the U.S. Economic Development Administration (EDA) and is updated at least every five years. MAPC, as an EDA-designated Economic Development District, coordinates, strengthens, and aligns economic development work throughout the region with the goals and strategies as depicted in the CEDS. These goals and strategies in the CEDS fall into multiple categories: regional collaboration, strengthening key industry and businesses, workforce training and education, transit accessibility and walkability, and creating a diverse, resilient, and equitable economy. The CEDS not only provides a plan and vision for advancing economic development in the region, but also creates a framework that guides EDA funding decisions.

region. We also acknowledge that we are submitting a number of ideas that will likely exceed the capacity of this fund.

Workforce Development

Regarding workforce development, MAPC believes in the importance of maintaining a strong supply of educated and skilled workers of all ages to encourage businesses to locate and expand here. We have identified the importance of workforce development programs tailored to quality jobs with career pathways as a particular strategy within the CEDS.

Two critical components of workforce development in Massachusetts are the Workforce Competitiveness Trust Fund (WCTF) and the Massachusetts High Demand Scholarship. The WCTF has provided thousands of unemployed individuals with the skills needed to meet current workforce demands. The fund trains workers for in-demand jobs and creates pathways to better-paying jobs. It is particularly targeted at improving outcomes for low-income individuals and low-wage workers. Investment in this fund could help to support workers in casino jobs, service sector jobs that support the casino, as well as other low-income individuals living and working in the Host and Surrounding Communities in order to enhance their financial stability and improve their career pathways. The WCTF often funds regional partnerships that include local businesses, community-based organizations, and educational and workforce development organizations. The additional monies placed in this fund should particularly reward efforts to place low income workers from under-served communities in jobs with strong career pathways. Many of the Host and Surrounding Communities are Gateway Cities or face similar challenges of disinvestment. In other cases, the Host or Surrounding Communities may have strong public transit connections with communities or neighborhoods that are under-served and in need of better job opportunities. Supporting the WCTF with monies from the Gaming Economic Development Fund would help to advance the following priorities as outlined by the Gaming Commission: workforce training and regional economic development initiatives.

The Massachusetts High Demand Scholarship awards scholarships to community college students at public post-secondary institutions who choose to major in high-demand fields such as engineering, technology, and healthcare. It is critical to guide and encourage our college students to choose career fields that will provide future employment stability by matching the needs of employers already located in our Commonwealth and those we hope to attract with the many advantages present in Massachusetts. The Massachusetts High Demand Scholarship helps to do just that. Unfortunately, this program has seen steadily decreasing funding and would benefit from additional monies from the Gaming Economic Development Fund. This fund ties together a number of the Gaming Commission priorities including workforce training, higher education scholarships, and Science, Technology, Engineering, and Math (STEM).

Efforts to place workers who are in low income and under-served Host or Surrounding Communities as well as low income and under-served communities that have clear public transit access to Host and Surrounding communities should be emphasized.

Green Jobs

The Massachusetts Clean Energy Center (MassCEC) has provided green job training programs that prepare unemployed and underemployed people for jobs in the fast-growing clean energy industry cluster. Through the Learn and Earn program, MassCEC allows providers to conduct classroom instruction and to provide summer job opportunities to students interested in pursuing a clean energy job in the future. They also have a successful Women in Clean Energy program that is designed to help low and moderate income female workers to build careers in the clean energy industry.

Through MassCEC's grant program, the Economic Development and Industrial Corporation leads the Metro Boston Green On-the-Job Training (GOJT) Collaborative, a partnership of clean energy employers, municipalities, workforce boards, career centers and training providers who train and place underemployed and unemployed residents from 64 communities in Metro Boston in on-the-job training experiences leading to full-time permanent employment. Additional grant funding to MassCEC from the Gaming Economic Development Fund would help to expand or create additional cross-sector partnerships to advance Gaming Commission priorities such as the workforce development priorities along with green jobs promotion, STEM, and summer jobs.

Tourism Promotion/Cultural & Recreational Attraction Promotion

MAPC recognizes the importance of supporting arts and culture as both a community development and economic development tool. Efforts to support arts and culture are under-funded across the Commonwealth, and although a certain percentage of the taxes on gross gaming revenue are already being directed to the Mass Cultural Council, MAPC supports additional funding from the Gaming Economic Development Fund being directed to MCC. MCC's grant programs support cultural activities that have the capacity to revitalize communities, stimulate income, create or enhance jobs, and attract tourism. The creation of an entertainment complex within Wynn Boston Harbor may adversely affect existing tourism attractions, such as the Lynn Auditorium, a large Art Deco building that defines the civic heart of Lynn, and the 1,800 seat Chevalier Theatre in Medford. Additional funding for MCC programs, including the Cultural Facilities Fund, would help to support these existing institutions after the casino is developed.

Some of the Host and Surrounding Communities within the MAPC region have already been talking with one another in order to identify regional approaches to attracting more tourists to their region. For example, Foxborough, Wrentham, and Plainville have already developed a concept to work together around regional tourism. We are strongly supportive of multi-community proposals that address jobs, tourism, and transportation issues.

Regional Economic Development Initiatives

As a Regional Planning Agency, MAPC believes in the critical importance of linking smart growth with economic development. We have worked with a number of our communities, including those surrounding the Wynn Casino Development in Everett, to map out Priority Development Areas (PDA) and Priority Preservation Areas (PPA). PDAs identify sites with the most significant economic

and mixed-use development potential. Communities who have conducted forward-thinking land use planning should be supported in their efforts to implement these plans. Some of the monies from the Gaming Economic Development Fund should go to the Host and Surrounding Communities that have mapped PDA's and PPA's, identified sites for economic development and multi-family housing production, and worked to update zoning to encourage redevelopment and investment. Since the funding is limited, it should be actively targeted at those communities that are pursuing implementation of PDA and PPA planning.

In particular, some of this funding should augment efforts to plan for and build affordable housing. Many of the employees working at the casino will need access to affordable workforce housing. In addition, the investment associated with the casino has the potential to inflate rents and sales prices in the vicinity, leading to displacement. This is a particular concern in the communities surrounding the Wynn Casino, where some of the increasingly rare "naturally occurring affordable housing" (NOAH) can be found. Since the funding is limited, the monies from the Gaming Economic Development Fund can go towards providing technical assistance to implement housing plans, towards funding the preservation of existing affordable housing stock, and towards necessary design work for the infrastructure that could support this type of development. This could be done through existing municipal rehab programs or through grants to Community Development Corporations (CDC's) and Community Action Agencies (CAA's). We feel that affordable workforce housing is a critical piece of economic development in Massachusetts. If we want to fill jobs, workers need to be able to find affordable homes within a reasonable distance of their place of employment. Rewarding communities who have thoughtful planning practices in place and who are driven to produce and preserve affordable housing is a strategy to support the economic development efforts of the Host and Surrounding Communities.

These resources could be added to a new fund explicitly for these purposes and managed by the Gaming Commission.

Summer Jobs

Summer jobs programs help teens and young adults, many from low socio-economic status communities get the skills and experience needed to find and keep jobs. Communities provide employment, mentoring, and character-building activities for youth through community collaboration with local organizations, city government, community parks and businesses. Funding currently comes through grants and partnerships with local businesses. Jobs range from clerical jobs and parks to jobs at local law offices, banks and insurance companies. Jobs could also be at businesses that directly support or have synergy with the casino development. An added benefit of summer jobs program is that local communities are able to create and bolster relationships with local businesses by establishing connections through programs such as these while at the same time providing much-needed mentoring and skills development for local youths. Although there are an extensive amount of applicants for these programs, there is not enough funding to hire most of them. This is particularly the case in Lynn where they always have more applicants for their summer programs than they can support. Their program typically gets 300-400 applicants and they can only fund 120 participants. Monies from the Gaming Economic Development Fund should

be directed to under-funded summer job programs that the Host and Surrounding Communities already have in place.

Support for Small Businesses

The CEDS also speaks to the critical importance of creating policies and programs that support current and prospective small business owners. Some provisions to support small businesses have been put in place through Surrounding Community & Host Community agreements negotiated between individual communities and the casino developers. In the case of Wynn Resorts Limited (Wynn), these provisions include the use of local contractors and suppliers in its project, consulting with local business groups and chambers of commerce on economic opportunities, advertising for and hiring local workers, and maintaining a proprietary concierge program to promote the cultural, historical, and entertainment attractions in the region. In some cases Wynn has also agreed to coordinate with local communities to include local charities and nonprofits in its charitable donations and to offer local businesses the opportunity to market their goods and services to Wynn's employees via the WE Save Program. These provisions should be strengthened to ensure that they are taking place and are consistently implemented across all of the Host & Surrounding Communities.

MAPC also strongly supports the Small Business Technical Assistance (SBTA) Program. The Small Business Technical Assistance Grant Program helps small businesses to succeed in underserved communities in the Commonwealth, particularly low- to moderate-income communities and communities of color. It is particularly well suited to serve many of the small businesses within the communities surrounding the Wynn Casino development. The program provides funding to not-for-profit grantees, including CDC's or Community Development Financial Institutions (CDFIs), who offer a range of technical assistance and financial services to small business clients. The fund helps to build operational capacity and skills of organizations that are providing technical assistance, education, and access to capital to small businesses, including many owned by women, minorities and veterans. MAPC has done a Health Impact Assessment on this fund and found that in addition to the economic benefit, the program also provides a protective health benefit for business owners, small business employees, and residents in the communities that the SBTA program serves. Between FY2014 and FY2018 there has been a decrease of \$1.25 million (or 62.5%) in funding for this program. The funding could be utilized for business planning, education, and access to capital for small businesses impacted by the Casino development.

Small businesses in many of these communities also have a need to upgrade their building stock as many of the commercial buildings are the biggest contributors to greenhouse gases and in many cases are also vulnerable to the impacts of climate change. Some of the funding from the Gaming Economic Development Fund could be used to support municipal programs that would administer no interest loans or loans with principal buy-downs for upgrades of small commercial properties of businesses, in order to reduce energy-use or add resiliency elements.

Agricultural Development

The CEDS also makes the case for the importance of supporting local agriculture and the agriculture industry in the region. MAPC recently led development of the Massachusetts Local Food Action Plan, which includes strategies for supporting agricultural development programs. One program that should be prioritized for additional funding from the Gaming Economic Development Fund is the Healthy Incentives Program (HIP).

The Healthy Incentives Program (HIP) matches SNAP purchases of local fruits and vegetables when participants are shopping at farmers markets, farm stands, mobile markets, and CSA farm share programs. Customers who use SNAP dollars on farm fresh fruits and vegetables at participating HIP retailers will see the amount of their purchase instantly added back to their EBT card. The program not only increases the purchasing power of lower-income residents, but it has the additional benefit of bolstering farmers markets and thereby supporting local farms. The HIP program is funded through 2020 through a federal grant, but MAPC believes that this program should be established and made permanent through Massachusetts state law. A certain percentage of the additional funding should be dedicated back to the Host and Surrounding Communities in order to support agricultural development in the communities that will be most impacted.

Thank you for the opportunity to submit these strategies. We look forward to the opportunity to continue this conversation.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Draisen". The signature is fluid and cursive, with a prominent initial "M" and "D".

Marc Draisen
Executive Director