

#MGGC200



MASSACHUSETTS GAMING COMMISSION PUBLIC MEETING #200

SEPTEMBER 22, 2016
10:00am

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



NOTICE OF MEETING and AGENDA

September 22, 2016

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, September 22, 2016

10:00 a.m.

Massachusetts Gaming Commission

101 Federal Street, 12th Floor

Boston, MA

PUBLIC MEETING - #200

1. Call to order
2. Approval of Minutes
 - a. August 18, 2016 – VOTE
3. Commissioner's Updates
 - a. 200th Commission Meeting
 - b. Commissioner Reports
4. Ombudsman Report – John Ziemba
 - a. MGM Springfield Quarterly Report – Mike Mathis, President; Brian Packer, Vice President Construction/Development; Seth Stratton, Vice President and General Counsel and Jed Nosal, Brown Rudnick
5. Research and Responsible Gaming – Mark Vander Linden, Director
 - a. The Construction of Plainridge Park Casino: Spending, Employment and Economic Impacts – Rod Motamedi, UMass Donahue Institute
6. Administrative Update – Karen Wells, Deputy Director
 - a. Fiscal Year 2016 Closeout Report and Fiscal Year 2017 First Quarter Update – D. Lennon, Chief Financial and Accounting Officer
 - b. Building Security Changes



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com

7. Racing Division – Alex Lightbown, Director of Racing/Chief Veterinarian
 - a. Suffolk Downs Capital Fund Requests – **VOTE**
 - b. Quarterly Local Aid Payments – **VOTE**
 - c. Raynham/Suffolk Downs Payment Discussion
 - d. Plainridge Park Racecourse Racing Official Approval – **VOTE**

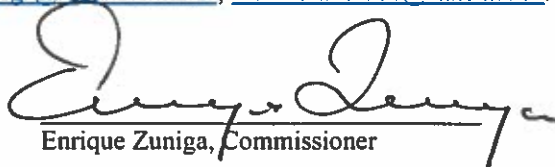
8. Investigations and Enforcement Bureau – Karen Wells, Director
 - a. 205 CMR 134.00 Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations Amendments – Begin Formal Promulgation Process – **VOTE**
 - b. MGM Qualifier Suitability Determination – **VOTE**
 - c. Primary Gaming Vendor Suitability Determinations – **VOTE**
 - d. Licensing Regulation Review Discussion

9. Legal Division – Catherine Blue, General Counsel
 - a. 205 CMR 6.00 – Pari-Mutuel Rules for Thoroughbred Racing, Harness Racing, and Greyhound Racing (Pentafecta Pool) - Amended Small Business Impact Statement - **VOTE**

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.

9/19/16
DATE


Enrique Zuniga, Commissioner

Date Posted to Website: September 20, 2016 at 10:00 a.m.



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



Meeting Minutes

Date/Time: August 18, 2016 – 10:00 a.m.

Place: Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts

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

[10:00 a.m.](#) Chairman Crosby called to order the 198th Commission meeting.

Approval of Minutes

See transcript pages 2-3

[10:00 a.m.](#) *Commissioner Macdonald moved for the approval of the August 1, 2016, Commission meeting minutes subject to any corrections, typographical errors, or other nonmaterial matters. Chairman Crosby noted that a correction was needed at 12:36 p.m. in the minutes and to change the reference of a West Virginia conference to a West Virginia court decision. Motion seconded by Commissioner Cameron. Motion passed unanimously.*

Commissioner's Update

See transcript pages 3-4

[10:03 a.m.](#) Chairman Crosby noted that the Commission meetings in September will be held on the 8th and the 22nd. Commissioner Stebbins noted that the next Access and Opportunity Committee meeting will be held in Springfield.

Racing Division

See transcript pages 4-31

[10:04 a.m.](#) Commissioner Cameron, representing the Commission on the Horse Racing Committee, reported that the harness horsemen requested a reevaluation of the split of the funds in the Race Horse Development Fund between the standardbreds and the thoroughbreds. She also reported on the recommendation of the Horse Racing Committee. She stated that each industry was asked to submit a report and state their needs. The Horse Racing Commission decided to change the split to 55% for the standardbreds and 45% for the thoroughbreds. The previous split was 25% for the standardbreds and 75% for the thoroughbreds. Commissioner Cameron stated that the Horse Racing Committee also recommended that the split be retroactive to January 1, 2016, because the committee was not able to meet for over a year due to a delay in reappointment of committee members.

[10:08 a.m.](#) Peter Goldberg, representing the standardbreds on the Horse Racing Committee, noted that the split should be reviewed annually, at the end of the racing season in October, to consider any landscape changes. He stated that in 2015 the thoroughbreds were not going to race 90 days and that is why a split review was requested. He stated that the Horse Racing Committee should have met in 2015 but was unable to meet because they lost two members, which were not reappointed until 2016. He stated that the Horse Racing Committee thought that making the split retroactive to January 1st was fair and equitable.

The Commissioners discussed the retroactivity of funds.

[10:29 a.m.](#) *Commissioner Zuniga moved that the Commission accept the Horse Racing Committee recommendation to change the split, as presented in the recommendation – 55% to the Standardbreds and 45% to the thoroughbreds, retroactive to January 1, as the committee recommended. Motion seconded by Commissioner Cameron. Motion opposed by Commissioners Macdonald and Stebbins. Motion passed 3 to 2.*

Commissioner Macdonald noted that his opposition was not to the split but to the retroactivity of funds. Commissioner Stebbins concurred.

10:30 a.m. The Commission took a short recess.

10:34 a.m. The meeting resumed.

Ombudsman Report

See transcript pages 32-168

[10:34 a.m.](#) Ombudsman John Ziemba provided an update which included work with MGM and Wynn as construction increases, notification of community fund application determinations, drafting grant contracts, and monitoring permitting approvals.

[10:36 a.m.](#) Robert DeSalvio, President of Wynn MA, LLC, reported that Wynn Boston Harbor is now under construction! He also stated that the Wynn Quarterly report will include permitting, construction, and an enhanced version of their diversity update.

[10:38 a.m.](#) Chris Gordon, President for Wynn Design and Development Massachusetts, provided an update on the following: permitting (state, federal, local); design (foundation, tower and podium); construction (bids, aerial photos, access road, utilities, foundation, railroad track, construction workers event, tours, and labor logistics); off-site infrastructure; and project schedule (project snapshots, steel erection, excavation, pouring slab, hotel structure, garage, finishes, and façade).

[10:55 a.m.](#) Jennie Peterson, Manager of Development at Wynn MA, LLC; Brian McPherson, Director of Diversity with Suffolk Construction; and Shelley Webster, Suffolk Construction's Compliance Officer for Wynn Boston Harbor, reported on their engagement with the trades and their efforts to build a diverse and local workforce. They also reported on the following community engagement initiatives: Massachusetts Girls in Trades event designed to develop contacts and offer opportunities for careers after high school; work with one-stop career centers for trade information, trainings, and application assistance; establishment of walk-on application process; application notifications; collaboration with community groups for pre-apprenticeship programs; small business opportunities; tracking methods; and recognition programs.

Robert DeSalvio also noted attendance at numerous community events and meetings listed in the packet for the Commissioner's review.

[11:41 a.m.](#) Ombudsman John Ziemba requested to reverse the agenda order and present on the Springfield grant before taking up the Plainridge Park Casino quarterly report. Ombudsman Ziemba provided an update on the Springfield Community Mitigation Grant and Caring Health Center parking matter. He stated that the Commission authorized up to \$150,000 for a pilot valet parking program. He also stated that the Commission staff worked with the City of Springfield and MGM to determine the best method to address parking and they decided to pursue the option of a shuttle service. The community mitigation funding team recommended that the Commission provide additional authority for the Springfield grant to be used for a shuttle service. They will continue dialogues and evaluate parking.

[11:56 a.m.](#) Tania Barber, President and CEO of Caring Health Center, expressed concerns about the shuttle program and stated that it may be appropriate for surrounding businesses and employees, but not for the sick, aging patients, or large families. She also noted that due to construction there are problems with handicap access to the building. She stated that the valet parking program is in the best interest of Caring Health Center and she asked that the Commission keep an open mind. She also noted that she would like to be part of the conversations to express areas not being looked at.

[12:17 p.m.](#) *Commissioner Stebbins moved that the Commission direct the Ombudsman and MGC staff to enact a program, as has been discussed, for a three-month basis, at a total cost of \$50,000 for the first 90 days, and instruct staff to continue to work with the city, applicant parties, and other stakeholders to monitor and come back to us in 90 days with any potential recommendations, or earlier if there's significant changes that need to be made. Motion seconded by Commissioner Macdonald. Motion passed unanimously.*

12:18 p.m. The Commission took a short recess.

12:24 p.m. The meeting resumed.

[12:24 p.m.](#) Mike Thoma, Slots Director with Plainridge Park Casino, presented on the Plainridge Park Casino Quarterly Report and provided an update on employment status, diversity hiring, promotions, transfers, revenue and taxes. Purchasing Manager Eli Huard presented on spend by state, local spend, and vendor diversity spend. Compliance Manager Lisa McKenney reported on compliance with regulations pertaining to underage guests.

[12:37 p.m.](#) Michele Collins, Vice President of Marketing at Plainridge Park Casino, reported on lottery sales. She also reported on local charitable contributions (Relay for Life and Doug Flutie Jr Foundation for Autism); partnerships and sponsorships (Xfinity concert series, Wrentham Outlet road trip expo, and MA Coalition of Police event at Patriot Place); and events and promotions (partnership with Bass Pro Shops, Wizard of Oz necklace giveaway, Marquee Rewards Universal Benefits, live derby and stake races, and motorcycle and Mustang giveaway). She also reported on the third quarter marketing which included the following: charter bus run, Responsible Gaming Education Week, the Flutie Brothers Band, VIP events at local businesses, and giveaways (Tiffany gift, Brad Paisley meet-and-greet, and large vehicles).

[12:47 p.m.](#) Eli Hurd reported on second quarter highlights which included: a video poker sign installation, capital improvements to the paddock and barn, and installation of a high-definition video tote board for the racecourse. He noted that in the third quarter they will upgrade the garage lighting.

12:50 p.m. The Commission recessed for lunch.

1:30 p.m. The meeting resumed.

Investigation and Enforcement Bureau (IEB)

See transcript pages 169-309

[1:30 p.m.](#) Loretta Lillios, Chief Enforcement Counsel and Deputy Director, presented on the applications for Wynn key gaming executive licenses. She provided a summary of the educational and professional backgrounds of the following individuals hired by Wynn MA: Douglas Neithold, Director of Casino Finance; Gregory Dauenhauer, Vice President and Chief Information Officer of Information Technology; and Michael Carrazza, Director of Compliance and Corporate Investigations. She reported that the required forms and documents were submitted, background checks were conducted, and the IEB found the individuals suitable and recommended approval for licensure.

[1:37 p.m.](#) *Commissioner Cameron moved that the Commission approve all three Wynn employees [Douglas Neithold, Gregory Dauenhauer, and Michael Carazza]. Motion seconded by Commissioner Stebbins. Motion passed unanimously.*

[1:37 p.m.](#) Loretta Lillios, Chief Enforcement Counsel and Deputy Director, presented on the suitability of two MGM qualifiers – Jorge Perez and Theodore Whiting. She provided a summary of their educational and professional backgrounds. The IEB conducted background reviews and recommended a finding of suitability.

[1:42 p.m.](#) *Commissioner Stebbins moved that the Commission approve Theodore Whiting and Jorge Perez as individual qualifiers for MGM Resorts. Motion seconded by Commissioner Macdonald. Motion passed unanimously.*

[1:42 p.m.](#) Director Karen Wells presented on proposed changes to the licensing regulation - 205 CMR 134. She reported that the changes are based upon internal experiences with the opening of a casino, review of best practices in other jurisdictions, and input from licensees and stakeholders. She stated that the changes will help make them more efficient with the opening of larger casinos. Director Wells stated that the changes fall into the following categories: efficiencies and best allocation of resources, process, and clarification. She also noted that they made minor technical corrections throughout the regulation.

Karen Wells, Loretta Lillios, and Director of Licensing Paul Connelly went through the changes which included the following: a requirement that a casino confirm that there's a potential business relationship with a vendor registrant before they register; a provision for an efficient formal process to close out a license application; discretion to designate a nongaming vendor as a gaming vendor secondary to conduct a more in-depth investigation (Commissioners discussed factors for consideration and Commissioner Zuniga proposed including Director Jill Griffin to look at impact on diverse vendors); scoping requirements for gaming vendors; streamline forms; creation of a de minimus exemption (nongaming vendors who do not hit a minimum threshold, do not have to register with the Commission); direct the IEB to approve or deny applications for key gaming executives and primary vendor applicants; and provide the opportunity for an applicant with prior convictions to demonstrate rehabilitation.

3:16 p.m. The Commission took a short recess.

3:22 p.m. The meeting resumed.

[3:22 p.m.](#) Paul Connelly continued his presentation on proposed changes to 205 CMR 134, which included clarifications on timing of licensure, removal of references to gaming establishments and replace with gaming licensees, removal of word professional and insert lobbying, consolidation of required union organization forms, and correction to references. Loretta Lillios reported on a change to include reference to hearing regulations in 205 CMR 101.

General Counsel Blue suggested posting the regulation amendments for informal public comment.

Legal Division

See transcript pages 309-312

[3:51 p.m.](#) General Counsel Blue presented on the Small Business Impact Statement for regulations 205 CMR 134 (fingerprinting amendment), and 205 CMR 138, 144, and 145 (slot machine amendments); and requested approval to take the regulations through the promulgation process.

[3:53 p.m.](#) *Commissioner Stebbins moved that the Commission approve the Small Business Impact Statement ("SBIS") for the amendment to 205 CMR 134: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and*

Labor Organizations as included in the packet; and authorize staff to take all necessary steps to file the SBIS with the Secretary of the Commonwealth and proceed with the regulation promulgation process. Motion seconded by Commissioner Cameron. Motion passed unanimously.

Commissioner Stebbins moved that the Commission approve the Small Business Impact Statement for 205 CMR 138: Uniform Standards of Accounting Procedures and Internal Controls, 205 CMR 144: Approval of Slot Machines and Electronic Gaming Equipment and Testing Laboratories, and 205 CMR 145: Possession of Slot Machines, as included in the packet; and authorize staff to take all necessary steps to file the SBIS with the Secretary of the Commonwealth and proceed with the regulation promulgation process. Motion seconded by Commissioner Cameron. Motion passed unanimously.

Other Business Not Reasonably Anticipated

See transcript page 313

[3:54 p.m.](#) *Having no further business, a motion to adjourn was made passed unanimously.*

List of Documents and Other Items Used

1. Massachusetts Gaming Commission, Notice of Meeting and Agenda dated August 18, 2016
2. Massachusetts Gaming Commission, Draft Meeting Minutes dated August 1, 2016
3. Wynn Boston Harbor Quarterly Report - PowerPoint Presentation
4. Plainridge Park Casino Quarterly Report - PowerPoint Presentation
5. *Draft* 2016 Community Mitigation Fund Reserve/Specific Impact Grant (City of Springfield)
6. Massachusetts Gaming Commission, Memorandum dated August 18, 2016 regarding Recommendations of the Horse Racing Committee, with attachments
7. Draft amendments to 205 CMR 134:00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations
8. Small Business Impact Statement for 205 CMR 134: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations
9. Small Business Impact Statement for 205 CMR 138: Uniform Standards of Accounting Procedures and Internal Controls, 205 CMR 144: Approval of Slot Machines and Electronic Gaming Equipment and Testing Laboratories, and 205 CMR 145: Possession of Slot Machines

/s/ Catherine Blue
Catherine Blue, Assistant Secretary

No Documents

**Massachusetts Gaming Commission
Quarterly Report Presentation:
2nd Quarter 2016**

September 22, 2016



Mike Mathis

President & COO - MGM Springfield





What do these cities have in common?

1. Boise, ID
2. Omaha, NE
3. Madison, WI
4. Grand Rapids, MI
5. Miami, FL
6. Fort Myers, FL
7. Orlando, FL
8. Durham, NC
9. Greensboro, NC
10. Springfield, MA

10 OVERLOOKED CITIES WHERE BUSINESS OPPORTUNITIES ARE RISING

CNBC MAKE IT.

HOME ENTREPRENEURS LEADERSHIP CAREERS MONEY SPECIALS SHOWS

MAIN STREET
Small businesses are saving our
Coming soon: An original series about one small town
Deluxe's Amanda Brinkman and Shark Tank's
[LEARN MORE](#)

10 OVERLOOKED CITIES WHERE BUSINESS OPPORTUNITIES ARE RISING 6 / 12

Springfield, Massachusetts



Source: Doug Kerr | Flickr

The Simpsons™ chose Springfield as a hometown for the average American connotation of the name — *it's not true that every town has a Springfield, but 35 states do* — but that knock doesn't do the Massachusetts' Springfield justice as a business hub. While the city sits in the lower part of the Pioneer Valley surrounded by fertile farmland and expansive forests, the city is continuing to develop as an urban business center, in particular for true small businesses.

The city's recent FutureCity 2026 report noted that three-quarters of *Springfield's companies are small businesses with fewer than four employees*, 20 percent higher than the Massachusetts and nationwide averages.

Major corporate projects are under way, including the Chinese rail company CRRC MA's new railcar factory and the MGM Springfield casino project. To appeal to a broader range of businesses, the city brought in consultant Newmark Grubb Knight Frank to develop the long-term economic plan. *The consultant identified the city's 10 biggest selling points* — among them, proximity to major population centers, transportation logistics, higher education and a low cost of living and housing — but also cited major weaknesses, including high property tax and utility rates and a limited skilled workforce.

August 25, 2016

Brian Packer

Vice President - Construction/Development



Construction Update



OVERALL SITE PROGRESS



Overall Site Activity - June 28, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

OVERALL SITE PROGRESS



Aerial View - April 22, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.



Aerial View - June 26, 2016

PARKING GARAGE



Garage Construction - June 6, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.



Garage Construction - June 8, 2016

PARKING GARAGE



Garage Construction - June 24, 2016



Garage Construction - June 24, 2016



Garage Construction - June 25, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

PODIUM EARTHWORK & FOUNDATIONS



Backfill Along Main Street - June 1, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.



Mass Excavation - June 9, 2016

PODIUM EARTHWORK & FOUNDATIONS



Podium Footings Prepared - June 21, 2016



Podium Footings Prepared - June 21, 2016



Podium Footings Prepared - June 25, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

FRENCH CHURCH NEW FOUNDATION



New Church Foundation - May 6, 2016



New Church Foundation - May 17, 2016



New Church Foundation - May 17, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

FRENCH CHURCH NEW FOUNDATION



New Church Foundation - June 20, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.



New Church Foundation - June 28, 2016

DEMOLITION - ARMORY REAR PORTION



Armory Demolition - May 5, 2016



Armory Demolition - May 5, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

DEMOLITION - ARMORY REAR PORTION



Armory Back Demolition - May 6, 2016



Armory Back Demolition - May 6, 2016



Armory Back Completion - May 26, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

DEMOLITION - 73 STATE STREET REAR PORTION



73 State Demolition - June 20, 2016



73 State Demolition - June 21, 2016



73 State Demolition - June 24, 2016

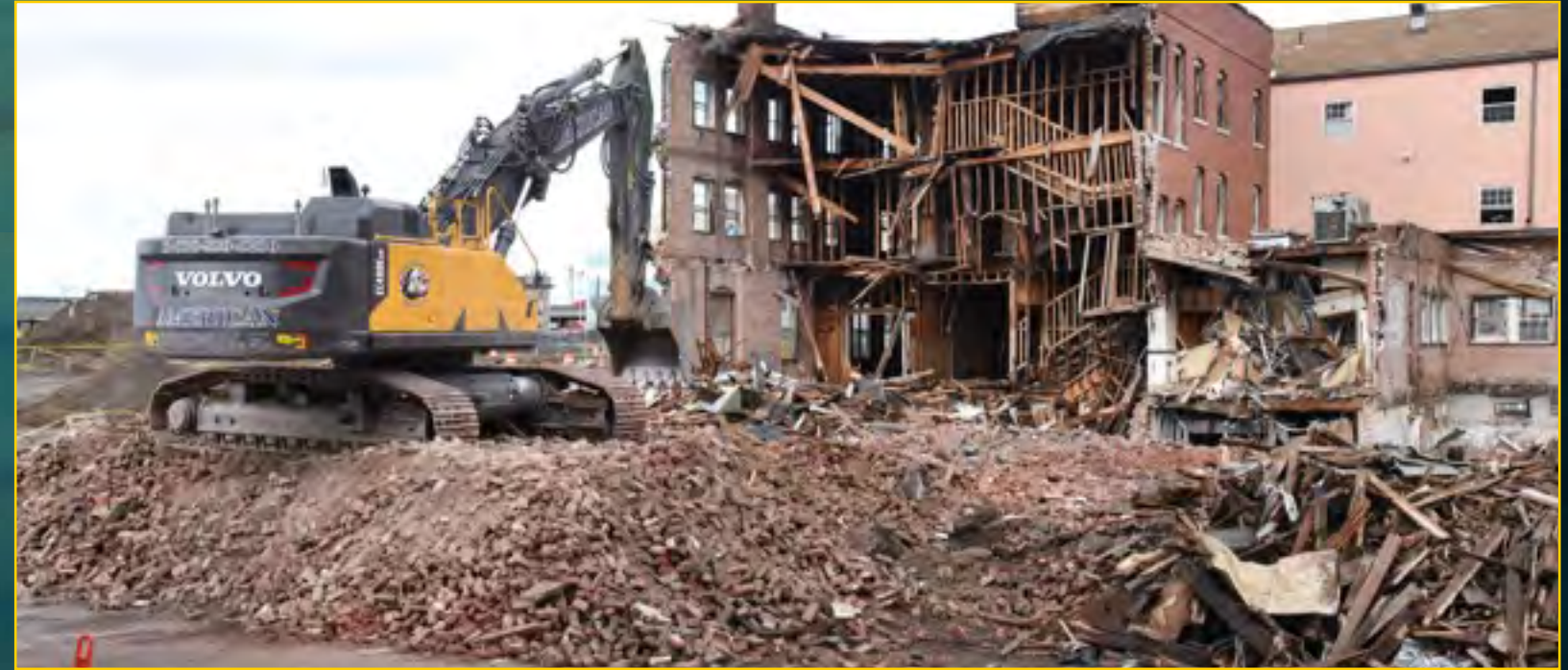
Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

DEMOLITION - YWCA



YWCA Demolition - April 5, 2016



YWCA Demolition - April 8, 2016



YWCA Demolition - April 21, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

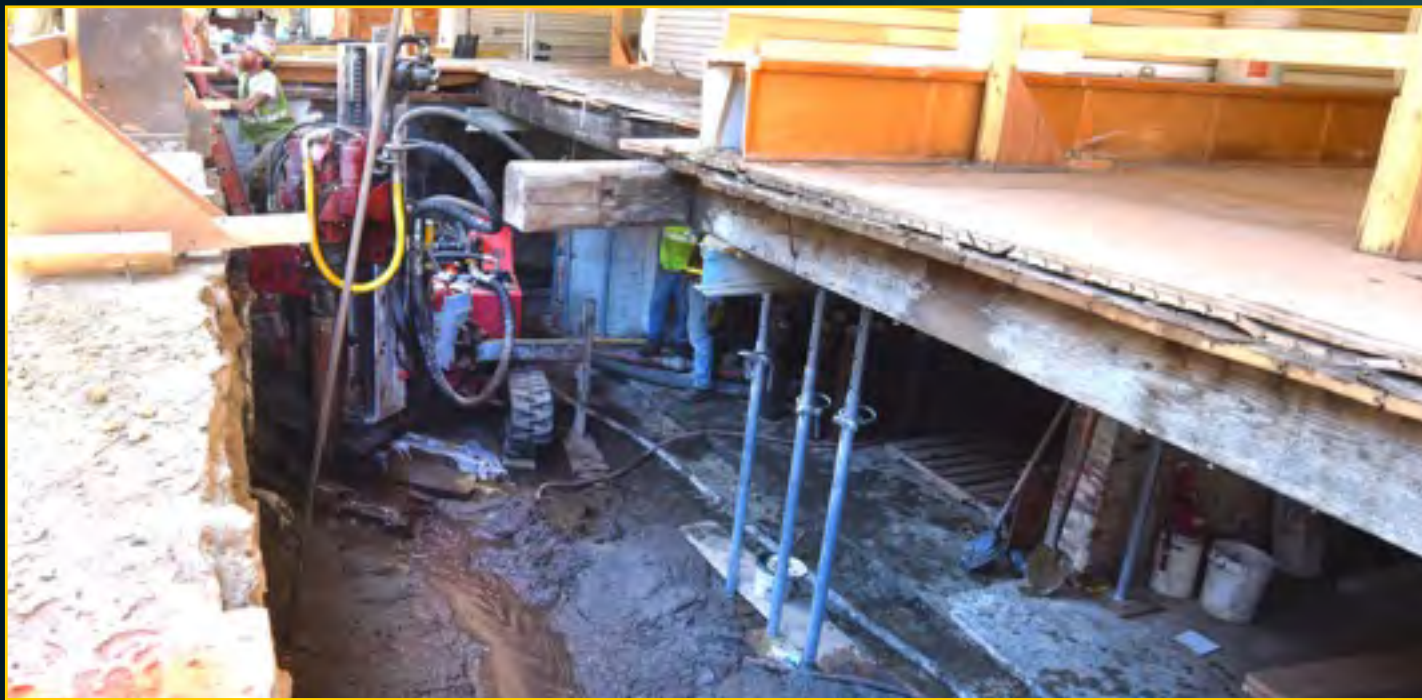


YWCA Site Cleared - April 27, 2016

UNION CHANDLER FACADE STABILIZATION



Union Chandler - May 6, 2016



Union Chandler - June 21, 2016



Union Chandler - May 17, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

95 STATE STREET INTERIORS



95 State St.- June 13, 2016



95 State St.- June 13, 2016



95 State St.- June 20, 2016

Notes:

- (1) Reference Quarter 2 2016 Status Report Section 5a and 5b.

SITE UTILITY/UNDERGROUND WORK



Vault Progress - May 24, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 5a and 5b.



New Valve Work at Union Street Water Main - June 13, 2016

SCHEDULE

- Final project schedule was submitted to MGC on November 6, 2015.
- Monthly updates were provided on:
 - May 4, 2016
 - May 29, 2016
 - July 3, 2016

Notes:

(1) Reference Quarter 2 2016 Status Report Section 1a and Appendix A.

Seth Stratton

*Vice President & General Counsel
- MGM Springfield*



Q2 2016 COST ESTIMATE (\$mm)

Ref	Description	Incurred To Date	Remaining	Total Estimate
1	Construction / Design	\$60.4	\$436.3	\$496.7
2	FF&E	\$0	\$75.0	\$75.0
3	OSE	\$0	\$43.7	\$43.7
	Subtotal of Eligible Capital Costs	\$60.4	\$555.0	\$615.4
4	Land	\$49.5	\$1.8	\$51.3
5	Off-site Parcel Improvements	\$11.2	\$0.2	\$11.4
6	License/ Application Fees	85.0	\$0	\$85.0
7	Pre-opening Expenses / Host Community Costs	\$34.0	\$88.5	\$122.5
8	Financing Costs / Capitalized Interest	\$8.2	\$60.3	\$68.5
9	Project Contingency	-	\$35.0 - \$41.8	\$35.0 - \$41.8
	Subtotal of Ineligible Costs	\$187.9	\$185.8 - \$192.6	\$373.7 - \$380.5
	Total	\$248.3	\$740.8 - \$747.6	\$989.1 - \$995.9

Notes:

(1) Majority of Contingency will be spent on Eligible Capital Costs.

(2) The figures above are approximations to the nearest hundred thousand, which in some instances results in minor discrepancies (\$100k or less) in sums.

(3) Reference Quarter 2 2016 Status Report Section 3 and Appendix D.

Brian Packer

Vice President - Construction/Development



Diversity Update



DESIGN & CONSTRUCTION COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Variance	Company Count	Value
WBE	10.0%	13.2%	3.2%	40	\$25.75M
MBE	5.0%	6.6%	1.6%	24	\$12.91M
VBE	2.0%	6.4%	4.4%	10	\$12.56M

Notes:

- (1) Total Commitments through June 30, 2016 are \$192.2M.
 - (2) Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
 - (3) Reference Quarter 2 2016 Status Report Section 2a and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	12.3%	14	\$4.08M
MBE	5.0%	11.2%	13	\$3.72M
VBE ⁽³⁾	2.0%	2.9%	2	\$0.96M

Notes:

- (1) Total Commitments through June 30, 2016 are \$33.3M.
- (2) Includes companies that are certified with the following agencies:
- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
- (3) Value for VBE (Stevens & Associates) is included in the Construction Commitments because they are being billed through Tishman.
- (4) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
1	AI Engineers, Inc.	Construction Engineering and Inspection	Middletown, CT	MBE
2	AAC Investments, LLC	Interior Design	Los Angeles, CA	WBE
3	AFO Project Consulting, LLC	Construction Consulting	Las Vegas, NV	VBE
4	Akal Engineering, Inc.	MEP Consulting Engineering Services	Berlin, MA	MBE
5	Andelman & Lelek Engineering, Inc.	Energy Modeling	Norwood, MA	WBE
6	Black Hawk Group	Consulting Engineer Services	Philadelphia, PA	MBE
7	C&C Consulting Engineers, LLC	Structural Peer Review	Allston, MA	MBE
8	Calvin Consulting Services, LLC	Construction Consulting	Las Vegas, NV	WBE
9	Communications for Design LLC	Design and Project Management Support Services	Northfield, MN	WBE
10	Convergent Technologies	Acoustics/ Audio Visual/ IT/ Low Voltage	Lockport, NY	WBE
11	Copley Wolff Design Group, Inc.	Full Landscape Architectural Services	Boston, MA	WBE
12	Desert Construction Consulting, Ltd	Estimating and Contractor Bidding Services	Henderson, NV	MBE
13	Desman, Inc.	Parking Garage Bridging Documents (LOA)	Boston, MA	MBE
14	Dietz & Company Architects, Inc.	Full Service Architecture and Interior Design	Springfield, MA	WBE
15	Engineers Design Group, Inc.	Structural Engineering Consulting Services	Malden, MA	MBE

Notes:

- (1) Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
- (2) Green highlighted companies have been paid as of May 31, 2016.
- (3) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
16	Erin Chrusciel Photography, LLC	Photography	East Longmeadow, MA	WBE
17	Fernandez & Associates	Fire Protection Design and Code Consulting Services	Byfield, MA	MBE
18	Keville Enterprises, Inc.	Construction Management and Inspection	Marshfield, MA	WBE
19	Marshall Moya Design, LLC	Architectural Services	Washington, DC	MBE
20	MCLA, Inc.	Lighting	Washington, DC	WBE
21	Nitsch Engineering, Inc.	Engineering Services	Boston, MA	WBE
22	Pari Riahi Architects, Inc.	Executive Architect	Amherst, MA	WBE
23	Renderready, LLC	Rendering and Graphic Design	Henderson, NV	MBE
24	Soden Sustainability Consulting, LLC	LEED	Winchester, MA	WBE
25	Spec's Design Group, LLC	Interior Design	Springfield, MA	WBE
26	Stevens & Associates	Façade Stabilization Design	Brattleboro, VT	VBE
27	Timothy Haahs & Associates, Inc.	Architect and Engineer of Record/ Parking Consultant	Blue Bell, PA	MBE
28	VAV International, Inc.	Mechanical Consulting	Woburn, MA	MBE
29	WA Architects, Inc.	Architectural Services	Cleveland, OH	MBE

Notes:

- (1) Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
- (2) Green highlighted companies have been paid as of May 31, 2016.
- (3) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

CONSTRUCTION COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	13.4%	26	\$21.67M
MBE	5.0%	5.7%	11	\$9.19M
VBE ⁽³⁾	2.0%	7.2%	8	\$11.60M

Notes:

- (1) Total Commitments through June 30, 2016 are \$161.9M.
 - (2) Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
 - (3) Connecticut Temperature controls VBE diversity is not currently being counted pending a review by the Massachusetts Gaming Commission.
 - (4) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.
- WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
1	All American Signs	Signage	Plymouth, MA	VBE
2	American Environmental, Inc.	Abatement	Holyoke, MA	MBE
3	Arrow Security Corporation	Security Guard Services	Springfield, MA	VBE
4	Ayala Excavating and Trucking, LLC	Trucking	Springfield, MA	MBE
5	BECO Electrical Contractors, Inc.	Electrical	Monson, MA	VBE
6	Berkshire Concrete Cutting, LLC	Saw Cutting	Torrington, CT	WBE
7	C&C Contractors, LLC	Trucking Services	Springfield, MA	MBE
8	C&D Electronics, Inc.	Cabling, Wiring, Electronics Supplier	Holyoke, MA	WBE
9	CK Flooring Solutions, Inc.	Carpet Installer	Chicopee, MA	WBE
10	CMJ, LLC	Property Management/Maintenance	Springfield, MA	MBE
11	Connecticut Drywall Finishing, Inc.	Drywall	West Springfield, MA	WBE
12	Connecticut Temperature Controls, LLC	Controls	Newington, CT	VBE
13	Coghlin Electrical Contractors, Inc.	Electrical Services	Worcester, MA	WBE
14	EDM Construction, Inc.	Carpentry & Structural Steel Erection	Merrimac, MA	WBE
15	E L Waterman, Inc.	Pipe Supplier	Foxboro, MA	WBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

(2) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
16	Evermore Light & Power, Inc.	Electrical	Somerville, MA	WBE
17	Fabiano Oil Corp.	Fuel & Oil Supplier	Wrentham, MA	WBE
18	Federal Concrete, Inc.	Concrete Services	Hopedale, MA	WBE
19	Fletcher Sewer & Drain, Inc.	Inspection - FEIR	Ludlow, MA	WBE
20	Folan Waterproofing and Construction Company, Inc.	Masonry Contractors & Waterproofing	South Easton, MA	WBE
21	Frisoli Electric, Inc.	Electrical	Holbrook, MA	VBE
22	Gomes Construction Co. Inc.	Utility Connections	Ludlow, MA	WBE
23	Granite City Electric Supply Company, Inc.	Electrical Supplier	Quincy, MA	WBE
24	H B Welding, Inc.	Steel, Welding, Iron Work	Johnston, RI	WBE
25	JRL Construction, Inc.	General Contractor - Demolition	Springfield, MA	VBE
26	Kittredge Equipment Company, Inc.	Kitchen Equipment	Agawam, MA	WBE
27	L.K. Sheet Metal, Inc.	Sheet Metal	East Hartford, CT	WBE
28	Larry's Trucking Co.	Trucking	Springfield, MA	MBE
29	Lindon Group	Piping Materials	East Providence, RI	WBE
30	Medeiros Hydroseeding & Landscaping Construction, Inc.	Trucking and Soil Materials	Monson, MA	MBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

(2) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
31	New England Foundation Company, Inc.	Helical Piles	Andover, MA	WBE
32	Northeastern Steel Corporation	Steel Distributor	Revere, MA	MBE
33	Optimum Building & Inspection, Inc.	Carpentry	Springfield, MA	MBE
34	Performance Testing & Balancing LLC	Testing & Balancing	South Hampton, MA	VBE
35	Rebars & Mesh, Inc.	Concrete	Haverhill, MA	WBE
36	Regis Steel Corporation	Steel Erection/ Reinforcing	Fall River, MA	MBE
37	S&F Concrete Contractors, Inc.	Concrete	Hudson, MA	MBE
38	Security Construction Services, Inc.	Fencing	Hudson, MA	WBE
39	Steere Engineering, Inc.	Engineering Services	Warwick, RI	WBE
40	Strategic Environmental Services, Inc.	Environmental Consultants	Sutton, MA	WBE
41	T & M Equipment Corporation	Excavating Contractor	Springfield, MA	VBE
42	Titan Roofing Company	Roofing	Springfield, MA	MBE
43	Triton Leasing and Rental, Inc.	Demolition & Abatement	Feeding Hills, MA	WBE
44	Ultimate Abatement Company, Inc.	Abatement	Plainfield, MA	WBE
45	Willow Tree Outdoor, LLC	Landscape	Springfield, MA	WBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

(2) Reference Quarter 2 2016 Status Report Section 2b and Appendix B.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

WORKFORCE DIVERSITY STATISTICS - TOTAL

AS OF JUNE 29, 2016

Group	Project Goals	Project To Date %
Women	6.90%	9.87%
Minority	15.30%	29.45%
Veteran	8.00%	9.38%

Notes:

- (1) Statistics include all workforce reports that were received by MGM as of June 29, 2016.
- (2) The Diversity plan approved by the MGC allows reporting to include hours allocated to multiple diversity categories. 5.51% of total workforce hours are included in two of the diversity categories. There are currently 152 out of 205,246.25 hours that are reported within three diversity categories, or 0.07%.
- (3) Reference Quarter 2 2016 Status Report Section 2c and Appendix B and C.
- (4) While this is not a reporting requirement of the approved diversity plan, the total hours worked through 2nd Quarter 2016 is as follows:
 - Approximately 35% are from Springfield/ Surrounding Communities
 - Approximately 56% are from Western Massachusetts
 - Approximately 82% are from Massachusetts

CURRENT QUARTER SITE PROGRESS



Hotel Foundation - August 13, 2016



Hotel Foundation - August 13, 2016



Podium Foundation & 73 State Demo - August 16, 2016

CURRENT QUARTER SITE PROGRESS



Hotel Foundation - August 17, 2016



Hotel Foundation - August 17, 2016



Union Chandler Facade Stabilization - August 22, 2016

CURRENT QUARTER SITE PROGRESS



Garage Crane - September 14, 2016



Garage Precast Panels - September 14, 2016



Union Chandler Rear Portion Demolition - September 14, 2016

Mike Mathis

President & COO - MGM Springfield





MGM SPRINGFIELD

QUARTERLY STATUS REPORT #5

Monitoring of Project Construction and
Licensee Requirements
205 CMR 135

For the Period:
April–June 2016



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

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QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.2 The commission shall, in accordance with M.G.L. c. 23K, §§ 10 and 11 approve for each gaming licensee, a project schedule for the gaming licensee's capital investment in its gaming establishment and related infrastructure which includes:

(a) all major stages of design and construction; including all permitting and approvals, design deliverables, site preparation, foundation, structure, plumbing, electrical, mechanical, exterior finish and fenestration, long lead items, insulation, interior finish and furnishings and landscaping, building commissioning and commissioning of gaming equipment and information technology systems.

(b) For a Category 1 gaming establishment, a timeline for commencement of the final stage of construction pursuant to M.G.L. c. 23K, § 10(a); and

(c) a timeline for the stage of construction at which the gaming licensee shall be approved to open for business or operate a slot machine pursuant to M.G.L. c. 23K, §§10(c) and 11(a).

135.02.4 If unforeseen and/or changed circumstances necessitate a change to a project schedule approved pursuant to 205 CMR 135.02(2) which will impact the completion date or requires a major change in the method or progress of construction, the gaming licensee may submit to the commission for its approval a revised project schedule, with a detailed statement of the unforeseen changed circumstances which justify the revised project schedule. If the commission approves such revised project schedule, it shall substitute and supersede the previously approved project schedule.

1 PROJECT SCHEDULE

1a CURRENT SCHEDULE

On August 6, 2015, the Massachusetts Gaming Commission approved a revised opening date of thirty (30) days following a construction completion date of either August 6, 2018 or the date on which the I-91 Viaduct Project achieves Full and Beneficial Use (as defined in MassDOT project documents), whichever occurs later. MGM submitted a final project schedule for consideration on November 6, 2015. In accordance with our commitment to providing monthly schedule updates, schedule updates were provided to MGC's representative on May 4, May 29, and July 3 of this year. The July 3rd update is included in this document as [Appendix A](#).

1b PROJECT SCHEDULE CHANGES

There are no changes to report that would alter MGM's opening date.

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.3 Within the time frame provided in the award of the gaming license, the licensee shall provide to the commission for commission approval an affirmative action program of equal opportunity whereby the licensee establishes specific goals for the utilization of minorities, women and veterans on construction jobs and for contracting with minority, women or veteran owned businesses during either design or construction; provided, however that such goals shall be equal to or greater than the goals contained in Executive Office of Administration and Finance Administrative Bulletin Number 14.

135.02.5c To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(e) a detailed statistical report pursuant to M.G.L. c. 23K, §21(a)(23) on the number, gender and race, and veteran status of individuals by job classifications hired to perform labor as part of the construction of the gaming establishment and related infrastructure, and a comparison of this report with the goals established by the gaming licensee and commission pursuant to M.G.L. c. 23K, §21(a)(22).). In the event the licensee’s hiring of the aforementioned entities does not comply with the goals established the licensee shall submit within 20 days of a request by the commission a response as to why the goals have not been achieved, identify any good faith efforts that have been undertaken to achieve those goals and provide a plan to bring the dollar amount contracted and spent into compliance with the goals.

(f) a report describing the number of contracts, total dollar amounts contracted with and actually paid to minority business enterprises, women business enterprises and veteran business enterprises for design and construction of the gaming establishment and related infrastructure, and the total number and value of all subcontracts awarded to a minority, women and veteran owned business, and a comparison of these reports with the goals established by the gaming licensee and commission pursuant to M.G.L. c. 23K, §21(a)(21). In the event the licensee’s hiring of the aforementioned entities does not comply with the goals established the licensee shall submit within 20 days of a request by the commission a response as to why the goals have not been achieved, identify any good faith efforts that have been undertaken to achieve those goals and provide a plan to bring the dollar amount contracted and spent into compliance with the goals.

2 CONSTRUCTION PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY

2a DIVERSITY SUMMARY

The following is a snapshot of Construction and Design Diversity Commitments through June 30:

GROUP	PROJECT GOALS	COMMITMENTS	VARIANCE	COMPANY COUNT	VALUE
WBE	10.00%	13.2%	3.2%	40	\$25.75M
MBE	5.00%	6.6%	1.6%	24	\$12.91M
VBE	2.00%	6.4%	4.4%	10	\$12.56M

Notes:

1. Total Commitments through June 30, 2016 are \$195.2M
2. Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women’s Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

Updates on outreach activities and additional diversity reporting are presented monthly to the Access and Opportunity Committee of the Massachusetts Gaming Commission. The most recent AOC presentation for July 12, 2016 is included as [Appendix B](#).

2b COMMITMENTS

Design and Consulting Commitments

The following is a snapshot of Design and Consulting Diversity Commitments through June 30:

GROUP	PROJECT GOALS	COMMITMENTS	CONSULTANT COUNT	VALUE
Women	10.00%	12.3%	14	\$4.08M
Minority	5.00%	11.2%	13	\$3.72M
Veteran	2.00%	2.9%	2	\$0.96M

Notes:

- Total Commitments through June 30, 2016 are \$33.3M
- Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
- Value for VBE (Stevens & Associates) is included in the Construction Commitments because they are being billed through Tishman.

A listing of design and consulting companies included in the totals above is included in [Appendix B](#).

Construction Commitments

The following is a snapshot of Construction Diversity Commitments through June 30:

GROUP	PROJECT GOALS	COMMITMENTS	CONSULTANT COUNT	VALUE
Women	10.0%	13.4%	26	\$21.67M
Minority	5.0%	5.7%	11	\$9.19M
Veteran ⁽³⁾	2.0%	7.2%	8	\$11.60M

Notes:

- Total Commitments through June 30, 2016 are \$161.9M
- Includes companies that are certified with the following agencies:
 - MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
 - WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
 - VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.
- Connecticut Temperature Controls VBE Diversity is not currently being counted pending a review by the Massachusetts Gaming Commission.

A listing of construction companies included in the totals above is included in [Appendix B](#).



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

2c WORKFORCE STATISTICS

Subcontractors have been submitting workforce tracking forms after each pay period. The most recent available results have been tallied and are included as [Appendix C](#).

Summary workforce statistics for the total Project as of June 29 are as follows:

GROUP	PROJECT GOALS	PROJECT TO DATE %
Women	6.9%	9.87%
Minority	15.3%	29.45%
Veteran	8.0%	9.38%

Notes:

1. Statistics include all workforce reports that were received by MGM as of June 29, 2016.
2. The Diversity plan approved by the MGC allows reporting to include hours allocated to multiple diversity categories. 5.51% of total workforce hours are included in two of the diversity categories. There are currently 152 out of 205,246.25 hours that are reported within three diversity categories, or 0.07%.
3. While this is not a reporting requirement of the approved diversity plan, the total hours worked to date break down as follows:
 - Approximately 35% are from Springfield/Surrounding Communities
 - Approximately 56% are from Western Massachusetts
 - Approximately 82% are from Massachusetts

Additional workforce statistics and reporting is included in [Appendix B](#).



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.5a To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(a) the total estimated cost of construction of the project and related infrastructure improvements, including a sworn certification regarding costs incurred pursuant to 205 CMR 122.03: Costs Included in the Calculation of Capital Investment, and separately identifying detailed costs for design, land acquisition, site preparation and construction and off-site improvements

(b) a sworn certification regarding the capitalization of the gaming licensee, sufficient for the commission to determine, pursuant to M.G.L. c. 23K §10(e) or 11(c), that the gaming licensee has adequate funds to complete the gaming establishment and related infrastructure improvements.

3 COST OF CONSTRUCTION / CAPITALIZATION OF GAMING LICENSEE

Pursuant to 205 CMR 135.02.5(a) and (b), please see [Appendix D](#) for a certification regarding (a) the total estimated cost of construction of the project and related infrastructure improvements, and (b) the capitalization of MGM Springfield.



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.5c To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(c) a copy of all design and construction contracts executed within the prior quarter by the gaming licensee to design and construct the gaming establishment and related infrastructure improvements

4 DESIGN & CONSTRUCTION CONTRACTS

The following contracts were executed in the second quarter of 2016:

COMPANY	CONTRACT	MGC STATUS
1. Friedmutter Group	Architect of Record Agreement	REGISTRANT
2. Tishman Construction Corporation	Design Build Contractor Agreement	REGISTRANT
3. Fenagh Engineering and Testing	3 rd Party Testing and Inspection for the Parking Garage	REGISTRANT
4. NAI Plotkin	Design and Construction Coordination and Supervision Services	REGISTRANT
5. Hayward Baker / G. Donaldson	Tishman Letter of Agreement for Podium Deep Foundations	Subcontractor to Tishman
6. Berlin Steel	Tishman Letter of Agreement for Podium and Hotel Structural Steel and Precast Plank	Subcontractor to Tishman
7. S&F Concrete	Tishman Letter of Agreement for Cast in Place Concrete	Subcontractor to Tishman
8. Schindler Elevators	Tishman Letter of Agreement for Podium and Hotel Elevators	Subcontractor to Tishman
9. Oldcastle Precast	Tishman Letter of Agreement for Precast Plank	Subcontractor to Tishman

Copies of executed agreements are available to the Massachusetts Gaming Commission's Representative for review.



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.5d To ensure adherence to the project schedule approved pursuant to 205 CMR 135.02(2) or (4), the gaming licensee shall submit to the commission in a media, format and level of detail acceptable to the commission, quarterly a status report including:

(d) a status report reflecting the progress of construction and certifying compliance with the approved project schedule for major stages of construction. In the event that the progress of construction does not comply with the project schedule approved pursuant to 205 CMR 135.02, the licensee shall submit a detailed plan to bring the progress of construction into compliance with the approved project schedule or submit a request for a revised project schedule pursuant to 205 CMR 135.02(4)

5 STATUS OF WORK COMPLETED / PROGRESS PHOTOGRAPHS

5a STATUS OF WORK COMPLETED

The following onsite activities have taken place in the past two months.

- Parking Garage: Footings are being installed and Concrete is being poured daily. Backfilling and compaction continues around footings. The plumbing subcontractor has begun plumbing pipe at the Southeast corner of the garage. The stockpile of excavated material is being removed from the north portion of the garage site, so footings in that area can be formed & poured.
- Hotel/Podium: The façade of 73 State Street was braced for demolition and the interiors and rear portion of the building demolished. An abandoned steam line under Bliss Street was remediated and removed. The basement of the Edisonia building was backfilled. Foundation work is underway, and the first concrete footings were poured on June 24. The Union House/Chandler Hotel façade has been braced and rubble cleared from around the foundation. Test piles were installed and load tests performed on either side of the façade. Mini piles are currently being installed along Main Street.
- 95 and 101 State Street: Interior demolition of 95 State street was completed. An above ground storage tank was removed from the basement of 95 State was removed and alterations were made to the boiler room, with boiler room wall infill underway.
- Armory: The rear portion of the Armory was demolished and debris loaded out.
- French Church: A new foundation for the French Church was constructed underneath the building after it was relocated to Union Street. Foundation infill and waterproofing is underway.
- Dave's Furniture: Abatement work is underway.
- Surrounding Streets/Offsite Utilities: Isolation valves and service tie-ins were installed on Union Street. Work began on a water bypass along Main Street in mid June and is expected to continue throughout the summer. Installation of a fire hydrant on State Street took place in mid June. Temporary water and sewer services were installed along Howard Street.
- Trailers: Trailers were installed at Da Vinci Park and Tishman's field office was relocated to the site. A drug testing trailer was also installed and is in use.



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

Design Progress

The following packages were completed and provided to the City of Springfield on June 22 to fulfill obligations agreed to in the Host Community Agreement:

- Offsite 75/100% Drawing package
- 95 State Street Progress submission
- Core and Shell Progress submission
- Garage exterior signage set

A construction document progress set was prepared by the design/build team for the Parking Garage and submitted to the owner for review and coordination. Early Utilities Packages for Phases I, II and III have been undergoing revision by the Civil Engineer on a regular basis based on field conditions.

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

5b PROGRESS PHOTOGRAPHS

A set of construction site progress photographs as of June 30, 2016 is included in this document as Appendix E. The overall aerial views below show recent progress, including the demolition of the YWCA and 73 State Street and earthwork/foundation progress for the podium and parking garage.



April 22, 2016



June 26, 2016



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.6 The licensee shall have a continuing obligation, pursuant to 205 CMR 120.01(2) to timely provide to the commission an updated permits chart and all documents and information listed in 205 CMR 120.01: Permitting Requirements, as well as any updates to the MEPA process such that the commission is continuously apprised of all material developments with respect to all permits and approvals required for the gaming establishment. Pursuant to 205 CMR 120.01(1)(h) the licensee shall provide to the commission copies of any appeal within 20 days of filing, whether to a municipal or state entity or for judicial review, filed with respect to any permit of approval listed in 205 CMR 120.01(1) along with a copy of the docket sheet and each decision on any appeal.

6 PERMITS

The following is the status of required permits and approvals, including local permits issued in the months of April through June 2016:

AGENCY OR GOVERNING LEGAL AUTHORITY	PERMIT, REVIEW, OR APPLICATION	DATE APPLICATION SUBMITTED OR ESTIMATED ANTICIPATED APPLICATION DATE
FEDERAL		
1. US Environmental Protection Agency (EPA)	USEPA Construction General Permit	Permit received 2/23/15: USEPA MAR120000
	NPDES General Permit	Permit for Main St. and East Columbus Ave. received 3/9/15: MAR12B410
	NPDES Remediation General Permit (RGP)	Based on foundation design, no permit is expected to be required.
2. Federal Aviation Administration	Determination of No Hazard to Air Navigation	Approval letters received April 13, 2016: 2016-ANE-471-OE for Hotel/Casino 2016-ANE-471-OE for Parking Garage
	Form 7460-2: Notice of Actual Construction or Alteration	To be e-filed for Hotel/Casino and Parking Garage within 5 days after the construction reaches its greatest height.
STATE		
1. Massachusetts Gaming Commission	Gaming License	Received 11/7/14
	Findings issued pursuant to M.G.L. ch. 30 sec. 61	Section 61 Findings issued by MGC on December 17, 2015.
	Site Plan Approval	Final Design/Site Plan approved by unanimous vote at meeting on May 12, 2016.
2. Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act (MEPA) Review	Certificate on Final Environmental Impact Report Received 12/31/14 (EEA 15033); Certificate on Notice of Project Change (NPC) finding no Supplement Environmental Impact Report required issued on November 25, 2015.

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

3. Massachusetts Department of Environmental Protection (MA DEP)	MA DEP Underground Injection Control (UIC) BRP WS-06	To be filed at project completion
	Construction Dewatering Permit	Based on foundation design, no permit is required as groundwater can be managed internal to the site boundary. A permit will be pursued if any deeper excavation is required.
4. Massachusetts Historical Commission (MHC)	Review of project relative to potential effects of State Register historic/ archeological resources	Final Memorandum of Agreement Approved by MGC on December 17, 2015 and Signed by MHC on December 18, 2015.
5. Massachusetts Department of Transportation (MassDOT)	Findings pursuant to M.G.L c. 30, sec. 61	Section 61 Findings issued by MassDOT on March 28, 2016.
	Category III Application for Permit to Access State Highway	MGM submitted a 25% design package and Design Exception Report for MassDOT review on 2/8/16– assumed to be a Category III Application for Permit to Access State Highway. Comments on the 25% level package received 4/11/16. Comments were addressed in a 75/100% design package submitted for MassDOT’s review on 5/23/16. Upon receipt of 75/100% level comments, MGM will prepare a PS&E design package for MassDOT’s final review. MassDOT will issue the Highway Access Permit prior to construction of multimodal roadway and traffic control improvements.
6. Massachusetts Dept. of Housing & Community Development	Chapter 121A Designation as an Urban Redevelopment Project	Approval letter received 12/31/14
7. Massachusetts Department of Public Safety	Elevator Decommission Permit	Permit to decommission elevator at 83 State Street, 2/9/16: No. ELV16-0359
		Permit to decommission elevator at 1170 Main Street, 2/9/16: No. ELV16-0360
	Elevator Construction Permits	Application(s) to be filed pending final drawings
	Storage Permit	Not required per 527 CMR 9.00. No fuel tanks in excess of 10,000 gallons are expected to be included in the project.
8. Massachusetts Dept. of Fire Services-Office of State Fire Marshall	Storage Tank Removal Permit	Remove abandoned tank at 73 State Street, 6/23/16: 20160623143919
9. Massachusetts Division of Fisheries and Wildlife	Natural Heritage and Endangered Species Program	Filing exemption for Memorial Bridge improvements received on 6/21/16.

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

LOCAL PERMITS AND APPROVALS UPDATE FOR SECOND QUARTER OF 2016 (APRIL, MAY, JUNE)		
1. City of Springfield Department of Public Works – Engineering Division	Letter of Approval	Stormwater Collection System Site Improvement Plans revised through 5/24/16 and Drainage Report dated 5/22/16 prepared by Allen & Major; approval letter with no comments received 5/26/16
	Letter of Approval	Response to City regarding submitted Construction Management and Temporary Traffic Control Plans— Volume II, 5/19/16.
	Letter of Approval	Construction Management Plans titled West York Street, prepared by Allen & Major, dated 5/6/16; approval letter with no comments received 5/11/16.
	Letter of Conditional Approval, with Comments	Garage Mass Excavation: Earthwork for parking garage site demolition plans prepared by Allen & Major dated 4/13/16; conditional approval letter with comments received on 4/25/16
	Letter of Conditional Approval, with Comments	Amendment to planset titled Construction Management & Temporary Traffic Control Plans, Volume III: Hotel and Podium dated 4/4/16; conditional approval letter with comments received 4/12/16
	Letter of Approval with Comments	Earthwork Casino Podium Site Demolition Plans prepared by Allen & Major, dated March 9, 2016, approval letter with comments received 4/8/16.
	Letter of Approval	Amendment to planset titled Construction Management & Temporary Traffic Control Plans, Volume I for Phase III dated 3/31/16; approval letter with no comments received 4/6/16
	General Roadway Excavation, Trenching	Excavation, backfill, patching for temporary water main bypass; Install permanent water main on Main Street from State St. to Union Street, 6/22/16: 20161482
		Excavation, backfill, patching for 8x6 tapping sleeve and hydrant at intersection of Main St. and State Street, 6/22/16: 20160481
		Excavating, backfill and patching for temporary water, sewer and communication services on Howard Street between Main St. and E. Columbus Ave, 5/24/16: 20161105
Excavation, backfill, patching for temporary water and sewer service tie-ins for construction trailers on Howard Street between Main St. and E. Columbus Ave., 5/10/16: 20160870		
Excavation, backfill, patching for 30" RCP tie into 60x80 existing storm; 24" water main valve cut ins on Union Street between E. Columbus Ave. and Walnut		



QUARTERLY STATUS REPORT: APRIL-JUNE 2016

City of Springfield Department of Public Works – Engineering Division, continued	General Roadway Excavation, Trenching, continued	Street, 5/3/16: 20160843
		Excavating, backfill, patching for water pipe tie-ins on Howard St. between Main Street and East Columbus, 5/3/16: 20160845
	Non-Excavation Occupancy	Truck staged in roadway on State Street between W. Columbus Ave and Main Street with police detail to spray liner on inside of existing manhole, 5/24/16: 20161090
2. City of Springfield – Code Enforcement/Building Division	Certificate of Compliance	Certificate for the relocation of the French Church stating that no further inspection nor Certificate of Occupancy is required for the structure. Ties to 16BDOT-00004ER.
	Building Permit Demolition	Demolish 1-story car wash and maintenance garage building at 68-70 Union Street, 6/10/16: 15DEMO-00025
		Demolish rear portion of former Armory at 29 Howard Street, 4/28/16: 16BLDOT-00097AL
		Demolish rear portion of 1132-1142 Main Street, 4/13/16: No. 16BLDOT-00091AL
		Demolish rear of former Union Electric Building at 73 State Street, 4/8/16: 16DEMO-00027
		Demolish YWCA/former detention center at 26 Howard Street, 4/1/16: No. 16DEMO-00026
	Building Permit	Install cast in place foundation only for new casino hotel and podium, 5/6/16: 16BDOT-00033ER
		Install underground utilities under hotel and podium slab of new construction at 12 MGM Way, 5/6/16: 16BDOT-00050ER
		Install cast in place foundation only for new parking garage, 4/26/16: 16BDOT-00028ER
	Temporary Trailer	Temporary trailer for office at 19 Howard Street, 5/17/16: 16BDOT00020TMP
		Temporary trailer for kitchen at 19 Howard Street, 5/17/16: 16BDOT00017TMP
		Temporary trailer for drug testing at 94 Union Street, 5/17/16: 16BDOT00018TMP
		Temporary trailer for restrooms at 19 Howard Street, 5/17/16: 16BDOT00019TMP

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

City of Springfield – Code Enforcement/Building Division, continued	Permit To Do Gas Piping	MGM Garage two boilers at 39 MGM Way, 6/6/16: 16BDOT-00578GA Basement: Temporary relocation of boiler at 95 State Street, 5/6/16: 16BDOT-00472GA
	Permit To Do Electrical Wiring	Parking Garage-Install underground empty duct bank system/furnish/install fire alarm system/ provide empty conduits for sound/security at 34 MGM Way, 5/6/16: 16BDOT-00935EL
	Permit To Do Plumbing	Plumbing for Temporary Trailer, 6/21/16: 16BDOT-00376PL
3. City of Springfield Historical Commission	MHC Review Concurring Party; Demolition Delay	SHC approved changes to design for purposes of historic resources and revised MOU on October 23, 2015.
4. Springfield City Council	Overlay District Special Permit	Overlay District Special Permit approved by City Council on December 22, 2015.
	Site Plan Review	MGM Site Plan submission deemed completed on November 23, 2015. The City Council voted to approve the plan on 2/22/16.
	Amendments to HCA	Amendment No. 1 approved by Council vote on 6/22/15. Amendment No. 2 approved by Council vote on 2/22/16.
	Public Way Discontinuance Approval	The City Council voted to approve street discontinuances of both Bliss and Howard Streets on 1/26/16.
5. City of Springfield Department of Health and Human Services	Food Service Establishment Permit	TBD as venues are finalized
6. City of Springfield – Forestry Division	Municipal Tree Work Permit	Remove a 4" Pear and a 4" Hornbeam tree at 1176 Main and 1357 E. Columbus, 6/8/16
7. Springfield Water and Sewer Commission	New Sewer Work	Requesting a cured in place liner for the first 122-feet of sewer in Howard Street East instead of full replacement, Approval letter dated 6/27/16
	Permanent Water Connection /Service	Permanent water utilities connection, 1008-1028 Main Street, Approval memo dated 6/9/16
		Permanent water utilities connection, 84-92 Union Street, Approval memo dated 6/9/16
		Permanent water utilities connection, 34 MGM Way, Approval memo dated 6/9/16

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

Springfield Water and Sewer Commission, continued	Permanent Water Connection /Service, continued	Permanent water utilities connection, 1150 Main Street, Approval memo dated 6/7/16
	Permanent Site Drainage Connection	Permanent Site Drainage Connection at 100 Union Street, Approval memo dated 5/26/16
	Temporary Services	Services at temporary trailer, 94 Union Street, Approval memo dated 6/8/16
		Services at temporary trailer, 19 Howard Street, Approval memo dated 5/27/16
		Services at temporary trailer, 70 Howard Street, Approval memo dated 5/26/16
		Services at temporary trailer, 20 Howard Street, Approval memo dated 5/26/16
Industrial Pretreatment Program Wastewater Survey for Nonresidential Establishments	Wastewater Survey required for Sewer Connection Permit at Garage, Application filed 5/12/16	
8. City of Springfield – Fire Prevention Bureau	Installation of Above Ground Storage Tank Permit(s)	To be filed at installation of emergency generators and fire pump.
	Fuel Oil, Gasoline and Diesel Fuel Storage Permit	To be filed prior to occupancy of the Parking Garage.
9. City of Springfield – Conservation Commission	Wetlands Protection Act Filing Exemption	Filing exemption for Memorial Bridge improvements received on 5/6/16.

QUARTERLY STATUS REPORT: APRIL-JUNE 2016

135.02.7 In furtherance of specific goals for the utilization of minorities, women and veterans on construction jobs, the licensee shall send and provide a copy to the commission, to each labor union or representative of workers with which the licensee has a collective bargaining agreement or other contract of understanding, a notice advising the labor union or workers representative of the licensee's commitments pursuant to M.G.L. c. 23K §(15) and §§21(a)(21) and (22).

7 ORGANIZED LABOR LETTER

The Project Labor Agreement (PLA) was executed on February 26, 2015. Article XVIII on Page 25 of the Agreement states the construction manager and labor unions' commitment to comply with Owner's Diversity and Affirmative Marketing Program as adopted on January 22, 2015.

A copy of the executed PLA is available to the Massachusetts Gaming Commission's Representative for review.

135.02.8 Prior to the gaming establishment opening for business, in furtherance of specific goals for the utilization of minority business enterprises, women business enterprises and veteran business enterprises as vendors in the provision of goods and services to the gaming establishment, the licensee shall provide to the commission an affirmative marketing plan in which the licensee identifies specific goals, expressed as an overall program goal applicable to the total dollar value of contracts entered into, for the utilization of minority business enterprises, women business enterprises and veteran business enterprises to participate as vendors in the provision of goods and services procured by the gaming establishment and any businesses operated as part of the gaming establishment; provided, however, that the specific goals for the utilization of such minority business enterprises, women business enterprises and veteran business enterprises shall be based on the availability of such minority business enterprises, women business enterprises and veteran business enterprises engaged in the type of work to be contracted by the gaming licensee.

8 OPERATIONAL PHASE DIVERSITY PROGRAM FOR EQUAL OPPORTUNITY

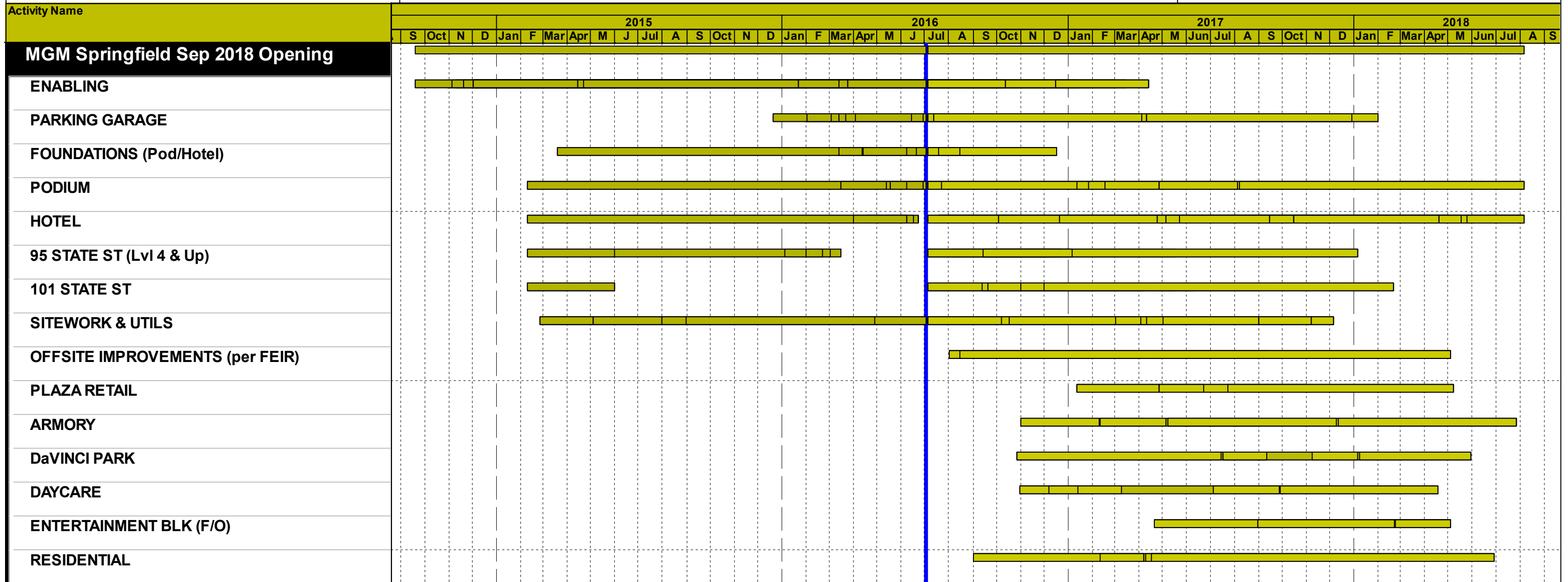
MGM's Diversity and Affirmative Marketing Program was approved on January 22, 2015. MGM will comply with this program to meet goals for Diversity participation in the operational phase of the project.

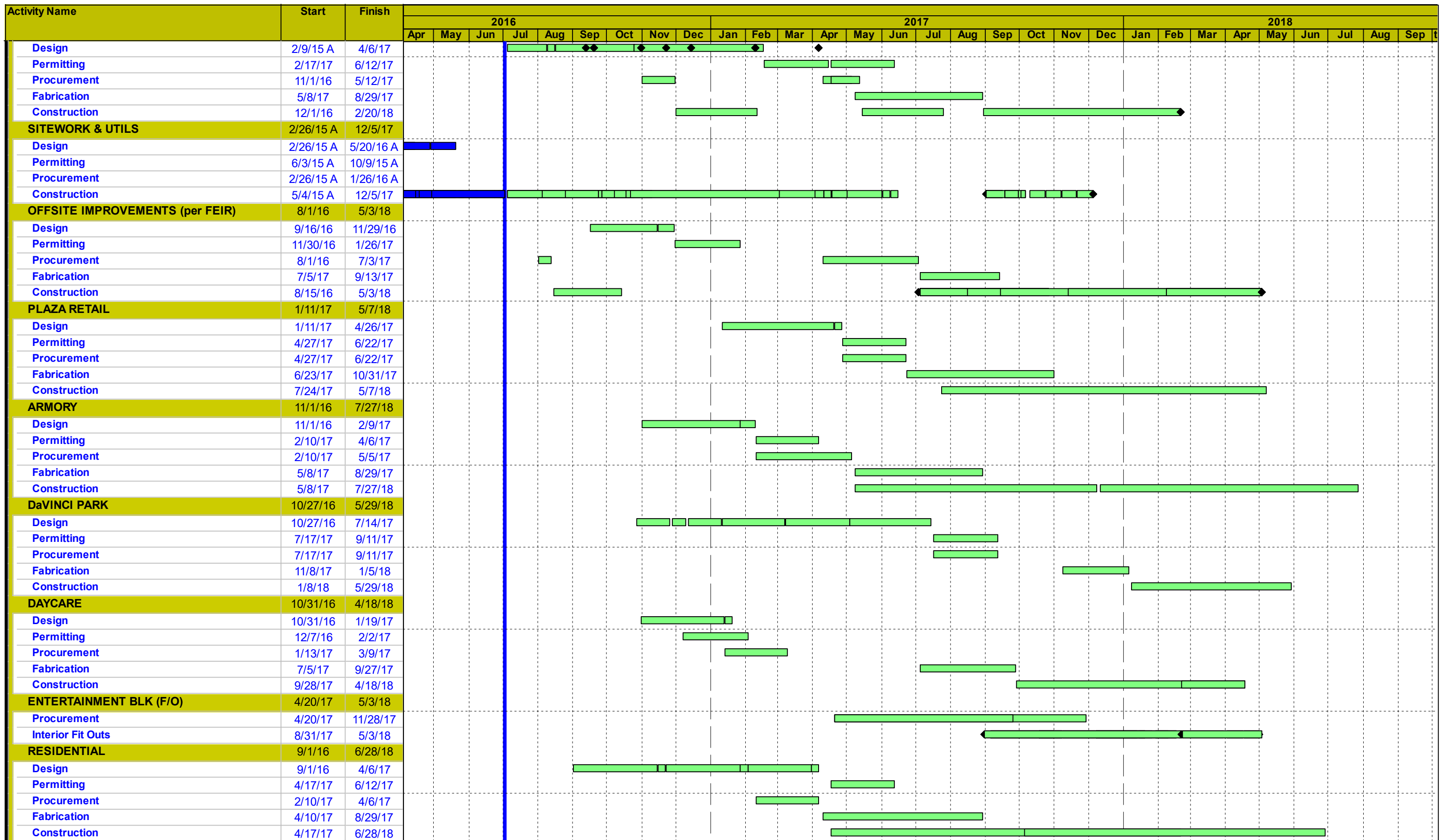
APPENDIX A




LEVEL 1, LEVEL 2 AND DETAILED PROJECT SCHEDULES

DATA DATE JULY 3, 2016

MGM Springfield Project Schedule





 Actual Work
 Remaining Work
 Critical Remaining Work



Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018																																																																																																							
					N				D				J				F				M				A				M				J				Jul				A				S				O				N				D				J				F				M				A				M				J				Jul				A				S				O				N				D				J				F				M				A				M				J				Jul				A				S			
					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D																																																																														
MGM Springfield Sep 2018 Opening					928	9/19/14 A	9/5/18																																																																																																																																									
PROJECT MANAGEMENT					928	11/4/14 A	9/5/18																																																																																																																																									
PM-100	Referendum Vote / Project Start	0	11/4/14 A																																																																																																																																													
PM-200	Tishman Const Co Released	0	11/5/14 A																																																																																																																																													
PM-999	Construction Completion (TCO): Aug 06, 2018	0		8/6/18*																																																																																																																																												
PM-990	Operations Commencement: Sept 5, 2018	0		9/5/18*																																																																																																																																												
Assist MGM with development of Project Criteria					57	1/2/15 A	8/31/16																																																																																																																																									
PM-910	Budget review	22	1/2/15 A	8/31/16																																																																																																																																												
PM-918	Parking Garage Concept Design	0		1/12/15 A																																																																																																																																												
PM-922	Enabling Design – (March)	30	2/4/15 A	5/29/15 A																																																																																																																																												
PM-926	Begin SD	0	3/18/15 A																																																																																																																																													
PM-920	Kickoff Meeting	0	3/18/15 A																																																																																																																																													
Negotiate and Finalize Project Labor Agreement					39	1/7/15 A	2/26/15 A																																																																																																																																									
PM-916	Negotiate and Finalize Project Labor Agreement	39	1/7/15 A	2/26/15 A																																																																																																																																												
Mass Gaming Commission					866	11/4/14 A	9/5/18																																																																																																																																									
1 Statute-Chap 23K					235	11/4/14 A	2/18/16 A																																																																																																																																									
MGC-653	Own land within 60 days of license issuance	0		11/4/14 A																																																																																																																																												
MGC-070	Prep & Submit: expected vehicle traffic generated by the site, and plans for	10	12/22/14	12/31/14																																																																																																																																												
MGC-063	Prep & Submit: PLA. MGM to show plans for insuring labor harmony during	10	2/16/15 A	2/26/15 A																																																																																																																																												
MGC-651	provide a community impact fee to the host community;	0		8/1/15 A																																																																																																																																												
MGC-652	Prep& Submit: Licensees required to (15) provide commission aggr demo;	10	8/1/15 A	8/1/15 A																																																																																																																																												
MGC-650	Have a certified and binding vote by the host community in favor of the lice	0		8/1/15 A																																																																																																																																												
MGC-067	Prep & Submit: names and addresses of the architects, engineers and des	5	2/15/16 A	2/18/16 A																																																																																																																																												
2 Licensing Agreement					40	3/15/18	5/10/18																																																																																																																																									
MGC-655	Prep& Submit: create plan to identify potential local vendor in ninety (90) d	10	3/15/18	3/28/18																																																																																																																																												
MGC-656	Rev& Approv: create plan to identify potential local vendor in ninety (90) d;	10	4/27/18	5/10/18																																																																																																																																												
3 205 CMR					866	2/17/15 A	9/5/18																																																																																																																																									
MGC-136	Prep & Submit: Affirmative Action Plan	1	2/17/15 A	2/27/15 A																																																																																																																																												
MGC-182b	MGC to Participate in Design	0	3/18/15 A	10/26/16																																																																																																																																												
MGC-149	Submit Schematic Designs (Site Plan)	0		2/22/16 A																																																																																																																																												
MGC-659	Prep& Submit: The commission may request or have access to, at any time	0		9/27/16																																																																																																																																												
MGC-171	MGC Requested Review - Access; eg doors, locking systems, sally port (fr	0		9/28/16																																																																																																																																												
MGC-172	MGC Requested Review - Location of staff entrance	0		9/28/16																																																																																																																																												
MGC-173	MGC Requested Review - Location of security office	0		9/28/16																																																																																																																																												
MGC-174	MGC Requested Review - Number, nature and type of conx pts between g:	0		9/28/16																																																																																																																																												
MGC-175	MGC Requested Review - Surveillance coverage (location and types of ca	0		9/28/16																																																																																																																																												
MGC-176	MGC Requested Review - Surveillance monitoring (eg location of surv rm,	0		9/28/16																																																																																																																																												
MGC-177	MGC Requested Review-Count rm layout & design (eg size, reinf walls, we	0		9/28/16																																																																																																																																												
MGC-178	MGC Requested Review - Cage layout (eg mantrap, reinforced walls, wind	0		9/28/16																																																																																																																																												
MGC-179	MGC Requested Review - Slot floor layout (eg placement of machines, sei	0		9/28/16																																																																																																																																												
MGC-180	MGC Requested Review - Access to gaming floor (eg adequacy of security	0		9/28/16																																																																																																																																												
MGC-181	MGC Requested Review - Regulator office space (eg size, location, IT Rec	0		9/28/16																																																																																																																																												
MGC-182	MGC Requested Review - Policing agency space (eg office size, interview	0		9/28/16																																																																																																																																												
MGC-183	MGC Requested Review - Responsible gaming space (eg size, access an	0		9/28/16																																																																																																																																												
MGC-184	MGC Requested Review - Sensitive areas (eg definition (cage, count room	0		9/28/16																																																																																																																																												
MGC-185	MGC Requested Review - Building system specs	0		9/28/16																																																																																																																																												
MGC-186	MGC Requested Review - i. back-up generator	0		9/28/16																																																																																																																																												
MGC-187	MGC Requested Review - ii. Independent power sources	0		9/28/16																																																																																																																																												
MGC-188	MGC Requested Review - iii. Redundancy	0		9/28/16																																																																																																																																												
MGC-189	MGC Requested Review - iv. Emergency lighting	0		9/28/16																																																																																																																																												

■ Remaining Level of Effort ■ Remaining ...
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■ Actual Work ◆ Milestone

MGM Springfield Sep 2018 Opening Detailed Schedule

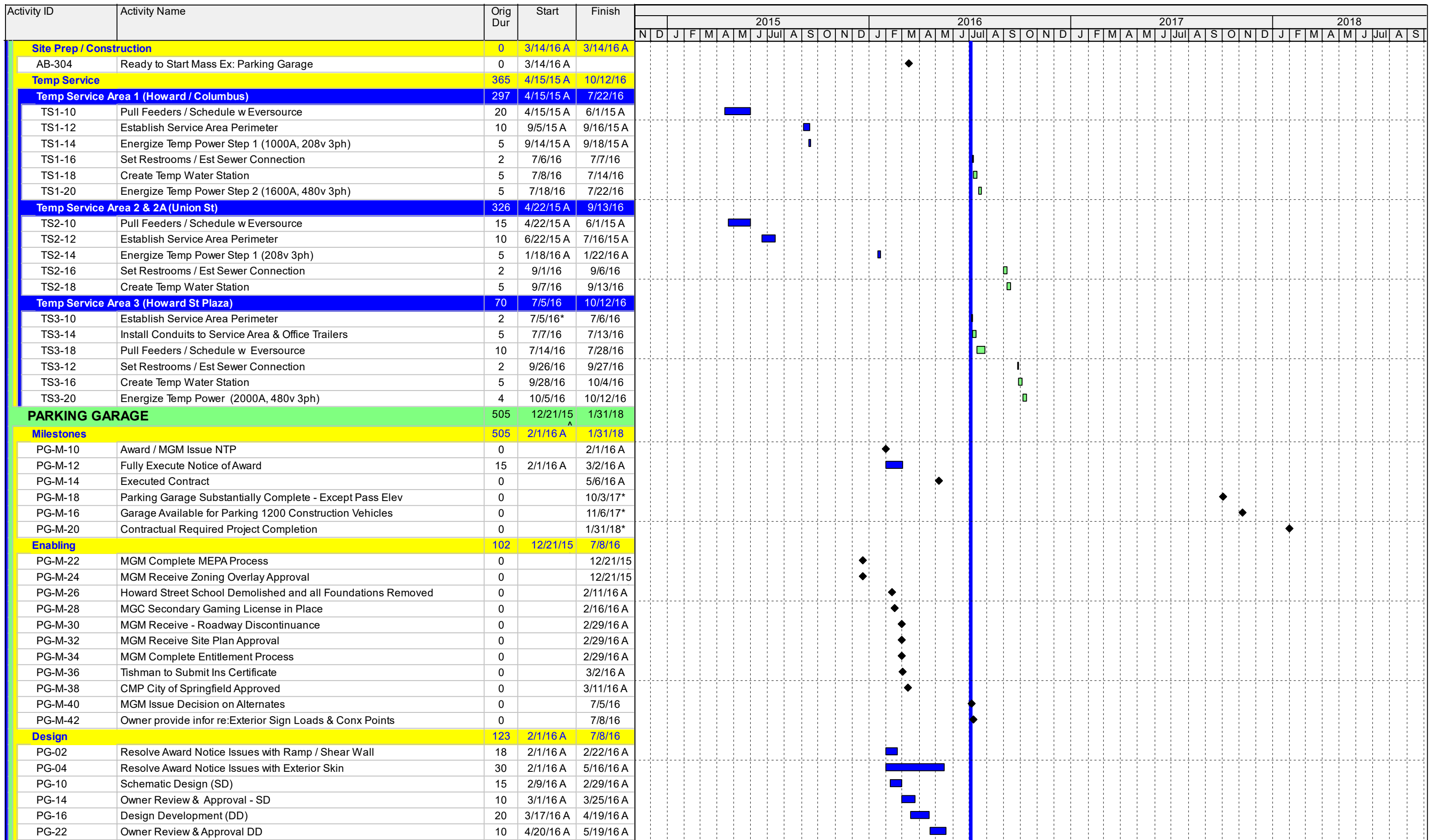


Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018											
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ENT-278	Submission	30	4/5/16 A	5/15/16 A																																																
ENT-279	Review by City	30	5/16/16 A	6/20/16 A																																																
ENT-280	Approval	0		6/20/16 A																																																
De-Watering		359	5/4/15 A	10/3/16																																																
ENT-275	De-Water - Submission (As Needed)	20	5/4/15 A	8/5/16																																																
ENT-276	De-Water- Review	40	8/8/16	10/3/16																																																
ENT-277	De-Water- Approval	0		10/3/16																																																
Engagement and Coordination Activities		25	2/4/15 A	4/22/15 A																																																
Coordination with City of Springfield		0	2/25/15 A	2/25/15 A																																																
ENT-184	Liaison - Kickoff Mtg	0	2/25/15 A																																																	
Secure Initial Demo & Bldg Permits (w MGM)		25	2/4/15 A	4/22/15 A																																																
ENT-178	Secure initial demolition & building permits	25	2/4/15 A	4/22/15 A																																																
Building Permits		346	2/18/15 A	7/25/16																																																
ENT-142	Site Perimeter Fence Plan	13	2/18/15 A	3/16/15 A																																																
ENT-154	Mass. Dig Safe Utility Mark Out Plan	10	3/17/15 A	3/30/15 A																																																
ENT-144	Secure Site	120	3/17/15 A	4/30/15 A																																																
ENT-129	Parcels 25a,b, 1c, 1d, Non-Historic	20	4/27/15 A	5/19/15 A																																																
ENT-128	Parcels: 10a, 11a,b,c,d, 12, 13a,b,c, 15 - Demolition Non-Historic	20	4/27/15 A	5/19/15 A																																																
ENT-140	Temporary Project Water, Electrical, Lighting Plan	30	5/4/15 A	6/15/15 A																																																
ENT-188	Establish Service Areas Plan	0	6/5/15 A																																																	
ENT-218	Relocate: French Congregational Church Bldg Moving Permit	15	1/4/16 A	1/22/16 A																																																
ENT-126	Howard St. School (Zanetti) - Permit to Demo	3	1/4/16 A	1/6/16 A																																																
ENT-200	Demo Permit: Office Building (79 State)	14	2/1/16 A	2/10/16 A																																																
ENT-198	Retain Façade: United Electric Building (73 State) Stabil & Demo Permit	24	2/29/16 A	4/8/16 A																																																
ENT-222	Partial reuse: State Armory Bldg. Stabil & Demo	73	2/29/16 A	4/15/16 A																																																
ENT-240	Initial Mass Excavation Permit	19	3/7/16 A	3/16/16 A																																																
ENT-202	Interior Demo: Office Building (95 State)	10	3/14/16 A	3/25/16 A																																																
ENT-214	Demolition: Edisonia Theatre Block	5	3/15/16 A	3/25/16 A																																																
ENT-220	Demolition: YWCA/ Corrections (22-30 Howard)	5	3/15/16 A	4/1/16 A																																																
ENT-216	Retain Façade (portions): Union House/ Chandler House Stabil & Demo	20	3/23/16 A	7/25/16																																																
Procurement		351	12/8/14 A	12/30/16																																																
MWVBE, Local Contractor Outreach		351	12/8/14 A	12/30/16																																																
PRO-102	MWVBE, Local Contractor Outreach	160	12/8/14 A	12/30/16																																																
PRO-112	Pre-Qual	160	12/8/14 A	12/30/16																																																
PRO-114	Development and MGC Acceptance of MGM Diversity Participation Plan	160	12/8/14 A	3/31/15 A																																																
PRO-116	Expression of Interest - Enabling	0		2/6/15 A																																																
PRO-166	Expression of Interest - Core & Shell	0		3/5/15 A																																																
PRO-182	Expression of Interest - Fitout	0		7/18/16																																																
Early Works Packages		292	2/16/15 A	5/20/16 A																																																
PRO-105	Abate/Demo Pkg 1 Zanetti (Incl Clear & Grub) (Prequal-Procure)	20	2/16/15 A	3/11/15 A																																																
PRO-104	Site Fence, Guard Shacks, Construction Trailers	20	2/25/15 A	4/9/15 A																																																
PRO-106	Probe program	20	2/25/15 A	4/10/15 A																																																
PRO-109	Abate/Demo Pkg 3 Union-Ch/ 73ST/ 79 ST/ Fr Church (Prequal-Procure)	20	3/17/15 A	6/5/15 A																																																
PRO-107	Abate/Demo Pkg 2 68 Union / 53 Howard/ Armory / (Prequal-Procure)	30	4/1/15 A	4/24/15 A																																																
PRO-111	Abate/Demo Pkg 5 Robbies/ 82 Howrd/ Parc 1C/ Edisonia/ 1126 Main/ 112	20	4/1/15 A	5/8/15 A																																																
PRO-108	Relocation of French Congregational Church	20	4/27/15 A	6/5/15 A																																																
PRO-115	Abate/Demo Pkg 7 YWCA (Prequal-Procure)	20	6/3/15 A	6/30/15 A																																																
PRO-113	Abate/Demo Pkg 6 Mission (Prequal-Procure)	20	12/7/15 A	12/31/15																																																
PRO-110	Abate/Demo Pkg 4 95 ST (Prequal-Procure)	10	1/4/16 A	1/15/16 A																																																
PRO-183	Buy: Union/Chandler Stabilization of existing structures	20	2/3/16 A	5/20/16 A																																																

■ Remaining Level of Effort ■ Remaining ...
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MGM Springfield Sep 2018 Opening Detailed Schedule





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MGM Springfield Sep 2018 Opening Detailed Schedule



Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018											
					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	
PG-716	Install Ductless Split Units Elec Rms	30	7/11/17	8/21/17																																																
PG-642	Install Glycol System at Roof Ramp	10	7/24/17	8/4/17																																																
PG-714	Install Quad #3 & #4 Supply / Exhaust Fans	20	7/24/17	8/18/17																																																
PG-720	Install Ductless Split Units IDF Rms	30	8/22/17	10/3/17																																																
Fire Protection		124	1/24/17	7/25/17																																																
PG-624	Install fire Protection Stand Pipes Stair #3	15	1/24/17	2/14/17																																																
PG-672	Install fire Protection Stand Pipes Stair #2	15	2/15/17	3/8/17																																																
PG-674	Install fire Protection Stand Pipes Stair #4	15	3/9/17	3/29/17																																																
PG-676	Install fire Protection Stand Pipes Stair #1	12	6/7/17	6/22/17																																																
PG-678	Install fire Protection Stand Pipes Stair #5	12	6/23/17	7/11/17																																																
PG-646	Test Standpipe System	10	7/12/17	7/25/17																																																
Misc Metals		184	11/29/16	8/18/17																																																
PG-650	Install Stair 3 Guard Rails	10	11/29/16	12/12/16																																																
PG-648	Install Stair 2 Guard Rails	10	12/13/16	12/27/16																																																
PG-652	Install Stair 4 Guard Rails	10	3/30/17	4/13/17																																																
PG-656	Install Guard Rail at Top of Spandrels	40	6/9/17	8/4/17																																																
PG-638	Install Stair 1 Guard Rails	10	6/19/17	6/30/17																																																
PG-654	Install Stair 5 Guard Rails	10	7/24/17	8/4/17																																																
PG-658	Install Pipe Protection Guards	20	7/24/17	8/18/17																																																
Elevators		371	7/12/16	12/29/17																																																
Freight		245	7/12/16	6/29/17																																																
PG-304	Install Freight elevator Piston Casing	3	7/12/16	7/14/16																																																
PG-660	Construct Elev Shafts for Frieght Elev - Stops Basement, L 1 and Mezz Lev	10	3/8/17	3/21/17																																																
PG-662	Construct Freight Elevator Machine Rooms	10	3/22/17	4/4/17																																																
PG-664	Install Service Elevator No. 1	30	4/5/17	5/17/17																																																
PG-670	Install Ductless SplitAC Unit at Elevator Machine Rooms	10	4/5/17	4/19/17																																																
PG-666	Install Service Elevator No. 2	30	5/18/17	6/29/17																																																
Employee Elevators Cars 1 & 2		126	4/5/17	10/3/17																																																
PG-EE1-02	Delivery & Unload Elev No.1 & 2	3	4/5/17	4/10/17																																																
PG-EE1-04	Stage Hoistway	5	4/11/17	4/17/17																																																
PG-EE1-06	Install Brackets/Rails	10	4/18/17	5/1/17																																																
PG-EE1-08	Set Machine Beams/Machines/OH Eqpt	10	5/2/17	5/15/17																																																
PG-EE1-10	Set Control Room Eqpt	5	5/16/17	5/22/17																																																
PG-EE1-12	Build Car Sling	8	5/23/17	6/2/17																																																
PG-EE1-14	Install Elevator Fronts	15	6/5/17	6/23/17																																																
PG-EE1-16	Install Elevator Fixtures	8	6/26/17	7/6/17																																																
PG-EE1-18	Install Elevator Doors	22	7/7/17	8/7/17																																																
PG-EE1-20	Pipe & Wire Hoistway	8	8/4/17	8/15/17																																																
PG-EE1-22	Work by Others - Pit Ladder, Lights, Disconnects	3	8/16/17	8/18/17																																																
PG-EE1-24	Build Elevator Cab	8	8/21/17	8/30/17																																																
PG-EE1-26	Pipe & Wire Cab	5	8/31/17	9/7/17																																																
PG-EE1-28	Hang Car Doors	5	9/8/17	9/14/17																																																
PG-EE1-30	Elevator Flooring by Others	3	9/15/17	9/19/17																																																
PG-EE1-32	Adjust/Test/Commission Elev # 1	8	9/20/17	9/29/17																																																
PG-EE1-34	Elevator Inspection	2	10/2/17	10/3/17																																																
Passenger Elevators (6)		183	4/11/17	12/29/17																																																
Pass Cars 1,2,3		183	4/11/17	12/29/17																																																
PG-PE1-02	Delivery & Unload Elev No.1	5	4/11/17	4/17/17																																																
PG-PE1-04	Stage Hoistway	8	4/18/17	4/27/17																																																
PG-PE1-06	Install Brackets/Rails	14	4/28/17	5/17/17																																																

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Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018																																																																																																																			
					N				D				J				F				M				A				M				J				Jul				A				S				O				N				D				J				F				M				A				M				J				Jul				A				S				O				N				D				J				F				M				A				M				J				Jul				A				S				O				N				D			
					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D																																																																																										
Exterior Insuation & Finish Systems					54	7/26/16	10/12/16																																																																																																																																																					
PO-0724a	Document Published	0		7/26/16																																																																																																																																																								
PO-0724b	Document Out to Subs	2	9/8/16	9/9/16																																																																																																																																																								
PO-0724c	Bid Due Date	15	9/12/16	9/30/16																																																																																																																																																								
PO-0724d	Scope Reviewed	3	10/3/16	10/5/16																																																																																																																																																								
PO-0724e	LOI Issued	4	10/6/16	10/12/16																																																																																																																																																								
Expansion Joint Cover Assemblies					24	7/18/16	8/19/16																																																																																																																																																					
PO-0795a	Document Published	0		7/18/16																																																																																																																																																								
PO-0795b	Document Out to Subs	2	7/19/16	7/20/16																																																																																																																																																								
PO-0795c	Bid Due Date	15	7/21/16	8/10/16																																																																																																																																																								
PO-0795d	Scope Reviewed	3	8/11/16	8/15/16																																																																																																																																																								
PO-0795e	LOI Issued	4	8/16/16	8/19/16																																																																																																																																																								
Conveying Equipment					24	7/19/16	8/22/16																																																																																																																																																					
PO-1400a	Document Published	0		7/19/16																																																																																																																																																								
PO-1400b	Document Out to Subs	2	7/20/16	7/21/16																																																																																																																																																								
PO-1400c	Bid Due Date	15	7/22/16	8/11/16																																																																																																																																																								
PO-1400d	Scope Reviewed	3	8/12/16	8/16/16																																																																																																																																																								
PO-1400e	LOI Issued	4	8/17/16	8/22/16																																																																																																																																																								
Security Equipment					24	7/19/16	8/22/16																																																																																																																																																					
PO-2800a	Document Published	0		7/19/16																																																																																																																																																								
PO-2800b	Document Out to Subs	2	7/20/16	7/21/16																																																																																																																																																								
PO-2800c	Bid Due Date	15	7/22/16	8/11/16																																																																																																																																																								
PO-2800d	Scope Reviewed	3	8/12/16	8/16/16																																																																																																																																																								
PO-2800e	LOI Issued	4	8/17/16	8/22/16																																																																																																																																																								
Typical Buy Out					27	7/5/16	8/10/16																																																																																																																																																					
PO-10a	Document Published	0		7/5/16																																																																																																																																																								
PO-10b	Document Out to Subs	2	7/5/16	7/6/16																																																																																																																																																								
PO-10c	Bid Due Date	15	7/7/16	7/27/16																																																																																																																																																								
PO-10d	Scope Reviewed	5	7/28/16	8/3/16																																																																																																																																																								
PO-10e	LOI Issued	5	8/4/16	8/10/16																																																																																																																																																								
Fabrication					256	7/12/16	7/17/17																																																																																																																																																					
PO-402	Steel Fab	59	7/12/16	10/3/16																																																																																																																																																								
PO-422	Elevators	80	7/19/16	11/9/16																																																																																																																																																								
PO-404	Custom AHU's	110	8/31/16	2/8/17																																																																																																																																																								
PO-406	Cooling Towers	40	8/31/16	10/27/16																																																																																																																																																								
PO-410	Generators	130	8/31/16	3/8/17																																																																																																																																																								
PO-412	Co-Gen	90	8/31/16	1/11/17																																																																																																																																																								
PO-414	Switchgear	220	8/31/16	7/17/17																																																																																																																																																								
PO-408	Chillers	110	8/31/16	2/8/17																																																																																																																																																								
PO-416	Podium Facades	80	9/15/16	1/11/17																																																																																																																																																								
PO-PAL-902	PROCURE FOOD SERVICE EQUIP (DA/ DB PACKAGE) Palio	154	9/22/16	5/3/17																																																																																																																																																								
PO-PAL-904	PROCURE HOODS & WALK-IN COOLERS Palio	110	9/22/16	3/1/17																																																																																																																																																								
PO-1RA-904	PROCURE HOODS & WALK-IN COOLERS Rest A	110	9/22/16	3/1/17																																																																																																																																																								
PO-1RA-902	PROCURE FOOD SERVICE EQUIP (DA/ DB PACKAGE) Rest A	154	9/22/16	5/3/17																																																																																																																																																								
PO-1RB-902	PROCURE FOOD SERVICE EQUIP (DA/ DB PACKAGE) Rest B	154	9/22/16	5/3/17																																																																																																																																																								
PO-1RB-904	PROCURE HOODS & WALK-IN COOLERS Rest B	110	9/22/16	3/1/17																																																																																																																																																								
PO-FC-10	PROCURE FOOD SERVICE EQUIP (DA/ DB PACKAGE) Food Court	154	9/22/16	5/3/17																																																																																																																																																								
PO-FC-12	PROCURE HOODS & WALK-IN COOLERS Food Court	110	9/22/16	3/1/17																																																																																																																																																								
PO-EDRK-12	PROCURE FOOD SERVICE EQUIP (DA/ DB PACKAGE) EDR	154	9/22/16	5/3/17																																																																																																																																																								
PO-EDRK-10	PROCURE HOODS & WALK-IN COOLERS EDR	110	9/22/16	3/1/17																																																																																																																																																								

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Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018											
					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	
Weather Tight Enclosure		218	7/24/17	6/15/18																																																
PO-534	Podium Roof (TPO)	30	7/24/17	9/1/17																																																
PO-630	Mechanical Area Roofing (IRMA Soprema)	40	7/31/17	9/25/17																																																
PO-632	All Roofing Complete	0		9/25/17																																																
PO-634	Fully Enclosed / All Facades Complete	0		6/15/18																																																
Mechanical Systems		115	7/24/17	1/8/18																																																
PO-636	Set Donnage	5	7/24/17	7/28/17																																																
PO-640	MEP Screening	15	7/31/17	8/18/17																																																
PO-643	Set Cooling Towers	8	8/14/17	8/23/17																																																
PO-645	Set Chillers	8	8/14/17	8/23/17																																																
PO-644	Set Custom AHU's	10	8/24/17	9/7/17																																																
PO-642	MEP Cooling / Heating Piping	50	8/24/17	11/3/17																																																
PO-650	Main Ductwork Trunks	50	9/8/17	11/20/17																																																
PO-646	MEP Insulation	20	10/30/17	11/28/17																																																
PO-648	Final Connections & Startup	20	12/8/17	1/8/18																																																
Electrical		100	7/18/17	12/7/17																																																
PO-649	Central Plant - TBD	100	7/18/17	12/7/17																																																
Podium Elevators		287	4/27/17	6/14/18																																																
Podium Passenger Elevator PP1		132	10/24/17	5/1/18																																																
PO-BPE-02	Delivery & Unload Elev No.2	2	10/24/17	10/25/17																																																
PO-BPE-04	Stage Hoistway	5	10/26/17	11/1/17																																																
PO-BPE-06	Install Brackets/Rails	15	11/2/17	11/22/17																																																
PO-BPE-08	Set Machine Beams/Machines/OH Eqpt	15	11/24/17	12/14/17																																																
PO-BPE-10	Set Control Room Eqpt	10	12/15/17	12/29/17																																																
PO-BPE-12	Build Car Slings	5	1/2/18	1/8/18																																																
PO-BPE-14	Install Elevator Fronts	20	1/9/18	2/5/18																																																
PO-BPE-16	Install Elevator Fixtures	5	2/6/18	2/12/18																																																
PO-BPE-18	Install Elevator Doors	18	2/13/18	3/8/18																																																
PO-BPE-20	Pipe & Wire Hoistway	5	3/9/18	3/15/18																																																
PO-BPE-22	Work by Others - Pit Ladder, Lights, Disconnects	5	3/16/18	3/22/18																																																
PO-BPE-24	Build Elevator Cab	5	3/23/18	3/29/18																																																
PO-BPE-26	Pipe & Wire Cab	5	3/30/18	4/5/18																																																
PO-BPE-28	Hang Car Doors	5	4/9/18	4/13/18																																																
PO-BPE-30	Elevator Flooring by Others	5	4/16/18	4/20/18																																																
PO-BPE-32	Adjust/Test/Commission Elev # 2	5	4/23/18	4/27/18																																																
PO-BPE-34	Elevator Inspection	2	4/30/18	5/1/18																																																
Podium Passenger Elevator PP2		127	10/24/17	4/24/18																																																
PO-BPE-36	Delivery & Unload Elev	2	10/24/17	10/25/17																																																
PO-BPE-38	Stage Hoistway	3	10/26/17	10/30/17																																																
PO-BPE-40	Install Brackets/Rails	15	10/31/17	11/20/17																																																
PO-BPE-42	Set Machine Beams/Machines/OH Eqpt	15	11/21/17	12/12/17																																																
PO-BPE-44	Set Control Room Eqpt	10	12/13/17	12/27/17																																																
PO-BPE-46	Build Car Slings	5	12/28/17	1/4/18																																																
PO-BPE-48	Install Elevator Fronts	20	1/5/18	2/1/18																																																
PO-BPE-50	Install Elevator Fixtures	5	2/2/18	2/8/18																																																
PO-BPE-52	Install Elevator Doors	18	2/9/18	3/6/18																																																
PO-BPE-54	Pipe & Wire Hoistway	5	3/7/18	3/13/18																																																
PO-BPE-56	Work by Others - Pit Ladder, Lights, Disconnects	5	3/14/18	3/20/18																																																
PO-BPE-58	Build Elevator Cab	5	3/21/18	3/27/18																																																
PO-BPE-60	Pipe & Wire Cab	5	3/28/18	4/3/18																																																

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1st Flr Restaurant A					157	9/6/17	4/19/18																																																
PO-1RA-100	1st Flr Rest A Start	0	9/6/17																																																				
PO-1RA-102	1st Flr Rest A	155	9/6/17	4/17/18																																																			
PO-1RA-900	1st Flr Rest A Complete	0		4/17/18																																																			
Kitchen					157	9/6/17	4/19/18																																																
PO-1RA-924	FRAME WALLS/DOOR FRAMES	25	9/6/17	10/11/17																																																			
PO-1RA-908	MEPS ROUGH-IN WALLS/BACKING	15	10/12/17	11/1/17																																																			
PO-1RA-922	INSTALL HOODS & WALK-IN COOLERS	10	10/12/17	10/25/17																																																			
PO-1RA-926	HANG & INSTALL GREASE DUCT	10	10/12/17	10/25/17																																																			
PO-1RA-930	TERMINATE HOOD TO GREASE DUCT/WRAP	5	10/26/17	11/1/17																																																			
PO-1RA-920	DRYWALL & TAPE WALLS	20	11/2/17	11/30/17																																																			
PO-1RA-916	FRP/STAINLESS WALL COVERING	10	12/1/17	12/14/17																																																			
PO-1RA-918	INSTALL QUARRY TILE FLOOR	10	12/1/17	12/14/17																																																			
PO-1RA-928	INSTALL CEILING GRID	5	12/1/17	12/7/17																																																			
PO-1RA-914	MEPS DROPS TO GRID	10	12/8/17	12/21/17																																																			
PO-1RA-906	INSTALL FOOD SERVICE EQUIPMENT	20	12/15/17	1/15/18																																																			
PO-1RA-948	Install Specialty Equipment	20	12/15/17	1/15/18																																																			
PO-1RA-912	INSTALL CEILING TILE	10	12/22/17	1/8/18																																																			
PO-1RA-910	MEPS WALL/CEILING TRIM	10	1/9/18	1/22/18																																																			
PO-1RA-934	FLS PRE-TESTING (CONTRACTORS)	15	1/23/18	2/12/18																																																			
PO-1RA-940	3RD PARTY SCENARIO / DEVICE VERIFICATION	10	1/23/18	2/5/18																																																			
PO-1RA-932	3RD PARTY REPORT	27	2/13/18	3/21/18																																																			
PO-1RA-938	City of Spfld / 3RD PARTY FINAL	10	3/22/18	4/4/18																																																			
PO-1RA-942	SFD DEVICE CERTIFICATION	10	3/22/18	4/4/18																																																			
PO-1RA-936	TEMPORARY CERTIFICATE OF OCCUPANCY	10	4/5/18	4/19/18																																																			
PO-1RA-944	SITE SIGN OFF / CLEARANCES	10	4/5/18	4/19/18																																																			
PO-1RA-946	Ready for Burn In	0		4/19/18																																																			
1st Flr Restaurant B					155	9/6/17	4/17/18																																																
PO-1RB-100	1st Flr Rest B Start	0	9/6/17																																																				
PO-1RB-102	1st Flr Rest B	155	9/6/17	4/17/18																																																			
PO-1RB-900	1st Flr Rest B Complete	0		4/17/18																																																			
Kitchen					155	9/6/17	4/17/18																																																
PO-1RB-924	FRAME WALLS/DOOR FRAMES	25	9/6/17	10/11/17																																																			
PO-1RB-908	MEPS ROUGH-IN WALLS/BACKING	15	10/12/17	11/1/17																																																			
PO-1RB-922	INSTALL HOODS & WALK-IN COOLERS	10	10/12/17	10/25/17																																																			
PO-1RB-926	HANG & INSTALL GREASE DUCT	10	10/12/17	10/25/17																																																			
PO-1RB-930	TERMINATE HOOD TO GREASE DUCT/WRAP	5	10/26/17	11/1/17																																																			
PO-1RB-920	DRYWALL & TAPE WALLS	20	11/2/17	11/30/17																																																			
PO-1RB-916	FRP/STAINLESS WALL COVERING	10	12/1/17	12/14/17																																																			
PO-1RB-918	INSTALL QUARRY TILE FLOOR	10	12/1/17	12/14/17																																																			
PO-1RB-928	INSTALL CEILING GRID	5	12/1/17	12/7/17																																																			
PO-1RB-914	MEPS DROPS TO GRID	10	12/8/17	12/21/17																																																			
PO-1RB-906	INSTALL FOOD SERVICE EQUIPMENT	20	12/15/17	1/15/18																																																			
PO-1RB-948	Install Specialty Equipment	20	12/15/17	1/15/18																																																			
PO-1RB-912	INSTALL CEILING TILE	10	12/22/17	1/8/18																																																			
PO-1RB-910	MEPS WALL/CEILING TRIM	10	1/9/18	1/22/18																																																			
PO-1RB-934	FLS PRE-TESTING (CONTRACTORS)	15	1/23/18	2/12/18																																																			
PO-1RB-940	3RD PARTY SCENARIO / DEVICE VERIFICATION	10	1/23/18	2/5/18																																																			
PO-1RB-932	3RD PARTY REPORT	25	2/13/18	3/19/18																																																			
PO-1RB-938	City of Spfld / 3RD PARTY FINAL	10	3/20/18	4/2/18																																																			

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					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	
PO-BOH-407	INSTALL DOORS & HARDWARE	5	10/30/17	11/3/17																																																
PO-BOH-403	INSTALL MILLWORK	5	11/6/17	11/10/17																																																
PO-BOH-401	MEPS DROPS TO GRID	15	11/20/17	12/11/17																																																
PO-BOH-404	INSTALL CEILING TILE	10	12/12/17	12/26/17																																																
PO-BOH-406	VCT/CARPET FLOORING & BASE	10	12/12/17	12/26/17																																																
PO-BOH-405	MEPS TRIM WALLS/CEILING	10	12/27/17	1/10/18																																																
PO-BOH-408	OWNER SIGNAGE	5	1/11/18	1/17/18																																																
PO-BOH-409	CLEAN & PUNCHLIST	10	1/18/18	1/31/18																																																
FF&E		50	4/5/18	6/15/18																																																
PO-FFE	FF&E	50	4/5/18	6/15/18																																																
Commissioning		253	8/7/17	8/6/18																																																
PO-COM-102	Commissioning BOH & MEPs	253	8/7/17	8/6/18																																																
PO-COM-103	Permanent Power Available	0		9/11/17																																																
HOTEL		868	2/9/15 A	8/6/18																																																
Design		420	2/9/15 A	10/26/16																																																
Phases		420	2/9/15 A	10/26/16																																																
HT-100	Enabling Phase Deliverables	20	2/9/15 A	3/9/15 A																																																
HT-102	Concept Phase (4Wks)	20	2/9/15 A	3/10/15 A																																																
HT-104	Schematic Design (10 Wks) (SD)	13	3/30/15 A	6/1/15 A																																																
HT-106	Owner Approval - SD	5	4/12/16 A	4/19/16 A																																																
HT-108	Design Development (DD)	50	4/20/16 A	6/8/16 A																																																
HT-110	Owner Approval DD	5	6/9/16 A	6/16/16 A																																																
HT-112	Construction Documents (CD)	70	7/19/16	10/26/16																																																
HT-114	Owner Approval CD	5	10/20/16	10/26/16																																																
Procurement Packages		124	4/19/16 A	10/26/16																																																
HT-128	100%SD - Issue Steel Frame Structure Pkg	0		4/19/16 A																																																
HT-130	100%SD - Issue Vertical Transp Pkg	0		4/19/16 A																																																
HT-122	Issue Facade Mockup Pkg	0		6/8/16 A																																																
HT-124	100%DD - Issue Laundry Chute Pkg	0		7/18/16																																																
HT-134	100%DD - Issue MEP Long Lead Equip Pkg	0		7/18/16																																																
HT-136	100%DD - Issue MEP/Low V D/A Pkg	0		7/18/16																																																
HT-138	20%CD - Issue Drywall & Framing Pkg	0		8/9/16																																																
HT-140	100%CD - Issue Finishes Pkg	0		10/26/16																																																
Permitting Packages		70	6/23/16 A	10/26/16																																																
HT-164	100%DD - Issue for Core & Shell Permit	0		6/23/16 A																																																
HT-162	100%DD - Issue for Full Bldg Permit	0		7/18/16																																																
HT-166	20%CD - Issue for Fit Out Permit	0		10/26/16																																																
Procurement		154	4/1/16 A	12/9/16																																																
HT-PRO-18	Steel Frame Hotel Structure (incl tie-in to Union Chandler)	35	4/1/16 A	5/30/16 A																																																
HT-PRO-12	Elevators	40	4/1/16 A	5/30/16 A																																																
HT-PRO-16	Mockup Package	20	4/12/16 A	6/8/16 A																																																
HT-PRO-22	Long Lead Equipment	40	7/19/16	9/13/16																																																
HT-PRO-24	Hotel MEPs DA Subcontractor	40	7/19/16	9/13/16																																																
HT-PRO-26	Drywall and Framing	30	8/10/16	9/21/16																																																
HT-PRO-28	Hotel Façade Bid & Award	30	8/19/16	9/30/16																																																
HT-PRO-30	Finishes	30	10/27/16	12/9/16																																																
Fabrication		383	7/5/16	1/10/18																																																
HT-414	Fab & Deliver Elevators	100	7/5/16	11/25/16																																																
HT-408	Structural Steel Frame	64	7/5/16	10/3/16																																																
HT-410	DA Mockups w Owner Approval	40	7/5/16	8/29/16																																																

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MGM Springfield Sep 2018 Opening Detailed Schedule



Activity ID	Activity Name	Orig Dur	Start	Finish	2015												2016												2017												2018											
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HT-AT-06	ACT 6th Flr	5	7/17/18	7/23/18																																																
Fixtures / Devices		25	6/25/18	7/30/18																																																
HT-FD-02	Fixtures / Devices / Sconces 2nd Flr	5	6/25/18	6/29/18																																																
HT-FD-03	Fixtures / Devices / Sconces 3rd Flr	5	7/2/18	7/9/18																																																
HT-FD-04	Fixtures / Devices / Sconces 4th Flr	5	7/10/18	7/16/18																																																
HT-FD-05	Fixtures / Devices / Sconces 5th Flr	5	7/17/18	7/23/18																																																
HT-FD-06	Fixtures / Devices / Sconces 6th Flr	5	7/24/18	7/30/18																																																
Carpet		25	7/2/18	8/6/18																																																
HT-CC-02	Corridor Carpet - 2nd Flr	5	7/2/18	7/9/18																																																
HT-CC-03	Corridor Carpet - 3rd Flr	5	7/10/18	7/16/18																																																
HT-CC-04	Corridor Carpet - 4th Flr	5	7/17/18	7/23/18																																																
HT-CC-05	Corridor Carpet - 5th Flr	5	7/24/18	7/30/18																																																
HT-CC-06	Corridor Carpet - 6th Flr	5	7/31/18	8/6/18																																																
Hoistway Finishes		50	1/5/18	3/15/18																																																
HT-HF	Hoistway Bay Finishes	50	1/5/18	3/15/18																																																
Hotel FF&E		50	5/25/18	8/6/18																																																
HT-FFE	FF&E	50	5/25/18	8/6/18																																																
Spa Placeholder		130	9/15/17	3/21/18																																																
HT-SPA-552	STONE - PROCUREMENT/FABRICATION	90	9/15/17	1/24/18																																																
HT-SPA-556	FRAME CEILINGS & SOFFITS	15	9/15/17	10/5/17																																																
HT-SPA-553	MEPS Wall Rough In	15	10/6/17	10/27/17																																																
HT-SPA-554	INSTALL WATE - ROUGH-IN	15	10/6/17	10/27/17																																																
HT-SPA-555	DRYWALL RIPPER	5	10/6/17	10/13/17																																																
HT-SPA-568	ROUGH-IN FOR EQUIPMENT DATA STATIONS	10	10/6/17	10/20/17																																																
HT-SPA-557	MEPS DROPS TO CEILING & SOFFITS	20	10/30/17	11/27/17																																																
HT-SPA-550	MILLWORK - SHOP DRWNGS/COORD/APPROVAL	30	11/28/17	1/10/18																																																
HT-SPA-558	DRYWALL/TAPE/PAINT-WALLS/CEILING	20	11/28/17	12/26/17																																																
HT-SPA-560	INSTALL TILE FLOOR/WALL/COUNTERTOPS IN RESTROOMS	15	12/27/17	1/17/18																																																
HT-SPA-562	INSTALL STOREFRONT GLASS	15	12/27/17	1/17/18																																																
HT-SPA-566	INSTALL SPECIALITY LIGHTING	10	12/27/17	1/10/18																																																
HT-SPA-570	INSTALL CARPET	5	12/27/17	1/3/18																																																
HT-SPA-551	OWNER APPROVAL	10	1/11/18	1/24/18																																																
HT-SPA-567	MEPS TRIM WALLS/CEILING	15	1/11/18	1/31/18																																																
HT-SPA-561	INSTALL PLUMBING FIXTURES	10	1/18/18	1/31/18																																																
HT-SPA-564	INSTALL EXERCISE FLOORING/MATS	5	1/18/18	1/24/18																																																
HT-SPA-569	HANG DOORS & HARDWARE	5	1/18/18	1/24/18																																																
HT-SPA-559	INSTALL MILLWORK/SPECIAL FINISHES (Montble	10	1/25/18	2/7/18																																																
HT-SPA-565	INSTALL MIRROR WALLS IN FITNESS ROOM	10	1/25/18	2/7/18																																																
HT-SPA-563	INSTALL TOILET PARTITIONS & ACCESSORIES	10	2/1/18	2/14/18																																																
HT-SPA-571	OWNER SIGNAGE	5	2/8/18	2/14/18																																																
HT-SPA-572	CLEAN & PUNCHLIST	15	2/15/18	3/7/18																																																
HT-SPA-573	OWNER PUNCH AND FINAL	10	3/8/18	3/21/18																																																
Gym		130	10/16/17	4/19/18																																																
HT-GYM-10	Summary Fit Out	130	10/16/17	4/19/18																																																
Business Center		130	10/16/17	4/19/18																																																
HT-BC-10	Summary Fit Out	130	10/16/17	4/19/18																																																
Room Service Kitchen		150	10/16/17	5/17/18																																																
HT-RSK-10	FRAME WALLS/DOOR FRAMES	20	10/16/17	11/10/17																																																
HT-RSK-16	MEPS ROUGH-IN WALLS/BACKING	15	11/13/17	12/4/17																																																
HT-RSK-12	INSTALL HOODS & WALK-IN COOLERS	10	11/13/17	11/27/17																																																

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					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D																																																						
Fabrication					80	1/25/17	5/17/17																																																																																																					
95SS-400	Fab for Fit Out	80	1/25/17	5/17/17																																																																																																								
Construction					380	7/5/16	1/5/18																																																																																																					
95SS-500	Demo	50	7/5/16	9/13/16																																																																																																								
95SS-502	Core & Shell	60	12/27/16	3/21/17																																																																																																								
95SS-504	Fit Out	200	3/22/17	1/5/18																																																																																																								
95SS-999	COMPLETE Move In Ready (16 Wks Prior to Final TCO)	0		1/5/18																																																																																																								
Elevator Modernization					77	9/14/16	1/5/17																																																																																																					
95SS-244	Delivery & Unload Elev	2	9/14/16*	9/15/16																																																																																																								
95SS-246	Stage Hoistway	3	9/16/16	9/20/16																																																																																																								
95SS-248	Install Brackets/Rails	18	9/21/16	10/17/16																																																																																																								
95SS-250	Set Machine Beams/Machines/OH Eqpt	10	10/18/16	10/31/16																																																																																																								
95SS-252	Set Control Room Eqpt	10	10/18/16	10/31/16																																																																																																								
95SS-254	Build Car Sling	5	11/1/16	11/7/16																																																																																																								
95SS-256	Install Elevator Fronts	10	11/8/16	11/22/16																																																																																																								
95SS-258	Install Elevator Fixtures	5	11/23/16	11/30/16																																																																																																								
95SS-260	Install Elevator Doors	5	11/23/16	11/30/16																																																																																																								
95SS-262	Pipe & Wire Hoistway	5	12/1/16	12/7/16																																																																																																								
95SS-264	Work by Others - Pit Ladder, Lights, Disconnects	5	12/1/16	12/7/16																																																																																																								
95SS-266	Build Elevator Cab	5	12/8/16	12/14/16																																																																																																								
95SS-268	Pipe & Wire Cab	4	12/9/16	12/14/16																																																																																																								
95SS-270	Hang Car Doors	5	12/15/16	12/21/16																																																																																																								
95SS-272	Elevator Flooring by Others	3	12/22/16	12/27/16																																																																																																								
95SS-274	Adjust/Test/Commission Elev # 2	4	12/28/16	1/3/17																																																																																																								
95SS-276	Elevator Inspection	2	1/4/17	1/5/17																																																																																																								
101 STATE ST					753	2/9/15 A	2/20/18																																																																																																					
Design					533	2/9/15 A	4/6/17																																																																																																					
Phases					498	2/9/15 A	2/16/17																																																																																																					
101SS-102	Enabling Phase Deliverables	20	2/9/15 A	5/8/15 A																																																																																																								
101SS-104	Concept Design	20	2/9/15 A	6/1/15 A																																																																																																								
101SS-108	Schematic Design (SD)	25	7/5/16	8/8/16																																																																																																								
101SS-110	Owner Approval - SD	5	8/9/16	8/15/16																																																																																																								
101SS-112	Design Development (DD)	48	8/16/16	10/24/16																																																																																																								
101SS-116	Owner Approval DD	5	10/25/16	10/31/16																																																																																																								
101SS-118	Construction Documents (CD)	69	11/1/16	2/9/17																																																																																																								
101SS-122	Owner Approval CD	5	2/10/17	2/16/17																																																																																																								
Procurement Pkgs					143	9/12/16	4/6/17																																																																																																					
101SS-124	100%SD - Issue Seismic Pkg	0		9/12/16																																																																																																								
101SS-126	100%DD - Issue Demolition Pkg	0		10/31/16																																																																																																								
101SS-128	100%CD - Issue Core & Shell Pkg	0		2/9/17																																																																																																								
101SS-130	100%CD - Issue Fitout Pkg	0		4/6/17																																																																																																								
Permit Pkgs					44	9/19/16	11/22/16																																																																																																					
101SS-140	50%DD Issue for Core & Shell Permit	0		9/19/16																																																																																																								
101SS-142	20%CD - Issue for Fitout Permit	0		11/22/16																																																																																																								
Host Community Pkgs					98	9/19/16	2/9/17																																																																																																					
101SS-180	50%DD - Submission to City of Springfield	0		9/19/16																																																																																																								
101SS-182	50%CD - Submission to City of Springfield	0		12/14/16																																																																																																								
101SS-184	100%CD - Submission to City of Springfield	0		2/9/17																																																																																																								
Permitting					80	2/17/17	6/12/17																																																																																																					
101SS-202	Core & Shell Permit R/A	40	2/17/17	4/14/17																																																																																																								

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					N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S	O	N	D	J	F	M	A	M	J	Jul	A	S																																																																																	
Construction					100	1/8/18	5/29/18																																																																																																																																									
DAV-500	Construction	100	1/8/18	5/29/18																																																																																																																																												
DAYCARE					370	10/31/16	4/18/18																																																																																																																																									
Design					55	10/31/16	1/19/17																																																																																																																																									
DAY-112	Construction Documents (CD)	50	10/31/16	1/12/17																																																																																																																																												
DAY-114	Owner Approval CD	5	1/13/17	1/19/17																																																																																																																																												
Permitting					40	12/7/16	2/2/17																																																																																																																																									
DAY-118	50% CD Permitting Submission	40	12/7/16	2/2/17																																																																																																																																												
Procurement					40	1/13/17	3/9/17																																																																																																																																									
DAY-120	Procurement	40	1/13/17	3/9/17																																																																																																																																												
Fabrication					60	7/5/17	9/27/17																																																																																																																																									
DAY-122	Fab & Deliver	60	7/5/17	9/27/17																																																																																																																																												
Construction					140	9/28/17	4/18/18																																																																																																																																									
DAY-116	Summary	140	9/28/17	4/18/18																																																																																																																																												
DAY-117	LEED Platinum Commissioning	40	2/21/18	4/18/18																																																																																																																																												
ENTERTAINMENT BLK (F/O)					263	4/20/17	5/3/18																																																																																																																																									
Procurement					154	4/20/17	11/28/17																																																																																																																																									
EB-TS-10	PROCURE FOOD SERVICE EQUIPMENT (DA/DB PACKAGE)	154	4/20/17	11/28/17																																																																																																																																												
EB-TS-12	PROCURE HOODS & WALK-IN COOLERS	110	4/20/17	9/25/17																																																																																																																																												
Interior Fit Outs					170	8/31/17	5/3/18																																																																																																																																									
1st Flr Bowling					115	9/5/17	2/16/18																																																																																																																																									
EB-BOW-100	1st Flr Bowling Start	0	9/5/17																																																																																																																																													
EB-BOW-102	1st Flr Bowling	115	9/5/17	2/16/18																																																																																																																																												
EB-BOW-900	1st Flr Bowling Complete	0		2/16/18																																																																																																																																												
Tap Sportsbar					165	9/5/17	4/30/18																																																																																																																																									
Kitchen					165	9/5/17	4/30/18																																																																																																																																									
EB-TS-32	FRAME WALLS/DOOR FRAMES	30	9/5/17	10/17/17																																																																																																																																												
EB-TS-16	MEPS ROUGH-IN WALLS/BACKING	15	10/18/17	11/7/17																																																																																																																																												
EB-TS-30	INSTALL HOODS & WALK-IN COOLERS	10	10/18/17	10/31/17																																																																																																																																												
EB-TS-34	HANG & INSTALL GREASE DUCT	10	10/18/17	10/31/17																																																																																																																																												
EB-TS-38	TERMINATE HOOD TO GREASE DUCT/WRAP	5	11/1/17	11/7/17																																																																																																																																												
EB-TS-28	DRYWALL & TAPE WALLS	20	11/8/17	12/6/17																																																																																																																																												
EB-TS-24	FRP/STAINLESS WALL COVERING	10	12/7/17	12/20/17																																																																																																																																												
EB-TS-26	INSTALL QUARRY TILE FLOOR	10	12/7/17	12/20/17																																																																																																																																												
EB-TS-36	INSTALL CEILING GRID	5	12/7/17	12/13/17																																																																																																																																												
EB-TS-22	MEPS DROPS TO GRID	10	12/14/17	12/28/17																																																																																																																																												
EB-TS-14	INSTALL FOOD SERVICE EQUIPMENT	20	12/21/17	1/19/18																																																																																																																																												
EB-TS-56	Install Specialty Equipment	20	12/21/17	1/19/18																																																																																																																																												
EB-TS-20	INSTALL CEILING TILE	10	12/29/17	1/12/18																																																																																																																																												
EB-TS-18	MEPS WALL/CEILING TRIM	10	1/15/18	1/26/18																																																																																																																																												
EB-TS-42	FLS PRE-TESTING (CONTRACTORS)	15	1/29/18	2/16/18																																																																																																																																												
EB-TS-48	3RD PARTY SCENARIO / DEVICE VERIFICATION	10	1/29/18	2/9/18																																																																																																																																												
EB-TS-40	3RD PARTY REPORT	30	2/19/18	3/30/18																																																																																																																																												
EB-TS-46	City of Spfld / 3RD PARTY FINAL	10	4/2/18	4/16/18																																																																																																																																												
EB-TS-50	SFD DEVICE CERTIFICATION	10	4/2/18	4/16/18																																																																																																																																												
EB-TS-44	TEMPORARY CERTIFICATE OF OCCUPANCY	10	4/17/18	4/30/18																																																																																																																																												
EB-TS-52	SITE SIGN OFF / CLEARANCES	10	4/17/18	4/30/18																																																																																																																																												
EB-TS-54	Ready for Burn In	0		4/30/18																																																																																																																																												
1st Flr Entertainment Rtl					115	9/5/17	2/16/18																																																																																																																																									
EB-1ER-100	1st Flr Entertainment Rtl Start	0	9/5/17																																																																																																																																													

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APPENDIX B

PRESENTATION TO THE ACCESS AND OPPORTUNITY COMMITTEE OF JULY 12, 2016

Access and Opportunity Committee

July 12, 2016



Agenda

1. Outreach Update
2. Construction Workforce
3. Design Commitments
4. Construction Commitments



Outreach Update



OUTREACH UPDATE

1. Outreach to MBE, WBE & VBE Companies
2. Outreach to local Community Groups
3. Community Partners Network
4. Diversity Task Force
5. Union Partnership & Outreach
 - Union Referral System Update, Progress, Successes
6. Outreach Events
 - Tishman Construction Outreach Session for the MGM Springfield Parking Garage
 - Springfield Regional Chamber of Commerce Annual Meeting
 - National Association of Minority Contractors (NAMC) 2016 Annual Conference
 - Other Diversity Outreach Work
 - Upcoming Events

OUTREACH TO MBE, WBE & VBE COMPANIES

Design & Consulting:

Ref	Company	Location	Diversity Status
1	Davenport Advisors, LLC.	Boston, MA	MBE/WBE

Construction:

Ref	Company	Location	Diversity Status
1	C.R. Levesque Trucking Corp.	Monson, MA	WBE
2	East Coast Air Barrier & Restoration, Inc.	Pittsfield, MA	WBE
3	Regis Steel Corporation ⁽¹⁾	Fall River, MA	MBE
4	Welch Associates Land Surveyors, Inc.	West Bridgewater, MA	WBE

Notes:

(1) Regis Steel Corporation is both a Construction Contractor and Supplier of Steel and Iron.

Suppliers/Vendors:

Ref	Company	Location	Diversity Status
1	ACES Enterprises, LLC.	Dunlap, IL	VBE
2	C & D Electronics, Inc.	Holyoke, MA	MBE/WBE
3	Industrial Flame Cutting, Inc.	Beacon Falls, CT	VBE

OUTREACH TO LOCAL COMMUNITY GROUPS/ ORGANIZATIONS/ DEPARTMENTS

Ref	Organizations	Location
1	A.W.A.K.E. Inc.	Springfield, MA
2	Community Partners Network	Springfield, MA
3	Community Works	Springfield, MA
4	Neighbor to Neighbor	Springfield, MA
5	New North Citizens Council	Springfield, MA
6	Springfield Technical Community College Office of Workforce Development	Springfield, MA
7	Springfield Veterans Services Dept.	Springfield, MA
8	Training Resources of America	Springfield & Western MA
9	Uptown Construction Collaborative	Springfield, MA
10	W. Mass COSH	Western Massachusetts

COMMUNITY PARTNERS NETWORK

Ref	Organization	Location
1	A.W.A.K.E. Inc.	Springfield, MA
2	Betterman Construction, Inc.	Springfield, MA
3	Career Point	Holyoke, MA
4	Carpenters Union #108	Springfield, MA
5	Community Works	Springfield, MA
6	East African Cultural Center	Springfield, MA
7	Gandara Springfield Family Resource Center	Springfield, MA
8	Greater Springfield NAACP	Springfield, MA
9	HAP Housing	Springfield, MA
10	Ironworkers Union #7	Springfield, MA
11	Lighthouse	Springfield, MA
12	Ludlow Veterans Services Organization	Ludlow, MA
13	Neighbor to Neighbor	Springfield/Holyoke, MA
14	New North Citizens Council	Springfield, MA
15	Partners for Community	Springfield/Holyoke, MA

Notes:

(1) Organizations highlighted in yellow represent new organizations to the network since last AOC meeting.

COMMUNITY PARTNERS NETWORK

Ref	Organization	Location
16	ROCA	Springfield, MA
17	School Based Services	Springfield, MA
18	Springfield Partners for Community Action	Springfield, MA
19	Springfield Veterans Services Dept.	Springfield, MA
20	Springfield Vets Center	West Springfield, MA
21	STCC Workforce Development Department	Springfield, MA
22	Training Resources of America	Western Massachusetts
23	Urban League of Greater Springfield	Springfield, MA
24	Veteran's Inc.	Springfield, MA
25	We The Villagers	Springfield, MA
26	Western Mass. COSH	Western Massachusetts
27	Western Mass. Employment Collaborative	Springfield, MA
28	Westover Job Corps.	Westover, MA
29	YWCA/Youth Build	Springfield, MA

Notes:

(1) Organizations highlighted in yellow represent new organizations to the network since last AOC meeting.

COMMUNITY PARTNERS NETWORK

June 20, 2016: Meeting with MGM Springfield Construction Team

Meeting Highlights:

- 14 Community Partners attended; some who are new to the Network
- MGM Springfield shared current Diversity workforce numbers to date with the Network
- Discussion around the meaning of “Success”
- Update on the work of the Steering/Executive Committee
 - Applying for grants/funding for construction related workforce readiness and development



COMMUNITY PARTNERS NETWORK

- MGM Springfield Referral & Tracking System Update: Report on status of referrals from Community Partners and Discussion around better tracking of referrals and follow up
- Creation of the Referral Intake & Work Readiness Sub-Committees:
 - Assessment of Basic Union Eligibility and Tracking
 - Assessment of Work Readiness Status
- Advocacy: Specific issues/policies; and types of advocacy



COMMUNITY PARTNERS NETWORK

- Getting People Ready for Success: Training Calendar
 - OSHA 10 Training/Certification
 - Work Readiness Certification
 - “A Day In The Life of a Union Member”
 - Financial Literacy
 - Basic Math Refresher
 - Conflict Resolution



DIVERSITY TASK FORCE

June 29, 2016: Meeting held

Meeting Highlights:

- Meeting attended by union representatives, community partners' network representatives, MGM Springfield Construction & Diversity team, and Tishman Construction.
- Review of the goals of the Diversity Task Force and the differences between the Diversity Task Force and the Community Partners Network.



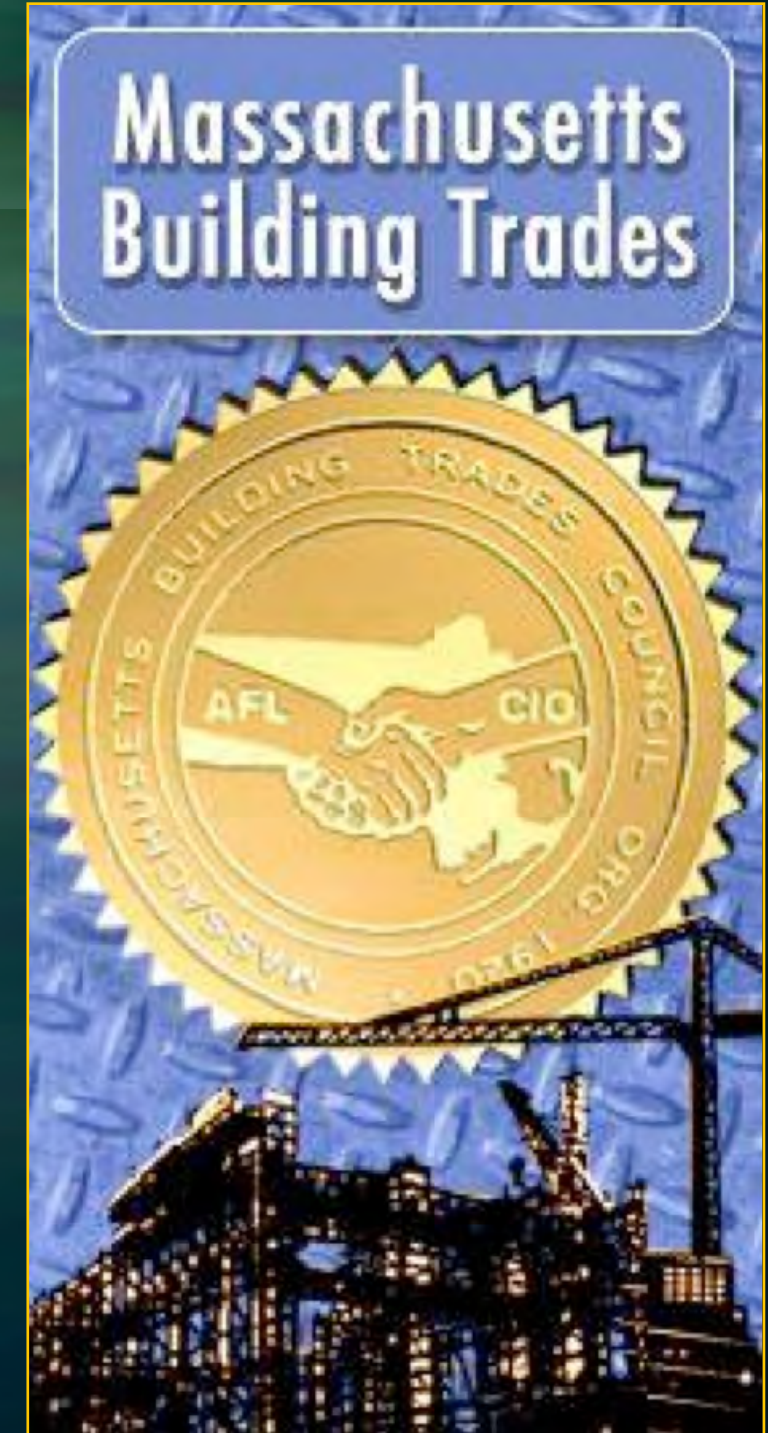
DIVERSITY TASK FORCE

- Task Force mission/goals include:
 - Opening and maintaining effective communication lines and relationships between community partners and trade unions.
 - Address issues/barriers identified by the Community Partners Network of diverse populations in joining a union and being successful as a union member.
 - Working together on outreach, partnerships, and initiatives to increase diversity.
- MGM Springfield Construction shared information on current and upcoming scopes of work, and project workforce diversity statistics to date.
- MGM and Union Representatives shared diversity success stories of new diverse individuals being accepted into the unions, and stories of current diverse union members who were out of work but are now working on the MGM Springfield site.

UNION PARTNERSHIP & OUTREACH

Continued meetings and discussions with local trade unions to include:

- Assistance with targeted diversity recruitment based on the needs of the individual trade union through the MGM Springfield and Community Partners Network referral work.
- Revisiting the unions' current bench and diversity as many unions have decreased their bench and taken in new diverse members.
- Sharing success stories and best practices for putting diverse members to work.
- Partnerships on upcoming outreach events.

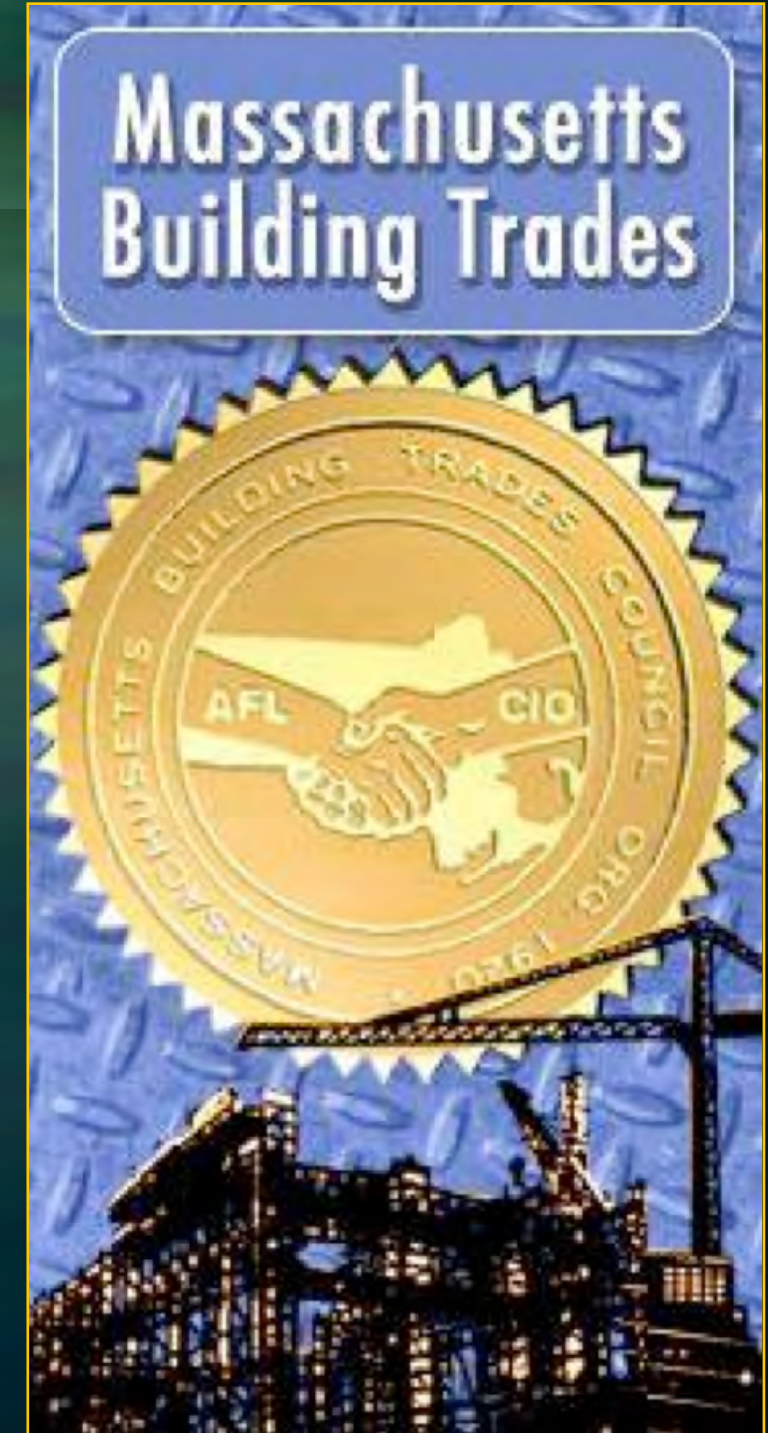


UNION REFERRAL SYSTEM UPDATE

Continued referrals and tracking of new diverse union applicants in their union application process.

Capturing and tracking success stories and highlights:

- **6 new diverse individuals** were successfully accepted into local trade unions through the MGM Springfield Union Referral System and are ready for work.



OTHER DIVERSITY WORK & OUTREACH/ EVENTS

- **June 1, 2016:** Tishman Construction Outreach Session for Regional and Minority, Women, and Veteran Owned Companies

Tishman
Construction
Corporation
of Massachusetts
An AECOM Company

MGM
Springfield -
Parking Garage



MGM GARAGE FROM I-91 (Rendering courtesy of MGM Springfield)

Invitation for Regional and Minority, Women and Veteran Owned Construction Companies

Tishman Construction invites union-based construction companies to attend an outreach event to learn more about potential opportunities. Diverse businesses must be certified with one of the following entities:

- Massachusetts Supplier Diversity Office
- Greater New England Minority Supplier Development Council
- Women's Business Enterprise National Council • Department of Veteran Affairs

This is an opportunity for subcontractors to meet with the project team. MGM and Tishman are committed to exceeding the diverse contracting goals for this project and also contracting with regionally-based businesses.

Some of the upcoming scopes of work for construction are:

- **Thermal & Moisture Protection**
 - Fluid Applied Waterproofing ■ EPDM Roofing
- **Openings**
 - Hollow Metal Doors and Frames ■ Finish Hardware
 - Entrances, Storefronts and Curtain Walls
 - Glass and Glazing
- **Finishes**
 - Gypsum Wallboard System ■ Tile Work n Painting
- **Specialties Signage**
 - Fire Protection Specialties
 - Vinyl Coated Chain-link Security Screen
 - Miscellaneous Specialties

Come see us on:
Wednesday, June 1st, 2016
At 3:00 pm
MassMutual Center
1277 Main Street • Springfield, MA
Register by emailing: mgmspringfield@aecom.com



OTHER DIVERSITY WORK & OUTREACH/ EVENTS

- **June 1, 2016:** Springfield Regional Chamber of Commerce Annual Business Meeting



- **June 14 - 17, 2016:** National Association of Minority Contractors (NAMC) 47th National Conference



OTHER DIVERSITY WORK & OUTREACH/ EVENTS

- **June 22, 2016:** Massachusetts Supplier Diversity Office Workshop Series at the Reggie Lewis Athletic Center, Roxbury
- **June 23, 2016:** New North Citizens Council Urban Workforce Planning Coalition
- **June 27 - 28, 2016:** MGM Springfield Diversity Calls/Check-In's with MGM Springfield Subcontractors

UPCOMING OUTREACH/ EVENTS

- **July 2016:** Sub-Contractor Kick Off Meetings - Diversity Workforce & Commitments Review
- **July 11, 2016:** Community Partners Network
- **July 13, 2016:** Construction Open House - Call for MBE, WBE, and VBE, Suppliers/Vendors for MEP
- **July 16, 2016:** Diversity Task Force
- **July 16, 2016:** OSHA 10 Training/Certification with Community Partners Network
- **July 28, 2016:** Construction Open House - Call for Contractors for 95 & 101 State St.



BUILDING A

STRONG FOUNDATION

ARE YOU A MINORITY, WOMAN, OR VETERAN-OWNED MECHANICAL, ELECTRICAL OR PLUMBING SUPPLIER/VENDOR?

Qualified MBE, WBE and VBE MEP suppliers & vendors are invited to one-on-one information sessions to learn about opportunities related to the MGM Springfield casino podium and hotel.

When: Wednesday, July 13
30-minute slots available from 9 a.m. to 3 p.m.
BY APPOINTMENT ONLY
To schedule an appointment, email construction@mgmspringfield.com

Where: MGM Springfield
Community Office
One Monarch Place, Suite 910
Springfield, MA 01144

MGM Springfield and Tishman Construction representatives will meet with MBE, WBE and VBE MEP suppliers & vendors to explain the scope of upcoming work; the prequalification process; and MGM Springfield's policy on vendors and purchasing. There will also be an overview of the project's diversity requirements for both workforce and construction.



[f](#) [t](#)

Building Excitement.

Construction Workforce



WORKFORCE DIVERSITY STATISTICS - UNION

AS OF JUNE 29, 2016

Group	Project Goals	Project To Date %
Women	6.90%	8.09%
Minority	15.30%	39.54%
Veteran	8.00%	7.83%

Notes:

(1) Statistics include all workforce reports that were received by MGM as of June 29, 2016.

WORKFORCE DIVERSITY STATISTICS - TOTAL

AS OF JUNE 29, 2016

Group	Project Goals	Project To Date %
Women	6.90%	9.87%
Minority	15.30%	29.45%
Veteran	8.00%	9.38%

Notes:

- (1) Statistics include all workforce reports that were received by MGM as of June 29, 2016.
- (2) The Diversity plan approved by the MGC allows reporting to include hours allocated to multiple diversity categories. 5.51% of total workforce hours are included in two of the diversity categories. There are currently 152 out of 205,246.25 hours that are reported within three diversity categories, or 0.0007%.
- (3) While this is not a reporting requirement of the approved diversity plan, the total hours worked through 2nd Quarter 2016 is as follows:
 - Approximately 35% are from Springfield/ Surrounding Communities
 - Approximately 56% are from Western Massachusetts
 - Approximately 82% are from Massachusetts

WORKFORCE 3 MONTH LOOK AHEAD

1. **Work in Progress** - Water/Sewer Infrastructure
2. **Work in Progress** - Site Prep for Garage
3. **Work in Progress** - 73 State Street Support & Enclosure
4. **Work in Progress** - Temp Power Connections Support for Tower Crane
5. **Work in Progress** - French Church Utilities and Foundations
6. **Work in Progress** - Garage Foundations
7. **Work in Progress** - Underground MEP for Garage
8. **Work in Progress** - Union Chandler Facade Preservation/Demo
9. **Work in Progress** - Systems Separation 95/101 State
10. **Work in Progress** - Hotel-Podium Foundations - includes mini piles & rock anchors
11. July 2016 - Generator Switch Gear Area
12. July 2016 - Dave's Furniture Abatement & Demo
13. August 2016 - Water Retention Basin
14. September 2016 - Tower Crane Erection
15. September 2016 - Pre-cast Garage Elements

Design & Construction Commitments



DESIGN & CONSTRUCTION COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Variance	Company Count	Value
WBE	10.0%	13.2%	3.2%	40	\$25.75M
MBE	5.0%	6.6%	1.6%	24	\$12.91M
VBE	2.0%	6.4%	4.4%	10	\$12.56M

Notes:

(1) Total Commitments through June 30, 2016 are \$195.2M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

Design & Consulting Commitments



DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	12.3%	14	\$4.08M
MBE	5.0%	11.2%	13	\$3.72M
VBE ⁽³⁾	2.0%	2.9%	2	\$0.96M

Notes:

(1) Total Commitments through June 30, 2016 are \$33.3M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(3) Value for VBE (Stevens & Associates) is included in the Construction Commitments because they are being billed through Tishman.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
1	A I Engineers, Inc.	Construction Engineering and Inspection	Middletown, CT	MBE
2	AAC Investments, LLC	Interior Design	Los Angeles, CA	WBE
3	AFO Project Consulting, LLC	Construction Consulting	Las Vegas, NV	VBE
4	Akal Engineering, Inc.	MEP Consulting Engineering Services	Berlin, MA	MBE
5	Andelman & Lelek Engineering, Inc.	Energy Modeling	Norwood, MA	WBE
6	Black Hawk Group	Consulting Engineer Services	Philadelphia, PA	MBE
7	C&C Consulting Engineers, LLC	Structural Peer Review	Allston, MA	MBE
8	Calvin Consulting Services, LLC	Construction Consulting	Las Vegas, NV	WBE
9	Communications for Design LLC	Design and Project Management Support Services	Northfield, MN	WBE
10	Convergent Technologies	Acoustics/ Audio Visual/ IT/ Low Voltage	Lockport, NY	WBE
11	Copley Wolff Design Group, Inc.	Full Landscape Architectural Services	Boston, MA	WBE
12	Desert Construction Consulting, Ltd	Estimating and Contractor Bidding Services	Henderson, NV	MBE
13	Desman, Inc.	Parking Garage Bridging Documents (LOA)	Boston, MA	MBE
14	Dietz & Company Architects, Inc.	Full Service Architecture and Interior Design	Springfield, MA	WBE
15	Engineers Design Group, Inc.	Structural Engineering Consulting Services	Malden, MA	MBE

Notes:

(1) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(2) Green highlighted companies have been paid as of May 31, 2016.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DESIGN & CONSULTING COMMITMENTS

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
16	Erin Chrusciel Photography, LLC	Photography	East Longmeadow, MA	WBE
17	Fernandez & Associates	Fire Protection Design and Code Consulting Services	Byfield, MA	MBE
18	Keville Enterprises, Inc.	Construction Management and Inspection	Marshfield, MA	WBE
19	Marshall Moya Design, LLC	Architectural Services	Washington, DC	MBE
20	MCLA, Inc.	Lighting	Washington, DC	WBE
21	Nitsch Engineering, Inc.	Engineering Services	Boston, MA	WBE
22	Pari Riahi Architects, Inc.	Executive Architect	Amherst, MA	WBE
23	Renderready, LLC	Rendering and Graphic Design	Henderson, NV	MBE
24	Soden Sustainability Consulting, LLC	LEED	Winchester, MA	WBE
25	Spec's Design Group, LLC	Interior Design	Springfield, MA	WBE
26	Stevens & Associates	Façade Stabilization Design	Brattleboro, VT	VBE
27	Timothy Haahs & Associates, Inc.	Architect and Engineer of Record/ Parking Consultant	Blue Bell, PA	MBE
28	VAV International, Inc.	Mechanical Consulting	Woburn, MA	MBE
29	WA Architects, Inc.	Architectural Services	Cleveland, OH	MBE

Notes:

(1) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(2) Green highlighted companies have been paid as of May 31, 2016.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

Construction Commitments



CONSTRUCTION COMMITMENTS

THROUGH JUNE 30, 2016

Group	Project Goals	Commitments	Company Count	Value
WBE	10.0%	13.4%	26	\$21.67M
MBE	5.0%	5.7%	11	\$9.19M
VBE ⁽³⁾	2.0%	7.2%	8	\$11.60M

Notes:

(1) Total Commitments through June 30, 2016 are \$161.9M.

(2) Includes companies that are certified with the following agencies:

- MBE - Massachusetts Supplier Diversity Office or Greater New England Minority Supplier Development Council.
- WBE - Massachusetts Supplier Diversity Office or Women's Business Enterprise National Council.
- VBE - United States Department of Veteran Affairs or Massachusetts Gaming Commission.

(3) Connecticut Temperature controls VBE diversity is not currently being counted pending a review by the Massachusetts Gaming Commission.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
1	All American Signs	Signage	Plymouth, MA	VBE
2	American Environmental, Inc.	Abatement	Holyoke, MA	MBE
3	Arrow Security Corporation	Security Guard Services	Springfield, MA	VBE
4	Ayala Excavating and Trucking, LLC	Trucking	Springfield, MA	MBE
5	BECO Electrical Contractors, Inc.	Electrical	Monson, MA	VBE
6	Berkshire Concrete Cutting, LLC	Saw Cutting	Torrington, CT	WBE
7	C&C Contractors, LLC	Trucking Services	Springfield, MA	MBE
8	C&D Electronics, Inc.	Cabling, Wiring, Electronics Supplier	Holyoke, MA	WBE
9	CK Flooring Solutions, Inc.	Carpet Installer	Chicopee, MA	WBE
10	CMJ, LLC	Property Management/Maintenance	Springfield, MA	MBE
11	Connecticut Drywall Finishing, Inc.	Drywall	West Springfield, MA	WBE
12	Connecticut Temperature Controls, LLC	Controls	Newington, CT	VBE
13	Coghlin Electrical Contractors, Inc.	Electrical Services	Worcester, MA	WBE
14	EDM Construction, Inc.	Carpentry & Structural Steel Erection	Merrimac, MA	WBE
15	E L Waterman, Inc.	Pipe Supplier	Foxboro, MA	WBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
16	Evermore Light & Power, Inc.	Electrical	Somerville, MA	WBE
17	Fabiano Oil Corp.	Fuel & Oil Supplier	Wrentham, MA	WBE
18	Federal Concrete, Inc.	Concrete Services	Hopedale, MA	WBE
19	Fletcher Sewer & Drain, Inc.	Inspection - FEIR	Ludlow, MA	WBE
20	Folan Waterproofing and Construction Company, Inc.	Masonry Contractors & Waterproofing	South Easton, MA	WBE
21	Frisoli Electric, Inc.	Electrical	Holbrook, MA	VBE
22	Gomes Construction Co. Inc.	Utility Connections	Ludlow, MA	WBE
23	Granite City Electric Supply Company, Inc.	Electrical Supplier	Quincy, MA	WBE
24	H B Welding, Inc.	Steel, Welding, Iron Work	Johnston, RI	WBE
25	JRL Construction, Inc.	General Contractor - Demolition	Springfield, MA	VBE
26	Kittredge Equipment Company, Inc.	Kitchen Equipment	Agawam, MA	WBE
27	L.K. Sheet Metal, Inc.	Sheet Metal	East Hartford, CT	WBE
28	Larry's Trucking Co.	Trucking	Springfield, MA	MBE
29	Lindon Group	Piping Materials	East Providence, RI	WBE
30	Medeiros Hydroseeding & Landscaping Construction, Inc.	Trucking and Soil Materials	Monson, MA	MBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

DIVERSE CONSTRUCTION COMPANIES

THROUGH JUNE 30, 2016

Ref	Company	Scope	Location	Diversity Status
31	New England Foundation Company, Inc.	Helical Piles	Andover, MA	WBE
32	Northeastern Steel Corporation	Steel Distributor	Revere, MA	MBE
33	Optimum Building & Inspection, Inc.	Carpentry	Springfield, MA	MBE
34	Performance Testing & Balancing LLC	Testing & Balancing	South Hampton, MA	VBE
35	Rebars & Mesh, Inc.	Concrete	Haverhill, MA	WBE
36	Regis Steel Corporation	Steel Erection/ Reinforcing	Fall River, MA	MBE
37	S&F Concrete Contractors, Inc.	Concrete	Hudson, MA	MBE
38	Security Construction Services, Inc.	Fencing	Hudson, MA	WBE
39	Steere Engineering, Inc.	Engineering Services	Warwick, RI	WBE
40	Strategic Environmental Services, Inc.	Environmental Consultants	Sutton, MA	WBE
41	T & M Equipment Corporation	Excavating Contractor	Springfield, MA	VBE
42	Titan Roofing Company	Roofing	Springfield, MA	MBE
43	Triton Leasing and Rental, Inc.	Demolition & Abatement	Feeding Hills, MA	WBE
44	Ultimate Abatement Company, Inc.	Abatement	Plainfield, MA	WBE
45	Willow Tree Outdoor, LLC	Landscape	Springfield, MA	WBE

Notes:

(1) Green highlighted companies have worked on site and been paid as of May 31, 2016.

WBE = Woman-owned Business Enterprise; MBE = Minority-owned Business Enterprise; VBE = Veteran-owned Business Enterprise.

APPENDIX C

CONSTRUCTION WORKFORCE STATISTICS AS OF JUNE 29, 2016

MGM Springfield
Company Workforce Diversity Report
As of: June 29, 2016

Reference	Company	This Month's Workforce Diversity Statistics								Project To Date Workforce Diversity Statistics							
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
1	Acranom Masonry Enterprises, Inc.	3	128.00	0.00	0.00%	72.00	56.25%	0.00	0.00%	12	1,026.50	0.00	0.00%	554.50	54.02%	0.00	0.00%
2	AeroClean	5	206.00	0.00	0.00%	142.00	68.93%	0.00	0.00%	11	1,286.00	0.00	0.00%	758.00	58.94%	0.00	0.00%
3	Allied Fire Protection, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,354.00	0.00	0.00%	256.00	18.91%	0.00	0.00%
4	American Environmental, Inc.	8	312.00	0.00	0.00%	240.00	76.92%	0.00	0.00%	157	24,890.75	1,514.00	6.08%	22,211.25	89.23%	288.50	1.16%
5	Ayotte & King For Tile, Inc	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	24	450.50	0.00	0.00%	4.00	0.89%	0.00	0.00%
6	Bay Crane Northeast	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	10.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	Bay State Elevator Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	315.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
8	BECO Electrical Contractors, Inc.	7	423.00	0.00	0.00%	168.00	39.72%	255.00	60.28%	11	3,169.50	0.00	0.00%	1,028.50	32.45%	1,915.00	60.42%
9	Berkshire Concrete Cutting	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	9.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
10	Champlain Masonry, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	36	5,090.75	100.00	1.96%	1,965.00	38.60%	679.50	13.35%
11	Chandler Architectural Products	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	13	455.50	0.00	0.00%	53.00	11.64%	64.00	14.05%
12	CK Flooring Solutions, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	231.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
13	Collins Electrical	8	417.50	107.00	25.63%	199.00	47.66%	95.50	22.87%	17	2,820.00	749.50	26.58%	540.00	19.15%	877.00	31.10%
14	Commonwealth Guardrail, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	17	690.00	4.00	0.58%	69.00	10.00%	0.00	0.00%
15	Connecticut Drywall Finishing, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	20	1,335.50	0.00	0.00%	158.50	11.87%	0.00	0.00%
16	Conte Company, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	24.00	0.00	0.00%	0.00	0.00%	8.00	33.33%
17	EDM Construction, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	103.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
18	EF Corcoran Plumbing & Heating, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	16.00	16.00	100.00%	0.00	0.00%	0.00	0.00%
19	Evermore Light and Power, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	613.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
20	Federal Concrete, Inc.	29	1,790.50	144.00	8.04%	377.00	21.06%	132.00	7.37%	31	3,052.50	328.00	10.75%	696.00	22.80%	275.00	9.01%
21	Fontaine Bros, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	40	5,476.00	568.00	10.37%	2,016.00	36.82%	0.00	0.00%
22	Food Equipment Installation, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	116.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
23	Frisoli Electric Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	299.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
24	Gagliarducci Construction, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	42	4,157.00	635.00	15.28%	709.50	17.07%	796.50	19.16%
25	Harry Grodsky & Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	29	5,446.00	322.50	5.92%	26.00	0.48%	0.00	0.00%
26	Hayward Baker Inc.	11	561.00	48.00	8.56%	203.00	36.19%	0.00	0.00%	11	561.00	48.00	8.56%	203.00	36.19%	0.00	0.00%
27	Cyn Environmental Services	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	24.00	0.00	0.00%	24.00	100.00%	0.00	0.00%
28	JDC Demolition	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	15	2,802.00	202.00	7.21%	416.00	14.85%	40.00	1.43%
29	JRL Construction, Inc.	16	1,550.25	110.00	7.10%	439.00	28.32%	334.75	21.59%	34	7,223.75	1,136.00	15.73%	4,012.50	55.55%	795.25	11.01%
30	L.K. Sheet Metal, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	2,925.50	294.00	10.05%	0.00	0.00%	0.00	0.00%
31	Langan Insulation LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	568.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
32	Marr Scaffold	2	17.00	0.00	0.00%	17.00	100.00%	0.00	0.00%	13	487.00	0.00	0.00%	131.00	26.90%	0.00	0.00%
33	Marguerite Concrete	2	20.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	27.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
34	Medeiros Hydroseeding & Landscape Construction, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	17.00	0.00	0.00%	11.00	64.71%	0.00	0.00%
35	Moran Sheet Metal, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	115.50	0.00	0.00%	24.00	20.78%	0.00	0.00%
36	New England Foundation Co., Inc.	13	794.00	0.00	0.00%	197.50	24.87%	0.00	0.00%	16	1,394.50	0.00	0.00%	338.00	24.24%	0.00	0.00%
37	Northeast Steel Erectors	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	1,335.00	34.00	2.55%	183.00	13.71%	393.00	29.44%
38	Northeastern Steel Corporation	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	64.00	9.00	14.06%	50.00	78.13%	0.00	0.00%
39	Northern General	11	847.00	65.00	7.67%	168.00	19.83%	0.00	0.00%	38	9,856.50	471.50	4.78%	1,446.00	14.67%	62.00	0.63%
40	P. Gioioso & Sons Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	834.50	114.50	13.72%	0.00	0.00%	0.00	0.00%
41	Palmer Paving Corporation	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	25	352.00	3.00	0.85%	0.00	0.00%	0.00	0.00%
42	Performance Testing & Balancing, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	64.00	0.00	0.00%	0.00	0.00%	38.00	59.38%
43	Professional Drywall Construction Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	64	3,793.50	196.50	5.18%	776.50	20.47%	347.00	9.15%
44	RoadSafe Traffic Systems	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	25.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
45	S & F Concrete Contractors, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	12	221.00	0.00	0.00%	83.50	37.78%	0.00	0.00%
46	Safespan	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	356.00	0.00	0.00%	56.00	15.73%	0.00	0.00%
47	Save-On-Wall Co., Inc.	6	97.00	16.00	16.49%	16.00	16.49%	0.00	0.00%	9	290.50	45.00	15.49%	45.00	15.49%	8.00	2.75%
48	Security Construction Services, Inc. d/b/a: Security Fence Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	13	3,826.00	300.00	7.84%	1,193.25	31.19%	0.00	0.00%
49	Soep Painting Corp	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	1,475.50	0.00	0.00%	6.00	0.41%	0.00	0.00%
50	Stamford Wrecking	3	127.00	0.00	0.00%	34.00	26.77%	0.00	0.00%	6	639.00	0.00	0.00%	58.00	9.08%	0.00	0.00%
51	Superior Caulking & Waterproofing Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	7	193.00	0.00	0.00%	155.50	80.57%	0.00	0.00%
52	T & M Equipment Corporation	15	1,022.50	80.50	7.87%	259.50	25.38%	72.00	7.04%	47	7,100.55	605.00	8.52%	1,802.05	25.38%	72.00	1.01%
53	Tech Valley Contracting, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	2,018.00	206.00	10.21%	0.00	0.00%	0.00	0.00%
54	Tishman	5	600.00	0.00	0.00%	240.00	40.00%	240.00	40.00%	10	9,400.00	1,840.00	19.57%	1,840.00	19.57%	3,760.00	40.00%
55	Titan Roofing Company	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	38	1,720.50	0.00	0.00%	201.00	11.68%	138.00	8.02%
56	T.J. Conway Company	4	272.00	0.00	0.00%	72.00	26.47%	0.00	0.00%	20	1,065.50	0.00	0.00%	295.00	27.69%	0.00	0.00%
57	Triton Leasing and Rental, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	34	3,187.50	0.00	0.00%	1,547.50	48.55%	0.00	0.00%
58	Ultimate Abatement Company, Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	43	8,510.00	1,230.00	14.45%	8,510.00	100.00%	0.00	0.00%
59	Universal Electric Co.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	18	5,635.00	556.50	9.88%	1,284.50	22.80%	394.00	6.99%
60	William Roberts Electric Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	292.50	0.00	0.00%	93.00	31.79%	0.00	0.00%
61	Willow Tree Outdoor, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	5	261.50	0.00	0.00%	105.50	40.34%	0.00	0.00%

MGM Springfield
Company Workforce Diversity Report
As of: June 29, 2016

Reference	Company	This Month's Workforce Diversity Statistics							Project To Date Workforce Diversity Statistics								
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
62	Wolfe House Movers, LLC	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	1,112.00	0.00	0.00%	306.00	27.52%	204.00	18.35%
63	Wolverine Fire Protection Co	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	272.00	0.00	0.00%	96.00	35.29%	0.00	0.00%
64	Worcester Elevator Co., Inc.	-	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	12.00	0.00	0.00%	0.00	0.00%	6.00	50.00%
Total - Unions		148	9,184.75	570.50	6.21%	2,844.00	30.96%	1,129.25	12.29%	1,072	142,495.30	11,528.00	8.09%	56,338.05	39.54%	11,160.75	7.83%
65	On-Site Design / Management	49	4,304.25	623.00	14.47%	542.00	12.59%	360.00	8.36%	122	62,750.95	8,720.00	13.90%	4,109.00	6.55%	8,092.00	12.90%
Total		197	13,489.00	1,193.50	8.85%	3,386.00	25.10%	1,489.25	11.04%	1,194	205,246.25	20,248.00	9.87%	60,447.05	29.45%	19,252.75	9.38%

Totals - Overall			
Group	Project Goals	Project To Date	Delta
Women	6.90%	9.87%	2.97%
Minority	15.30%	29.45%	14.15%
Veteran	8.00%	9.38%	1.38%

Notes:

- (1) Statistics Include all workforce reports that were received by MGM as of June 29, 2016.
- (2) Approximate number of unique union workers on site is 1,023, and the approximate total workers on site is 1,145. The difference in total is attributed to workers working for multiple companies.

MGM Springfield
Union Workforce Diversity Report
As of: June 29, 2016

Reference	Union	This Month's Workforce Diversity Statistics						Project To Date Workforce Diversity Statistics									
		Employee Count	This Month's Total Hours	Women		Minority		Veteran		Employee Count	Project To Date Total Hours	Women		Minority		Veteran	
				Hours	%	Hours	%	Hours	%			Hours	%	Hours	%	Hours	%
1	AFSCME Local #230	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	48.00	0.00	0.00%	48.00	100.00%	0.00	0.00%
2	Asbestos Workers #6	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	25	2,864.50	0.00	0.00%	1,483.50	51.79%	0.00	0.00%
3	Boston Plasters' & Cement Masons' - Asphalt Layers' Union #534	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	25.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
4	Bricklayers Local #1	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	299.00	0.00	0.00%	11.00	3.68%	0.00	0.00%
5	Bricklayers Local #3	1	56.00	0.00	0.00%	56.00	100.00%	0.00	0.00%	59	5,949.50	206.00	3.46%	1,326.00	22.29%	679.50	11.42%
6	Carpenters - Local #108	30	2,164.50	144.00	6.65%	696.50	32.18%	304.00	14.04%	129	13,152.00	608.00	4.62%	3,729.00	28.35%	3,554.00	27.02%
7	Carpenters Local #107	1	120.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	760.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
8	Carpenters Local #210	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	16.00	0.00	0.00%	0.00	0.00%	8.00	50.00%
9	Carpenters Local #33	3	49.00	16.00	32.65%	0.00	0.00%	0.00	0.00%	5	160.00	45.00	28.13%	0.00	0.00%	0.00	0.00%
10	Carpenters Local #475	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	39.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
11	CT Bricklayers #1	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	24.00	0.00	0.00%	24.00	100.00%	0.00	0.00%
12	Floorcoverers Local #2168	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	15	304.50	0.00	0.00%	4.00	1.31%	0.00	0.00%
13	International Association of Iron Workers Local #7	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	19	1,751.00	43.00	2.46%	315.00	17.99%	597.00	34.09%
14	International Brotherhood of Electrical Workers - IBEW Local #455	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	112.25	50.75	45.21%	112.25	100.00%	0.00	0.00%
15	International Brotherhood of Electrical Workers - IBEW Local #7	15	840.50	107.00	12.73%	367.00	43.66%	350.50	41.70%	56	12,893.50	1,306.00	10.13%	2,978.00	23.10%	3,186.00	24.71%
16	International Union of Elevator Constructors Local #41	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	10	327.00	0.00	0.00%	0.00	0.00%	6.00	1.83%
17	International Union of Operating Engineers - IUOE Local #4	8	302.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	27	2,660.00	0.00	0.00%	0.00	0.00%	40.00	1.50%
18	International Union of Operating Engineers - IUOE Local #98	18	1,136.00	48.00	4.23%	268.00	23.59%	0.00	0.00%	84	10,287.05	67.00	0.65%	877.05	8.53%	970.50	9.43%
19	International Union of Painters and Allied Trades - IUPAT District #11	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	125.50	0.00	0.00%	0.00	0.00%	0.00	0.00%
20	International Union of Painters and Allied Trades - IUPAT Local #1333	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	9	306.50	0.00	0.00%	29.00	9.46%	64.00	20.88%
21	Iron Workers District Council of New England	6	244.00	0.00	0.00%	128.00	52.46%	0.00	0.00%	9	633.00	72.00	11.37%	282.00	44.55%	0.00	0.00%
22	Laborers' District Council	4	197.00	0.00	0.00%	101.00	51.27%	0.00	0.00%	4	197.00	0.00	0.00%	101.00	51.27%	0.00	0.00%
23	Laborer's International Union of North America - LIUNA Building Wreckers Local #1421	2	66.00	0.00	0.00%	66.00	100.00%	0.00	0.00%	155	24,515.75	1,474.75	6.02%	23,365.25	95.31%	0.00	0.00%
24	Laborers Local #22	8	469.50	0.00	0.00%	32.00	6.82%	60.00	12.78%	9	1,394.00	0.00	0.00%	32.00	2.30%	102.00	7.32%
25	Laborers Local #223	2	108.00	0.00	0.00%	54.00	50.00%	0.00	0.00%	2	108.00	0.00	0.00%	54.00	50.00%	0.00	0.00%
26	Laborers Local #230	1	24.00	0.00	0.00%	24.00	100.00%	0.00	0.00%	4	276.25	0.00	0.00%	266.75	96.56%	0.00	0.00%
27	Laborers Local #243	1	142.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	1,812.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
28	Laborers Local #39	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	124.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
29	Laborers Local #455	3	96.00	0.00	0.00%	96.00	100.00%	0.00	0.00%	14	3,818.00	1,035.50	27.12%	3,818.00	100.00%	0.00	0.00%
30	Laborers Local #473	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	8	1,092.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
31	Laborers Local #547	1	64.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	320.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
32	Laborers Local #596	7	458.50	65.00	14.18%	168.00	36.64%	0.00	0.00%	69	10,029.75	790.00	7.88%	3,363.00	33.53%	45.00	0.45%
33	Laborers Local #609	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	3	67.50	0.00	0.00%	8.00	11.85%	0.00	0.00%
34	Laborers Local #611	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	270.50	0.00	0.00%	270.50	100.00%	0.00	0.00%
35	Laborers Local #665	2	48.00	0.00	0.00%	48.00	100.00%	0.00	0.00%	7	1,349.50	32.00	2.37%	1,349.50	100.00%	0.00	0.00%
36	Laborers Local #675	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	133.50	0.00	0.00%	133.50	100.00%	0.00	0.00%
37	Laborers Local #88 [Tunnel Workers]	2	115.50	0.00	0.00%	8.00	6.93%	0.00	0.00%	4	196.50	0.00	0.00%	8.00	4.07%	0.00	0.00%
38	Laborers Local #999	25	1,797.75	190.50	10.60%	497.50	27.67%	414.75	23.07%	153	26,386.25	5,051.00	19.14%	10,947.75	41.49%	1,844.75	6.99%
39	NY Bricklayers #2	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	1	4.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
40	Operating Engineers Local #4	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	276.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
41	Operating Engineers Local #478	1	54.00	0.00	0.00%	54.00	100.00%	0.00	0.00%	2	62.00	0.00	0.00%	54.00	87.10%	0.00	0.00%
42	Painters and Allied Trades District Council #35	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	24	2,717.50	0.00	0.00%	164.50	6.05%	0.00	0.00%
43	Pile Drivers Local #56	5	360.50	0.00	0.00%	108.00	29.96%	0.00	0.00%	10	710.00	0.00	0.00%	264.50	37.25%	0.00	0.00%
44	Plumbers & Pipefitters #104	4	272.00	0.00	0.00%	72.00	26.47%	0.00	0.00%	50	6,527.50	338.50	5.19%	321.00	4.92%	0.00	0.00%
45	Roofers #248	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	30	1,516.00	0.00	0.00%	206.00	13.59%	26.00	1.72%
46	Sheet Metal Workers #17	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	4	116.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
47	Sheet Metal Workers #40	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	2	436.00	0.00	0.00%	0.00	0.00%	0.00	0.00%
48	Sheet Metal Workers #63	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	22	2,766.50	294.00	10.63%	24.00	0.87%	38.00	1.37%
49	Sprinkler Fitters #669	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	15	1,626.00	0.00	0.00%	352.00	21.65%	0.00	0.00%
50	Teamsters' #404	0	0.00	0.00	0.00%	0.00	0.00%	0.00	0.00%	6	909.50	114.50	12.59%	16.00	1.76%	0.00	0.00%
Subtotal - Other Unions		150	9,184.75	570.50	6.21%	2,844.00	30.96%	1,129.25	12.29%	1,082	142,495.30	11,528.00	8.09%	56,338.05	39.54%	11,160.75	7.83%
51	On-Site Design / Management	49	4,304.25	623.00	14.47%	542.00	12.59%	360.00	8.36%	122	62,750.95	8,720.00	13.90%	4,109.00	6.55%	8,092.00	12.90%
Total		199	13,489.00	1,193.50	8.85%	3,386.00	25.10%	1,489.25	11.04%	1,204	205,246.25	20,248.00	9.87%	60,447.05	29.45%	19,252.75	9.38%

Totals - Overall			
Group	Project Goals	Project To Date	Delta
Women	6.90%	9.87%	2.97%
Minority	15.30%	29.45%	14.15%
Veteran	8.00%	9.38%	1.38%

Notes:

- (1) Statistics include all workforce reports that were received by MGM as of June 29, 2016.
- (2) Approximate number of unique union workers on site is 1,023, and the approximate total workers on site is 1,145. The difference in total is attributed to workers working for multiple companies and/or multiple unions.
- (3) Approximate number of unique union workers on site for the month of June is 148, and the approximate total workers on site is 197. The difference in total is attributed to workers working for multiple companies and/or multiple unions.

APPENDIX D

LETTER REGARDING COST OF CONSTRUCTION AND CAPITALIZATION OF GAMING LICENSE



August 26, 2016

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Quarterly Report – Second Quarter 2016

Dear Commissioners:

In accordance with 205 CMR 135.02(5)(a) of the Massachusetts Gaming Commission Monitoring of Project Construction and Licensee Requirements (the “Monitoring Regulations”), please see on the attached Exhibit A the costs of construction, infrastructure improvements and related costs incurred by Blue Tarp reDevelopment, LLC (“MGM”) through June 30, 2016 in connection with the development of MGM Springfield project in Springfield, Massachusetts (the “Project”) compared to MGM’s cost estimates as of that date, which costs have been calculated in accordance with 205 CMR 122.03: Costs Included in the Calculation of Capital Investment.

In addition, in accordance with 205 CMR 135.02(b) of the Monitoring Regulations, I direct you to the publicly-filed financial statements of MGM Resorts International, the parent company of Blue Tarp reDevelopment, LLC (the “Licensee”), including MGM’s Quarterly Report on Form 10-Q for the quarterly period ended June 30, 2016, filed with Securities and Exchange Commission (the “SEC”) on August 8, 2016, which is available at www.sec.gov. As reflected in these financial statements, the Licensee has sufficient resources in order to meet all expected financial obligations relating to the completion of the gaming establishment and related infrastructure improvements associated with the Project.

I hereby certify that the foregoing and attached information is truthful and accurate to the best of my knowledge and belief.

Sincerely,

Seth N. Stratton
Vice President & General Counsel

cc: Michael Mathis, President & COO
Edward Pikula, Esq., Springfield City Solicitor

EXHIBIT A

Q2 2016 COST ESTIMATE (\$mm)

Ref	Description	Incurred To Date	Remaining	Total Estimate
1	Construction / Design	\$60.4	\$436.3	\$496.7
2	FF&E	\$0	\$75.0	\$75.0
3	OSE	\$0	\$43.7	\$43.7
	Subtotal of Eligible Cap. Costs	\$60.4	\$555.0	\$615.4
4	Land	\$49.5	\$1.8	\$51.3
5	Off-site Parcel Improvements	\$11.2	\$0.2	\$11.4
6	License/ Application Fees	\$85.0	\$0	\$85.0
7	Pre-opening Exp. / Host Comm. Costs	\$34.0	\$88.5	\$122.5
8	Fin. Costs / Capitalized Int.	\$8.2	\$60.3	\$68.5
9	Project Contingency	\$0	\$35.0 - \$41.8	\$35.0 - \$41.8
	Subtotal of Ineligible Costs	\$187.9	\$185.8- \$192.6	\$373.7 - \$380.5
	Total	\$248.3	\$740.8 - \$747.6	\$989.1 - \$995.9

Notes:

(1) Majority of Contingency will be spent on Eligible Capital Costs.

(2) The figures above are approximations to the nearest hundred thousand, which in some instances results in minor discrepancies (\$100k or less) in sums.

APPENDIX E

CONSTRUCTION SITE PROGRESS IMAGES AS OF JUNE 30, 2016

OVERALL SITE PROGRESS



Overall Site Activity - June 28, 2016

OVERALL SITE PROGRESS



Aerial View - April 22, 2016



Aerial View - June 26, 2016

PARKING GARAGE



Garage Site Preparation - April 11, 2016



Garage Footings - May 5, 2016



Garage Construction - May 18, 2016

PARKING GARAGE



Garage Construction - June 6, 2016



Garage Construction - June 8, 2016

PARKING GARAGE



Garage Construction - June 24, 2016



Garage Construction - June 24, 2016



Garage Construction - June 25, 2016

PODIUM EARTHWORK & FOUNDATIONS



Backfill Along Main Street - June 1, 2016



Mass Excavation - June 9, 2016

PODIUM EARTHWORK & FOUNDATIONS



Podium Footings Prepared - June 21, 2016



Podium Footings Prepared - June 21, 2016



Podium Footings Prepared - June 25, 2016

FRENCH CHURCH RELOCATION



Preparing for relocation - April 4, 2016



Church move - April 19, 2016



Church move remarks - April 19, 2016

FRENCH CHURCH RELOCATION



Church move - April 19, 2016



Church arrives at new location - April 19, 2016



Church in new location - April 27, 2016

FRENCH CHURCH NEW FOUNDATION



New Church Foundation - May 6, 2016



New Church Foundation - May 17, 2016



New Church Foundation - May 17, 2016

FRENCH CHURCH NEW FOUNDATION



New Church Foundation - June 20, 2016



New Church Foundation - June 28, 2016

DEMOLITION - ARMORY REAR PORTION



Armory Demolition - May 5, 2016



Armory Demolition - May 5, 2016

DEMOLITION - ARMORY REAR PORTION



Armory Back Demolition - May 6, 2016



Armory Back Demolition - May 6, 2016



Armory Back Completion - May 26, 2016

DEMOLITION - 73 STATE STREET REAR PORTION



73 State Demolition - May 7, 2016



73 State Demolition - June 1, 2016



73 State Demolition - June 20, 2016

DEMOLITION - 73 STATE STREET REAR PORTION



73 State Demolition - June 20, 2016



73 State Demolition - June 21, 2016



73 State Demolition - June 24, 2016

DEMOLITION - 73 STATE STREET REAR PORTION



73 State Demolition - June 24, 2016



73 State Demolition - June 24, 2016



73 State Demolition - June 28, 2016

DEMOLITION - YWCA



YWCA Demolition - April 5, 2016



YWCA Demolition - April 8, 2016



YWCA Demolition - April 21, 2016



YWCA Site Cleared - April 27, 2016

UNION CHANDLER FACADE STABILIZATION



Union Chandler - May 6, 2016



Union Chandler - May 17, 2016



Union Chandler - May 17, 2016

UNION CHANDLER FACADE STABILIZATION



Union Chandler Test Pile- June 9, 2016



Union Chandler - June 21, 2016

95 STATE STREET INTERIORS



95 State Boiler Work - May 9, 2016



95 State St. 10th Floor - June 13, 2016

95 STATE STREET INTERIORS



95 State St.- June 13, 2016



95 State St.- June 13, 2016



95 State St.- June 20, 2016

SITE UTILITY/UNDERGROUND WORK



Union St. Pipes - May 18, 2016



Offsite Utilities - May 20, 2016

SITE UTILITY/UNDERGROUND WORK



Vault Progress - May 24, 2016



Offsite Utility Work - June 13, 2016



UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

The Construction of Plainridge Park Casino

Spending, Employment, and Economic Impacts

September 19, 2016

Rod Motamedi and Thomas Peake

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

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Executive Summary

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). In this report, UMDI describes the activities undertaken to construct the Plainridge Park Casino (PPC) in Plainville, Massachusetts and measures the economic impacts generated through this process.

The construction of Plainridge Park Casino occurred over two phases: the architecture, engineering, and design phase, which took place from 2010 until 2014, and the actual construction phase, which went from 2014 to 2015. Of the two phases, the vast majority of spending occurred during construction. In both cases, most of the spending was spent on goods and services supplied by firms within Massachusetts.

Table 1: Architecture, Engineering, and Design Spending by Region

Region	2010	2011	2012	2013	2014
Metro Boston	\$1,587,109	\$0	\$829,751	\$413,303	\$3,898,523
Bristol and Norfolk Counties	\$803,095	\$0	\$1,948,792	\$1,517,836	\$1,724,919
Rest of Western MA	\$74,940	\$0	\$0	\$0	\$0
Rest of Southeastern MA	\$7,000	\$0	\$0	\$0	\$277,846
Lower Pioneer Valley	\$0	\$0	\$0	\$0	\$92,405
Central MA	\$0	\$0	\$0	\$0	\$0
Out-of-state	\$9,781	\$0	\$22,726	\$25,410	\$88,520
Total	\$2,481,925	\$0	\$2,801,268	\$1,956,549	\$6,082,213
Massachusetts Total	\$2,472,144	\$0	\$2,778,543	\$1,931,139	\$5,993,692

Source: Massachusetts Gaming Commission

Table 2: Construction Phase Spending by Industry

Industry	Total	Percent Spent in MA
Construction	\$91,875,994	87%
Manufacturing Goods	\$15,098,255	100%
Wholesale	\$4,041,560	4%
Insurance and Bonds	\$1,428,153	100%
Other	\$1,343,505	100%
Rental and Leasing	\$879,412	100%
Administration And Waste	\$718,271	0%
Total	\$115,385,150	85%

Source: Pinck & Co.

The economic gains from the construction of Plainridge Park mainly accrued to the areas around the casino, including Norfolk County, where Plainville is located, and neighboring Bristol County, while the Metro Boston area to the north and the South Shore and Cape and Islands communities to the southeast also saw boosts in employment, output, value added, and personal income. All told, 170 jobs were created in Massachusetts during the architecture, engineering, and design phase, while 1,116 jobs

were created in the construction phase.¹ The architecture, engineering, and design phase of the project produced \$24.3 million² in output, or new economic activity, while the construction phase generated \$165.6 million. Of that output, \$16.7 million in the architecture, engineering, and design phase and \$105.1 million in the construction phase was net new, also known as value added.³

Table 3: Economic Impacts of the Architecture, Engineering, and Design Phase, 2010-2014

Category	Employment	Output	Value Added	Personal Income
Bristol and Norfolk Counties	76	\$9.7	\$6.8	\$4.7
Metro Boston	75	\$12.5	\$8.5	\$5.8
Rest of Southeastern MA	12	\$1.3	\$0.9	\$1.3
Central MA	3	\$0.4	\$0.2	\$0.5
Lower Pioneer Valley	2	\$0.2	\$0.1	\$0.1
Rest of Western MA	1	\$0.1	\$0.1	\$0.1
Total	170	\$24.3	\$16.7	\$12.5

Source: Pinck & Co.; Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute

Table 4: Economic Impacts of the Construction Phase, 2014-2015

Category	Employment	Output	Value Added	Personal Income
Bristol and Norfolk Counties	755	\$102.7	\$65.6	\$47.8
Metro Boston	203	\$43.9	\$27.6	\$22.1
Rest of Southeastern MA	114	\$13.5	\$8.5	\$15.4
Central MA	39	\$4.8	\$2.9	\$5.9
Lower Pioneer Valley	4	\$0.6	\$0.4	\$0.2
Rest of Western MA	1	\$0.1	\$0.1	\$0.0
Total	1,116	\$165.6	\$105.1	\$91.5

Source: Pinck & Co.; Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute

¹ These are job-years, which are equivalent to one worker being hired for one year's worth of labor. So two workers working half of the time for a year would be 1 job-year, while a single worker working the full year for two years would equal 2 job-years.

² Numbers throughout this report are sometimes rounded for the sake of easy presentation. Therefore, numbers in figures and tables may not always sum perfectly to their associated totals.

³ For a more detailed description of output and value added, see page 9.

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 to construct the Plainridge Park Casino (PPC) in Plainville, Massachusetts and measures the economic impacts generated through this process.

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.⁴ To reduce internal competition among casinos and maximize their potential benefits, the Commonwealth was divided into three regions, shown in Figure 1, 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 with the host communities distributed across the state as shown in Figure 2. The subject of this report, Plainridge Park Casino, which is the singular slot parlor, is the only venue currently operating. The status of the Region C casino license is complicated by the decision of the MGC to not award a license to the only commercial bidder, which hoped to open in Brockton,⁵ and the recent U.S. District Court ruling invalidating the land in trust granted to the Mashpee Wampanoag tribe for a casino in nearby Taunton.⁶

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."⁷ 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.⁸ The role of UMDI in the larger research agenda is to collect data on and measure the economic impacts of the introduction of casinos in Massachusetts.

This report seeks to inform stakeholders about the construction of Plainridge Park Casino and its economic contribution to the Commonwealth. Over the course of 2014 and 2015, UMDI worked with the MGC and its construction management vendors to obtain data on the spending, employment, and wages related to the construction of PPC. These data are presented in this report along with an estimate of the total economic impacts to the Commonwealth of Massachusetts resulting from the casino construction.

⁴ <<http://massgaming.com/about/expanded-gaming-act>>

⁵ <http://massgaming.com/wp-content/uploads/16-025RegionC.pdf>

⁶ https://www.gpo.gov/fdsys/pkg/USCOURTS-mad-1_16-cv-10184/pdf/USCOURTS-mad-1_16-cv-10184-0.pdf

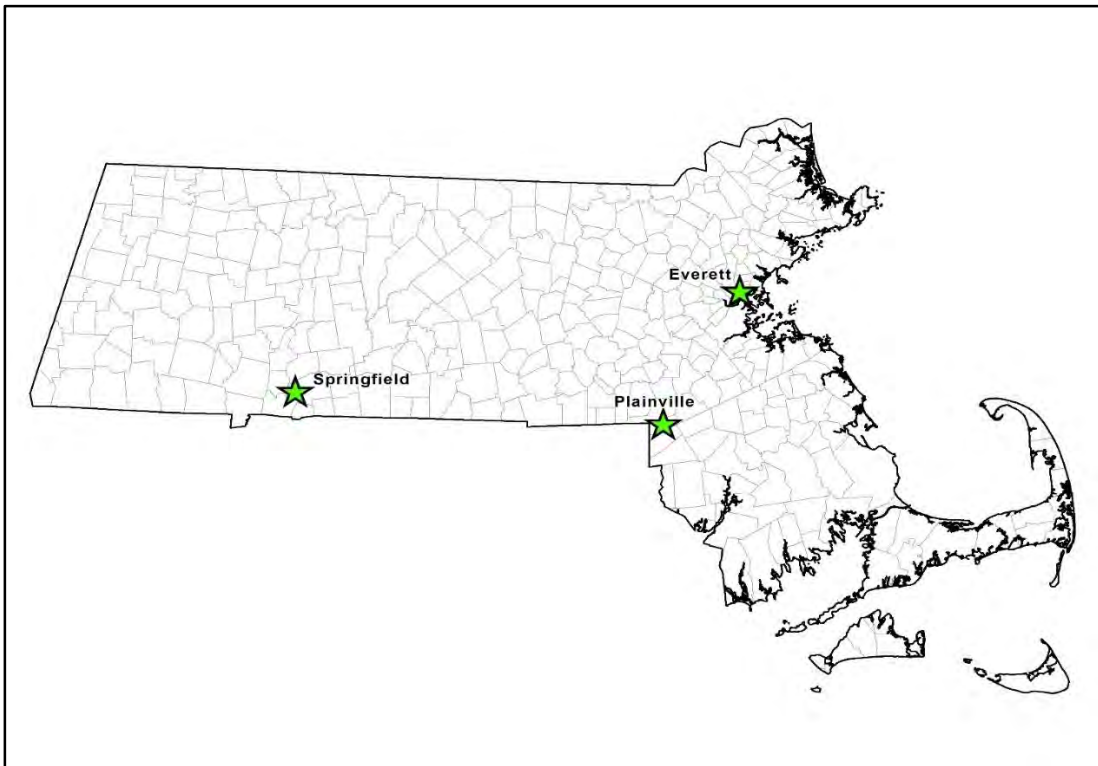
⁷ <<http://massgaming.com/about/research-agenda>>

⁸ 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: Massachusetts Gaming Regions⁹



Figure 2: Locations of Approved Massachusetts Casinos



⁹ <<http://massgaming.com/about/expanded-gaming-act>>

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.

Pre-construction activities including engineering, architecture and design took place in the years between 2010 and 2014. More than \$13.3 million was spent during this phase. The building of Plainridge Park Casino began in earnest in the second quarter of 2014 and finished prior to the casino's opening day on June 24, 2015. During this time, a total of \$92 million was spent on construction in addition to \$23 million on other related purchases. This total includes money spent on both in-state and out-of-state vendors. The lead contractor, the Boston office of Turner Construction Company,¹⁰ oversaw the renovation of the 50,000 square foot simulcast building and construction of the single-story, 106,000 sq. ft. casino, which is a pre-engineered metal building. Turner also supervised the completion of the new parking garage. The racetrack remained open for harness racing throughout construction, beginning its season in April 2015 as scheduled.¹¹

¹⁰ Turner project background: <<http://www.turnerconstruction.com/experience/project/694D/penn-gaming-at-plainridge-park-casino>>

¹¹ 2015 PPC racing schedule:

<<http://www.plainridgeparkcasino.com/~media/Plainridge/pdfs/racing/schedule/plainridge-live-racing-2015.ashx>>

Glossary for Economic Impacts

In this section, we define 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 whether the labor of a self-employed proprietor. Additionally, jobs are counted as job-years, which are equivalent to one job lasting for one year. It is a similar concept to “person-hours.” New 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. For example, 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 value of production, sales, or business revenues, whether final (i.e., purchased by the end user) or intermediate (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 is 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 and is why all nations and US states report their economic growth by using it, 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 data from the general contractor in charge of building Plainridge Park Casino. These data were then prepared for and run through an economic impact model to produce an estimate of the impacts of construction on Massachusetts and its regions. UMDI worked in collaboration with Pinck & Co., which is the Massachusetts Gaming Commission's construction management vendor overseeing the Plainridge Park Casino project. In turn, Pinck & Co. worked with Turner Construction to obtain the necessary data and provide it to UMDI.

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 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 spending, the number of workers, and wages, 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.

More information on the PI⁺ model and the methods used to prepare the data from Pinck & Co. for use in the model can be found at the end of this report in Appendices 1 and 2.

Data Collection

Pinck & Co. served as a data intermediary between UMDI and Turner Construction. Pinck & Co. forwarded to Turner a data request template prepared by UMDI that took into account the data needs of the economic model and the qualitative and quantitative data of importance to the public. Data on spending and wages were provided quarterly to UMDI beginning at the end of the third quarter of 2014.

Due to the ramp-up of construction activity, the second and third quarters of 2014 were aggregated into one data delivery. Based on advice from Pinck & Co., UMDI split the combined second and third quarter spending into separate values for the second (Q2) and third (Q3) quarters of 2014 using 40 percent of the combined value for Q2 and 60 percent for Q3. This methodology cannot be applied to employment as it would result in fractions of jobs. Therefore employment and wages are still combined for Q2 and Q3 of 2014.

The specific data requested included construction spending by NAICS code, location of the supplier by state, and the building for which the spending was intended. For example, the data show how much

concrete was sourced from Massachusetts for use in the construction of the parking garage. Employment and wage data were organized by the zip code of residence of the workers.

Data on architecture, engineering, and design spending were obtained separately from Pinck & Co. This information was provided directly by Plainridge Park Casino with the assistance of the MGC and includes spending from both the prior owners of the site, Ourway Realty, and the current owners, Penn National Gaming. The data included the year and amount of spending and the name of the firm that received the money. The UMDI team then found the location and industry sector for each firm to round out the information necessary to input this data into the PI⁺ model.

Preparation of Data for Economic Impact Analysis

The detail and specificity of the data provided by Pinck & Co. allowed the modelers at UMDI 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 construction 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. The averages built into the model are otherwise needed in the absence of precise inputs. As previously noted, detailed methodologies of the PI⁺ model and the data preparation appear in Appendices 1 and 2.

Pre-Construction and Construction Data

This section provides an analysis of direct economic effects resulting from pre-construction and construction activities conducted to build Plainridge Park Casino. The analysis includes a discussion of spending on the project as well as employment and wages paid. These data serve as core inputs for modeling total economic impacts of the project.

Architecture, Engineering, and Design Spending

All construction projects are preceded by site surveys, environmental assessments, and the creation of building plans. In the case of Plainridge Park Casino, these activities amounted to \$13.3 million of spending between Ourway Realty, the prior owners of the site, and Penn National Gaming, the current owners. Some of this money went to firms outside of Massachusetts, though nearly all of it (\$13.2 million) remained in-state. Table 5 shows a gap in spending in 2011 which the team speculates represents a lull in activity during the year between the defeat of a 2010 attempt to legalize commercial casinos with a focus on adding slot machines at racecourses and the eventual signing of the Expanded Gaming Act in late 2011.

Table 5: Architecture, Engineering, and Design Spending by Region

Region	2010	2011	2012	2013	2014
Metro Boston	\$1,587,109	\$0	\$829,751	\$413,303	\$3,898,523
Bristol and Norfolk Counties	\$803,095	\$0	\$1,948,792	\$1,517,836	\$1,724,919
Rest of Western MA	\$74,940	\$0	\$0	\$0	\$0
Rest of Southeastern MA	\$7,000	\$0	\$0	\$0	\$277,846
Lower Pioneer Valley	\$0	\$0	\$0	\$0	\$92,405
Central MA	\$0	\$0	\$0	\$0	\$0
Out-of-state	\$9,781	\$0	\$22,726	\$25,410	\$88,520
Total	\$2,481,925	\$0	\$2,801,268	\$1,956,549	\$6,082,213
MA Total	\$2,472,144	\$0	\$2,778,543	\$1,931,139	\$5,993,692

Source: Pinck & Co.

Construction Spending

Based on the data provided to UMDI, Plainridge Park Casino spent nearly \$115.4 million on the new and renovated structures. This number is smaller than the amount frequently quoted for capital investment¹² because total investment includes the cost of furniture, fixtures, and equipment (FF&E) most of which are not included in the construction budget. Only the cost of items that are permanent or otherwise fixed parts of the structure are included in this analysis.

As is common, construction activities comprised the greatest cost in the total budget, which is categorized by industry in Table 6. These activities include pouring concrete, earthwork and site preparation, hanging drywall, and installing electrical, HVAC, and plumbing systems. When the aggregate industries in Table 6 are further divided into the specific activities of Table 7, insurance and

¹² For example, see MGC website <<http://massgaming.com/about/casinoslots-parlor-development/>>

general bonds¹³ emerges more clearly as a significant component of the budget. These costs were roughly 13 percent of total costs and do not manifest in any on-the-ground activity.

Table 6: Total Spending by Industry

Industry	Total	Percent Spent in MA
Construction	\$91,875,994	87%
Manufacturing Goods	\$15,098,255	100%
Wholesale	\$4,041,560	4%
Insurance and Bonds	\$1,428,153	100%
Other	\$1,343,505	100%
Rental and Leasing	\$879,412	100%
Administration And Waste	\$718,271	0%
Total	\$115,385,150	85%

Source: Pinck & Co.

Table 7: Ten Largest Spending Categories by State

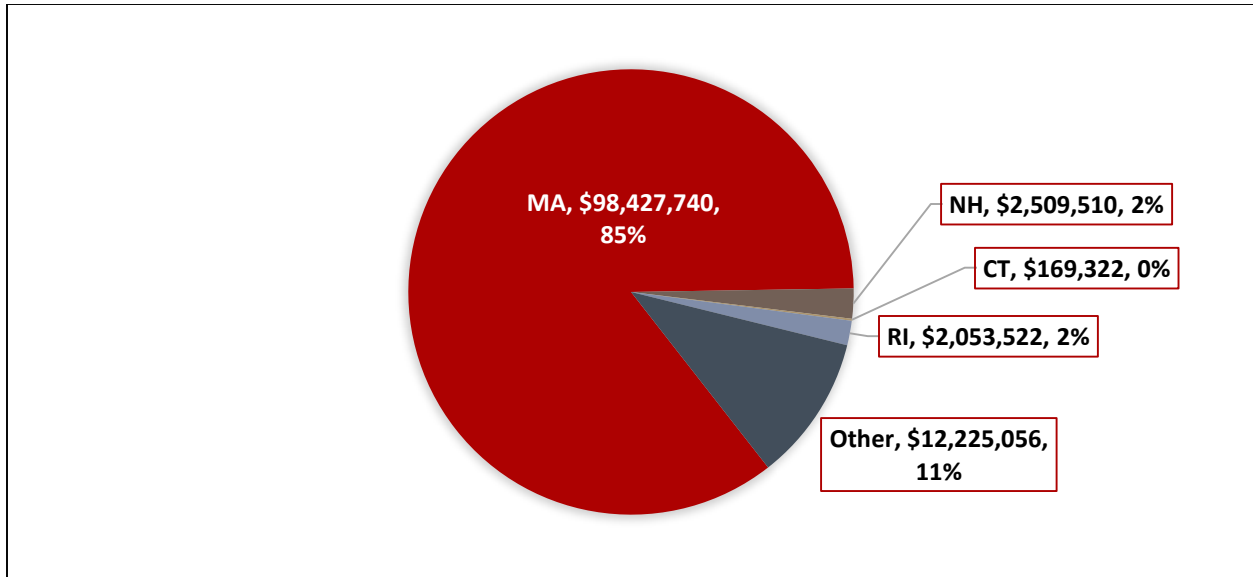
Largest Spending Categories	Total (Mil)	Share
Electrical - MA	\$17.8	15%
General Conditions/ Insurance/ Bonds - MA	\$15.1	13%
HVAC - MA	\$10.2	5%
Earthwork - MA	\$7.4	3%
Pre-Fab Metal Bldg. - MA	\$6.0	3%
Glass & Glazing - MA	\$4.5	2%
Drywall - MA	\$4.3	2%
Plumbing - MA	\$4.0	2%
Kitchen Equipment - FL	\$3.9	2%
Concrete - MA	\$3.5	2%

Source: Pinck & Co.

As Table 7 suggests and Figure 3 confirms, the majority of the spending, 85 percent in fact, went to in-state suppliers while Massachusetts' neighboring states together contributed less than 5 percent of the total. The bulk of the 11 percent of spending that went outside of New England is accounted for by kitchen equipment from Florida and structural steel from Quebec, Canada. It should be noted that the data received by UMDI cannot confirm the location of the "next level" of suppliers. For example, the data shows that \$4.3 million of drywall was purchased from Massachusetts suppliers; however it is unknown where the drywall itself was manufactured. It is likely that there is notable leakage of spending out of the state after purchases from the first level of suppliers.

¹³ In this case, general bonds refer to the performance bonds taken out for nearly all large construction projects. These bonds protect the owner of the property against the contractor's failure to complete the job.

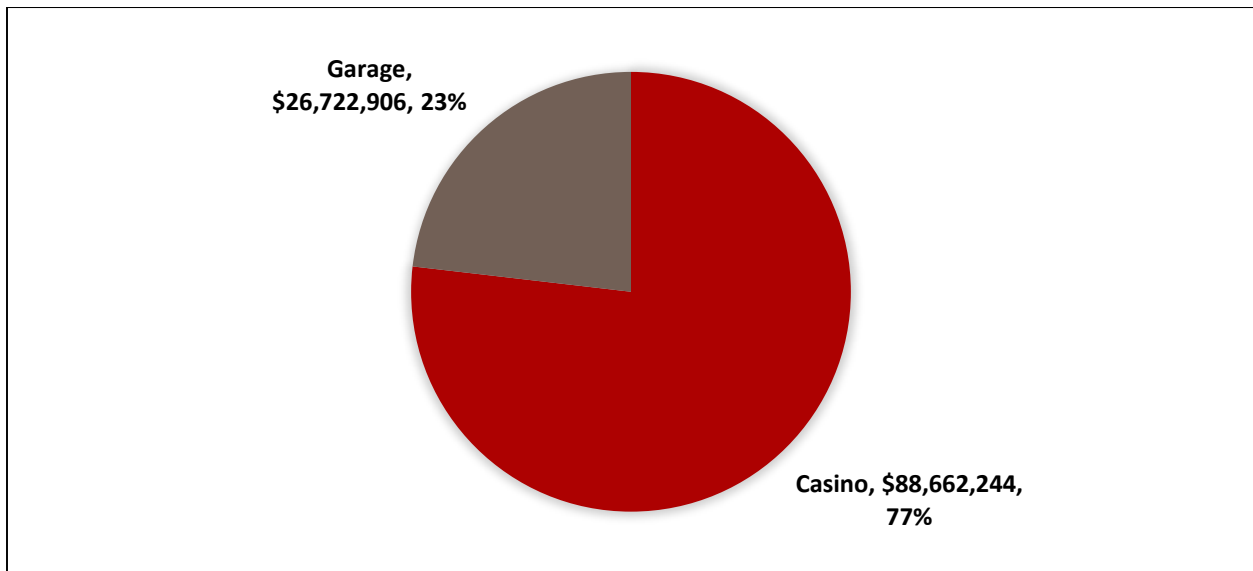
Figure 3: Share of Spending by State



Source: Pinck & Co.

Figure 4 shows that the cost of building the casino and renovating the simulcast building comprised most of the total budget. At over \$88.6 million, these elements represent 77 percent of the total costs. The parking garage cost approximately \$26.7 million and comprised the remaining 23 percent of total spending.

Figure 4: Share of Spending by Structure

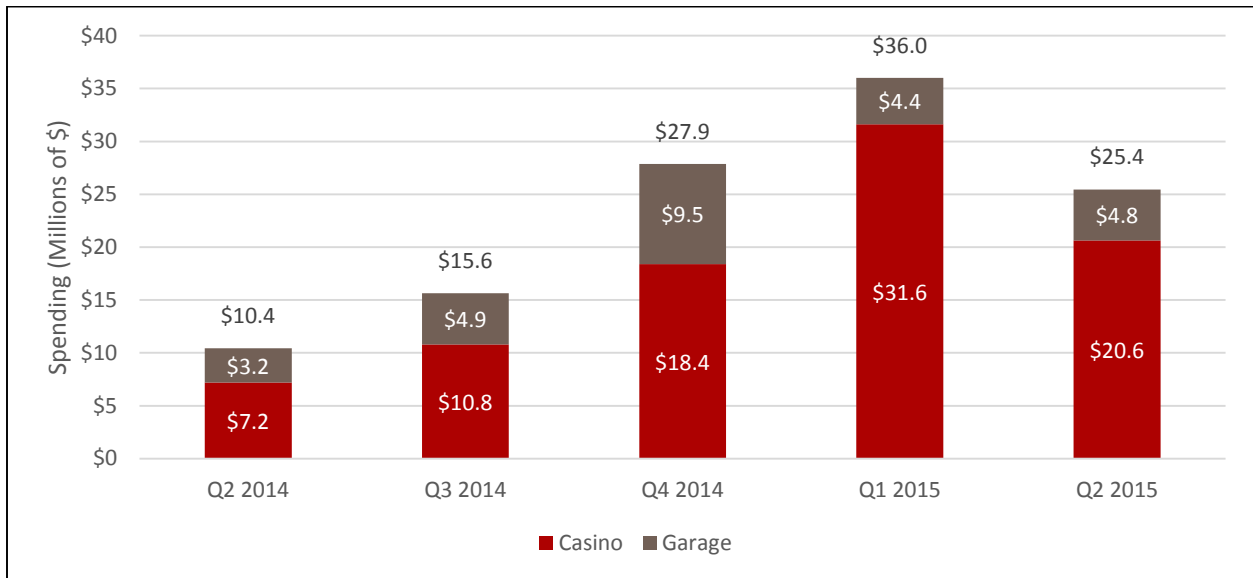


Source: Pinck & Co.

Total outlays, shown in Figure 5, hit their peak in the first quarter of 2015 at \$36 million although spending began in the second quarter of 2014 at \$10.4 million. Q1, 2015 is also the peak spending period for the casino while the previous quarter (Q4, 2014) marked the peak of expenditures for the

garage. At its quarterly peak, casino construction was \$31.6 million while the garage reached its quarterly maximum at \$9.5 million.

Figure 5: Spending by Quarter and Structure



Source: Pinck & Co.

Employment

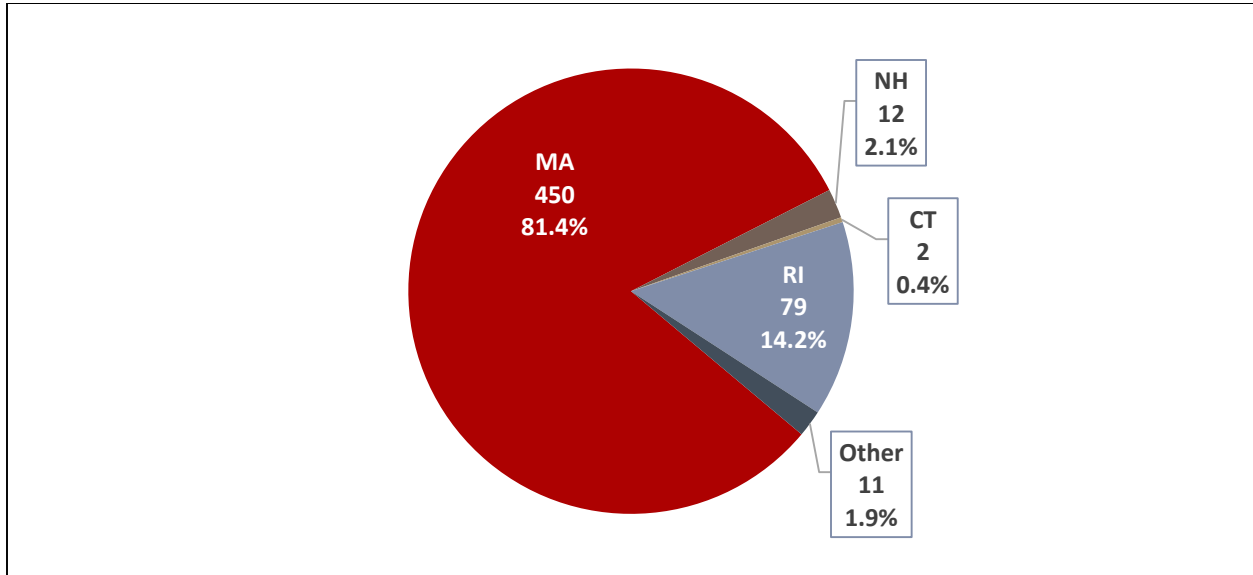
The construction effort at Plainridge Park Casino employed many tradesmen throughout its 14 month duration. However, many of those workers were only onsite for a short period of time. It is therefore important to appropriately interpret the employment numbers provided. Employment on the project is estimated using counts of workers paid each quarter. These data should not be thought of as full time equivalent annual jobs or even quarterly jobs but rather the number of workers who cycled through the site during a particular timeframe, many of whom could have only been there for a few weeks or even days. Indeed, some workers were paid less than \$200 which implies a very short stay onsite. Also, as mentioned under Data Collection in the Methodology section above, employment and wages for the second and third quarters of 2014 could not be separated and are therefore presented together.

The number of workers employed in the construction of Plainridge Park Casino peaked during the final quarter of construction. Employment started at 390 in the second and third quarters of 2014 before jumping to 562, 627, and, finally, 634 in each of the following quarters. The average number of workers onsite was 554 per quarter while the cumulative total of employment across all quarters was 2,213. Again, this total does not represent the total number of employed people but rather the sum of the number of workers onsite at some point in each quarter and almost assuredly counts the same people multiple times. The average across all quarters (554) is better than the cumulative worker totals as a measure of the total employment of the project.

Figure 6 shows the number of workers by state of residence. From the chart, it is clear that the majority of the construction workers employed were from Massachusetts. In fact, on average over the course of construction, 82 percent of workers were Massachusetts-based despite the proximity of Rhode Island and its flagging construction sector, where employment is roughly 30 percent below its pre-recession

peak in 2006.¹⁴ That being said, Rhode Islanders did make up the next largest group of workers with 14 percent of the average. New Hampshire, Connecticut, and all other states combined provided an average of roughly 5 percent of workers.

Figure 6: Number of Construction Workers by State of Residence and Share of Total from Quarterly Averages

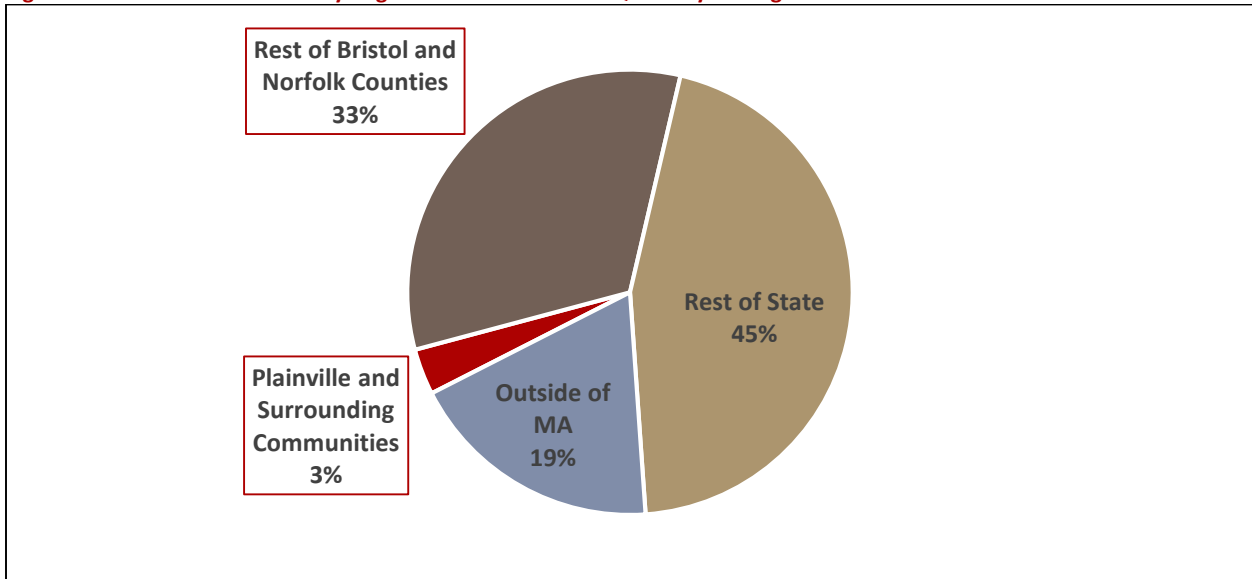


Source: Pinck & Co.

When it comes to geographic distribution within Massachusetts, workers were divided nearly equally between Bristol and Norfolk Counties (the immediate region) and the rest of the Commonwealth. Among all workers, 33% resided in Bristol and Norfolk counties, 45% in the rest of Massachusetts, and the remainder elsewhere. Within the immediate region, only a small share of workers was from the Town of Plainville or its MGC-designated surrounding communities. These workers represent 3% of all construction workers. Out of the average of 554 workers, 19 were from Plainville and its surrounding communities, 432 from elsewhere in Massachusetts, and 103 from outside the Commonwealth. Figure 7 shows the distribution of workers by region and Figure 8 and Figure 9 show total and average worker numbers, respectively. A map provided in Appendix 3 shows detailed worker distributions by town.

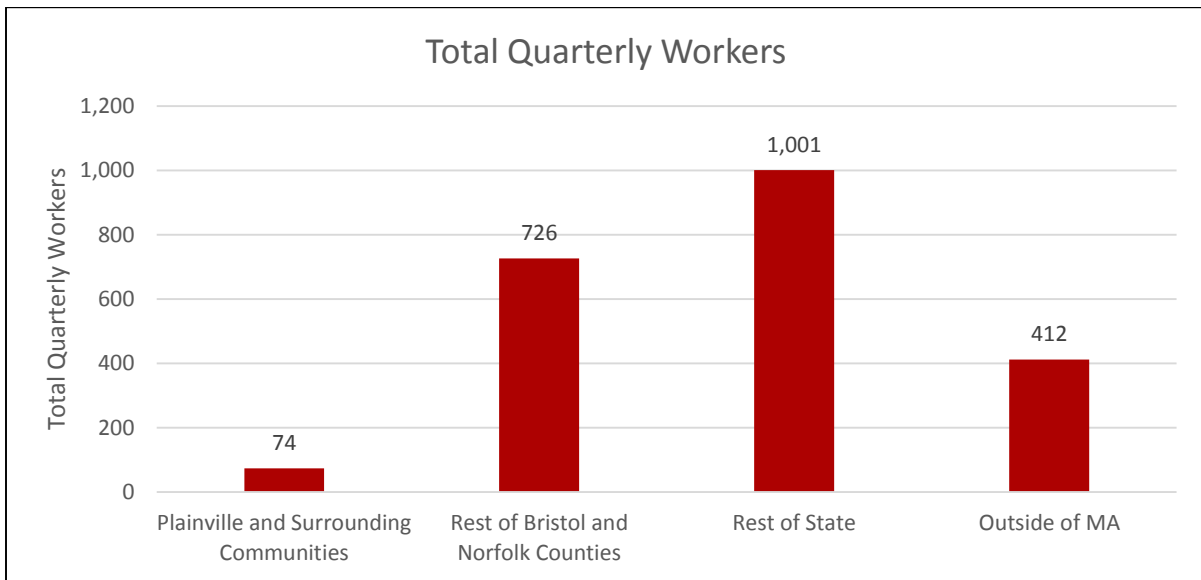
¹⁴ QCEW private-sector construction employment, all establishments, annual average, 2001 – 2014.

Figure 7: Construction Workers by Region of Residence from Quarterly Averages



Source: Pinck & Co.

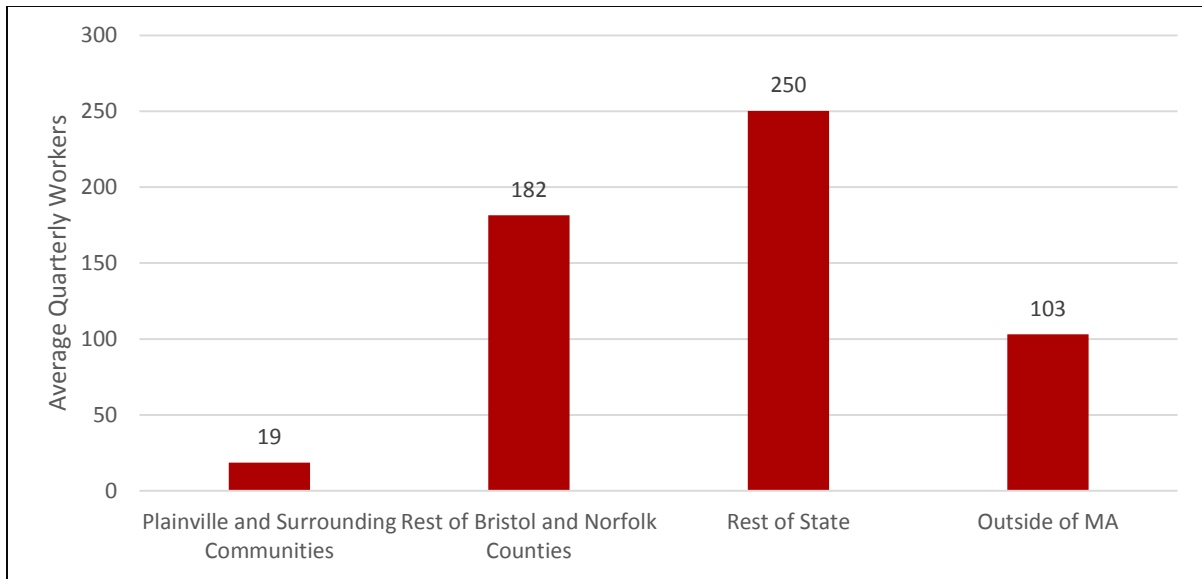
Figure 8: Construction Workers by Region of Residence, Total of Quarterly Counts



Source: Pinck & Co.

Note: These totals represent the cumulative sum of the number of workers onsite at some point during each quarter and likely count the same people multiple times.

Figure 9: Construction Workers by Region of Residence, Average of Quarterly Counts



Source: Pinck & Co.

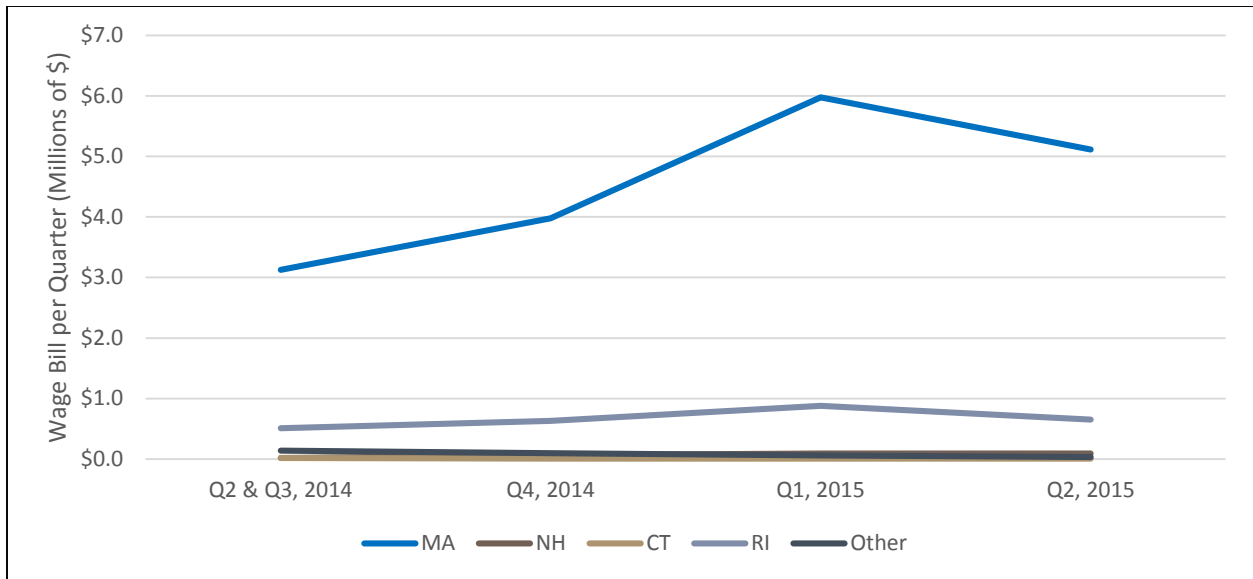
Note: These totals represent the average number of workers onsite at some point each quarter.

Wages

Unlike employment, wages can be summed over time to show cumulative dollars. Therefore, the totals that follow show the actual sums of money paid to workers over the course of the construction effort. However, when pairing these wages with employment, for example to show average wages, the same care should be taken in the interpretation of employment as described in the beginning of the Employment section above.

Not surprisingly, the geographic distribution of wages is largely similar to that of the workers who earned them though there are some notable differences. As shown in Figure 10 on page 19, while the peak quarter of employment was the second quarter of 2015, wages peaked one quarter earlier indicating that workers in Q2, 2015 worked fewer hours and/or were paid less on an hourly basis. In the second and third quarters of 2014, \$3.8 million in wages was paid. Wages rose to \$7 million in Q1, 2015 and fell to \$5.9 million in Q2, 2015. Wages were distributed similarly to employment across regions. The bulk of the wages paid went to Massachusetts residents and a large proportion of those wages were paid to workers living within Bristol and Norfolk Counties.

Figure 10: Total Wage Bill by State of Residence and Quarter



Source: Pinck & Co.

Over the 14 months of construction a total of \$21.5 million in wages was paid to workers. Of the total, \$18.2 million, or 85 percent, was paid to residents of Massachusetts. Most of the remainder (\$2.7 million or 13 percent) went to Rhode Islanders. Residents of Bristol and Norfolk Counties received 40 percent of all wages with 5 percent, or \$1.1 million, staying in the Town of Plainville and its surrounding communities and 34 percent, or \$7.4 million, going to the rest of Bristol and Norfolk Counties.

Table 8 shows that the distribution of wages among regions differed slightly from the distribution of employment and that Plainville and the surrounding communities received a higher share of wages than employment. These differences suggest that average wages per worker differ across regions.

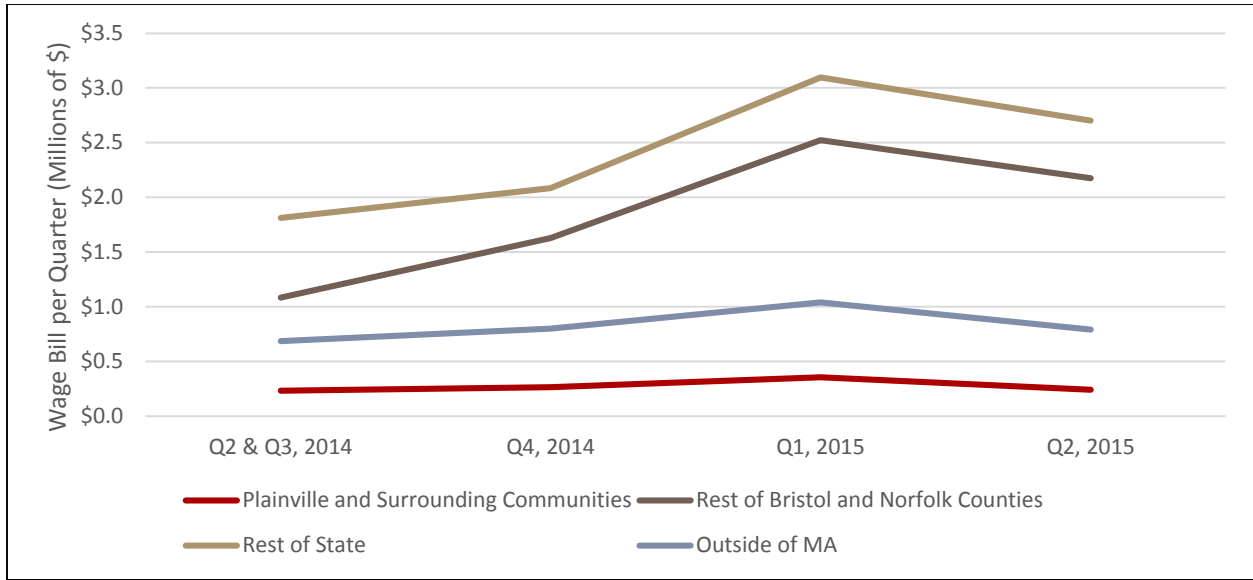
Table 8: Comparison of Average Share of Wages and Workers by Region of Residence

Region	Share of Wages	Share of Workers	Difference
Plainville and Surrounding Communities	5%	3%	2%
Rest of Bristol and Norfolk Counties	34%	33%	2%
Rest of State	45%	45%	0%
Outside of MA	15%	19%	-3%

Source: Pinck & Co.

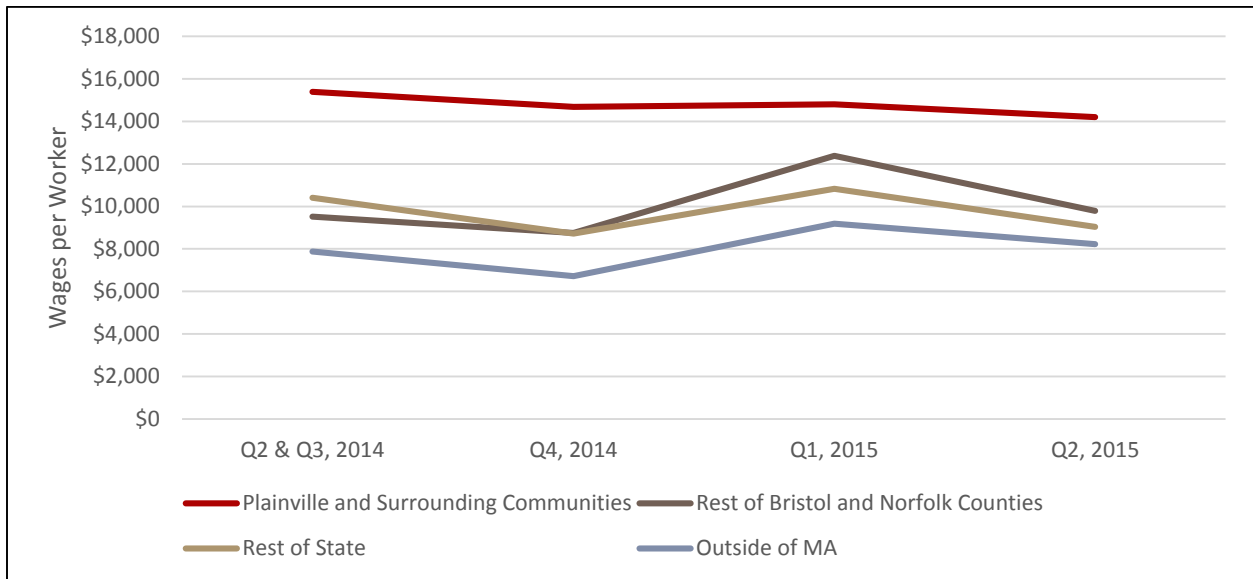
Table 8 does not tell the whole story. The reason that the Rest of State and Rest of Bristol and Norfolk Counties have the highest share of wages is because they are home to the majority of the construction workers (see Figure 9 on page 18). However, when looking at wages per worker (see Figure 12), Plainville and the surrounding communities have the highest average. At \$14,750 per worker, the average wage paid to workers from the local area is over 50% higher than the project average of \$9,717 and 45% higher than the next highest average wage of \$10,206 paid to the residents of the other cities and towns of Bristol and Norfolk Counties. However, it is worth noting the data do not indicate whether the higher average earnings are due to local residents holding higher paying jobs and/or working more hours.

Figure 11: Total Wage Bill by Region of Residence and Quarter



Source: Pinck & Co.

Figure 12: Average Wages Earned per Worker by Region of Residence and Quarter



Source: Pinck & Co.

Economic Impacts of Pre-Construction and Construction Spending

While the previous section discussed spending, employment, and wages related to the project, this section shows how these direct effects generated additional economic effects within the Massachusetts economy. Using the data presented in the preceding sections and the PI⁺ model describe in detail in Appendix 1, the research team at UMDI produced the economic impact estimates presented on the following pages.

Impacts of Architecture, Engineering and Design Spending

Preconstruction expenditures occur over many years, beginning in 2010 and ending in 2014. As more fully explained in Appendix 2, due to a limitation in the economic model, the first simulation year available to the team is 2014. Therefore, the spending over time was adjusted for annual inflation and combined for a single year in 2014. Thus the impacts shown in Table 9 should be interpreted as the summation of changes induced by preconstruction spending that occurred over five years rather than impacts in 2014 alone.

Once adjusted for inflation, pre-construction spending on architecture, engineering, and design totaled \$13.6 million over the five year period ending in 2014 (the unadjusted total was \$13.3 million). Of that amount, direct spending to Massachusetts-based businesses totaled \$13.2 million, or 99 percent. This direct spending resulted in a change of total output of \$24.3 million and a multiplier of 1.84. The new business activity created demand for 170 jobs over the five years and increased personal income in Massachusetts by \$12.5 million. Net new economic activity in Massachusetts (also known as value added or gross state product) totaled \$16.7 million. The difference between output and value added is the cost of goods and services used in production, otherwise known as intermediate inputs. Because value added removes the double-counting inherent in the calculation of output, it is the preferred metric when summarizing the economic contribution of an event.

The data show that architecture, engineering, and design spending was heavily concentrated in two regions. Together, Bristol and Norfolk Counties and Metro Boston received 95 percent of direct spending. Once this spending cycled through the economy, the impacts were distributed slightly more widely. However, these two main regions still received 89 percent of new jobs, 84 percent of the income, and 92 percent of economic value added.

Table 9: Total Economic Impacts of Architecture, Engineering, and Design Spending, Jobs in Units, Dollars in Millions

Category	Employment	Output	Value Added	Personal Income
Bristol and Norfolk Counties	76	\$9.7	\$6.8	\$4.7
Metro Boston	75	\$12.5	\$8.5	\$5.8
Rest of Southeastern MA	12	\$1.3	\$0.9	\$1.3
Central MA	3	\$0.4	\$0.2	\$0.5
Lower Pioneer Valley	2	\$0.2	\$0.1	\$0.1
Rest of Western MA	1	\$0.1	\$0.1	\$0.1
Total	170	\$24.3	\$16.7	\$12.5

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

Impacts of Construction Spending

All told, construction of Plainridge Park Casino created 576 jobs in Massachusetts in 2014 and 540 jobs in 2015. These totals, shown in Table 10, include employees directly hired to work on the construction of Plainridge Park, as well as individuals hired at downstream suppliers (business-to-business or indirect jobs). An example of a new indirect job is one that is created at the firm installing the plumbing fixtures for the new buildings. The table also includes jobs created by these newly-employed workers spending their wages in their home communities (induced jobs). An example of an induced job would include those created at restaurants frequented by new direct and indirect employees.

Table 10: Direct, Indirect, and Induced Jobs from Plainridge Park Construction

Total Employment	2014	2015	Total
Direct	267	234	500
Business to Business (Indirect)	59	49	108
Induced	251	258	509
<i>Consumption-Based</i>	128	127	255
<i>Other Induced</i>	123	132	255
Total	576	540	1,117

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

As outlined in Table 11 below, most of the new employment occurred within Bristol and Norfolk Counties, with a considerable number of jobs created in Metro Boston and the rest of Southeastern Massachusetts.¹⁵ Fewer jobs were created in the more distant Western and Central parts of the state. It should also be noted that the construction of the casino almost certainly led to some new economic activity in other states, particularly in nearby Rhode Island although the Massachusetts-specific REMI model used for this analysis was not designed to capture any of this out-of-state activity.

Table 11: Employment Impact of Plainridge Park Construction by Massachusetts Region

Total Employment	2014	2015
Bristol and Norfolk Counties	400	355
Rest of Southeastern MA	53	61
Metro Boston	102	102
Central MA	18	20
Lower Pioneer Valley	2	2
Rest of Western MA	0	0
Total	576	540

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

Over three-quarters of the new jobs resulting from building Plainridge Park were in the construction sector. Most of these were individuals either directly employed in the construction or contractors brought in for specific parts of the project, although the new spending created by these workers also led to new construction through marginal increases in the demand for other commercial and residential structures. The rest of the jobs are distributed among sectors supplying goods and services to the

¹⁵ The definition of the regions appears in Appendix 2.

construction project (Finance and Insurance, Real Estate, Manufacturing) and jobs created by the expenditure of new personal income (Retail, Health Care, Accommodation and Food Services). While almost all of the construction jobs were located near Plainville, other parts of Massachusetts get a larger share of employment in a number of other industries.

Table 12: Employment Changes in the Top Ten Impacted Sectors

Employment Impact by Industry Sector	Bristol and Norfolk Counties		Rest of MA	
	2014	2015	2014	2015
Construction	282	256	34	40
Retail Trade	22	19	19	21
Health Care and Social Assistance	16	14	21	22
Other Services, except Public Administration	10	8	14	14
Finance and Insurance	11	8	18	14
Accommodation and Food Services	8	8	11	12
Administrative and Waste Management Services	5	8	8	12
Real Estate and Rental and Leasing	4	5	7	8
Wholesale Trade	4	2	4	4
Professional, Scientific, and Technical Services	6	2	11	9

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

Massachusetts-based construction workers received \$7.1 million in wages in 2014 and \$11.1 million in 2015. These direct wages were part of the larger increase in total personal income in Massachusetts shown in Table 13, where the values include both the direct wages and indirect and induced personal income from other sources. In all, residents of Massachusetts earned additional income of \$43.5 million in 2014 and \$48 million in 2015. This new income flowed to the regions of Massachusetts in a manner similar to the proportion of jobs; however, in the case of personal income, Bristol and Norfolk Counties' share of the total was slightly lower and Metro Boston's share was slightly higher. This may be because businesses in Bristol and Norfolk Counties generally purchase many of their necessary goods and services from other businesses in the Metro Boston region, and the average wages in that region are considerably higher than those of other parts of Massachusetts. As in the employment analysis, these totals do not include the new income earned by out-of-state residents.

Table 13: Personal Income Impact by Region, Millions of Dollars

Personal Income	2014	2015
Bristol and Norfolk Counties	\$23.7	\$24.1
Rest of Southeastern MA	\$6.7	\$8.6
Metro Boston	\$10.3	\$11.8
Central MA	\$2.6	\$3.3
Lower Pioneer Valley	\$0.1	\$0.1
Rest of Western MA	\$0.0	\$0.0
Total	\$43.5	\$48.0

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

The construction of the Plainridge Park casino generated \$85.7 million and \$80 million of business activity (often referred to as output) in 2014 and 2015, respectively. Direct output represents the construction spending remaining in Massachusetts. Comparing Table 14 to Table 6 shows that about one-third of the construction dollars left the state (\$67.8 million compared to \$91.9 million). However, once the indirect and induced activity is taken into account, the total budget of \$115 million creates \$165.6 million of output for a multiplier of 1.44. Of total output, \$105.4 million in net new economic activity (also known as value added) was created, including \$52.7 million in 2014 and \$52.4 million in 2015. Almost two-thirds of the economic activity generated by the construction occurred in Bristol and Norfolk Counties, while a further one quarter occurred in Metro Boston.

Table 14: Direct, Indirect, and Induced Output, Millions of Dollars

Total Output	2014	2015	Total
Direct	\$35.5	\$32.3	\$67.8
Business to Business (Indirect)	\$13.5	\$10.2	\$23.7
Induced	\$36.6	\$37.4	\$74.0
<i>Consumption-Based</i>	\$16.6	\$16.7	\$33.3
<i>Other Induced</i>	\$20.1	\$20.7	\$40.7
Total	\$85.7	\$80.0	\$165.6

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

Table 15: New Economic Impact by Region, Millions of Dollars

Economic Activity	Total (Output)		Net New (Value Added)	
	2014	2015	2014	2015
Bristol and Norfolk Counties	\$54.4	\$48.3	\$33.2	\$32.4
Rest of Southeastern MA	\$6.2	\$7.2	\$3.9	\$4.6
Metro Boston	\$22.3	\$21.6	\$14.0	\$13.7
Central MA	\$2.3	\$2.5	\$1.4	\$1.5
Lower Pioneer Valley	\$0.3	\$0.3	\$0.2	\$0.2
Rest of Western MA	\$0.1	\$0.1	\$0.0	\$0.0
Total	\$85.7	\$80.0	\$52.7	\$52.4

Source: Regional Economic Models, Inc. as calculated by the University of Massachusetts Donahue Institute.

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 13 and Figure 14.

Figure 13: REMI Model Linkages

REMI Model Linkages (Excluding Economic Geography Linkages)

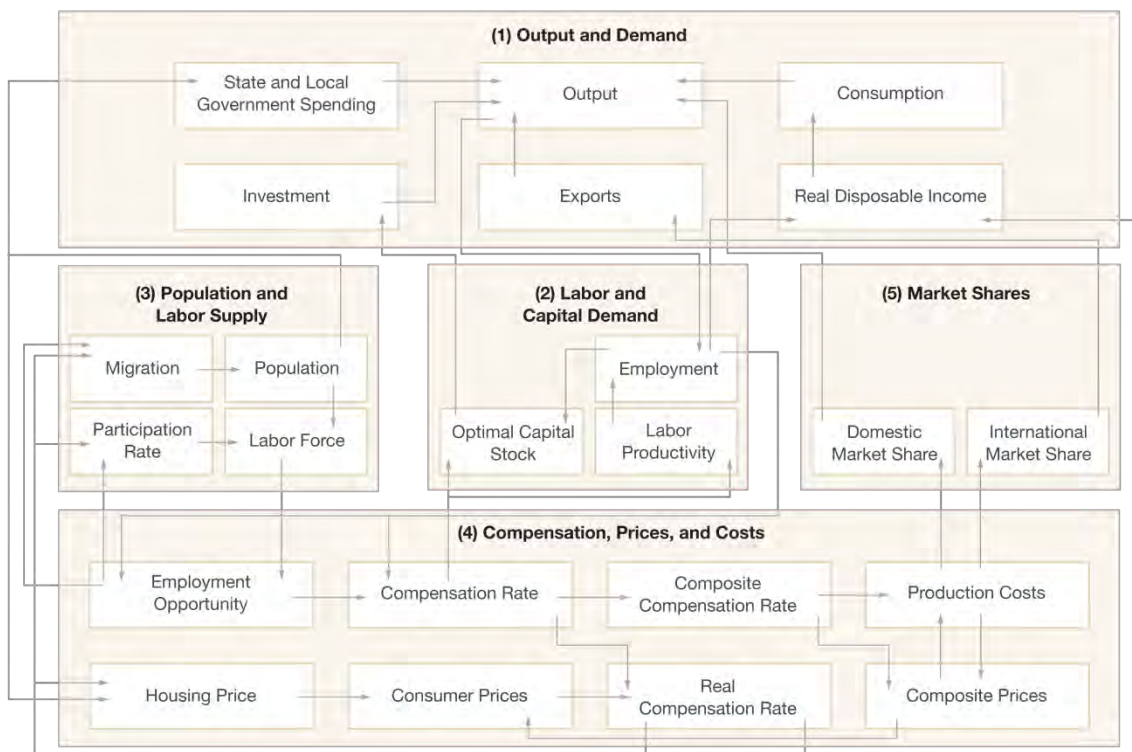
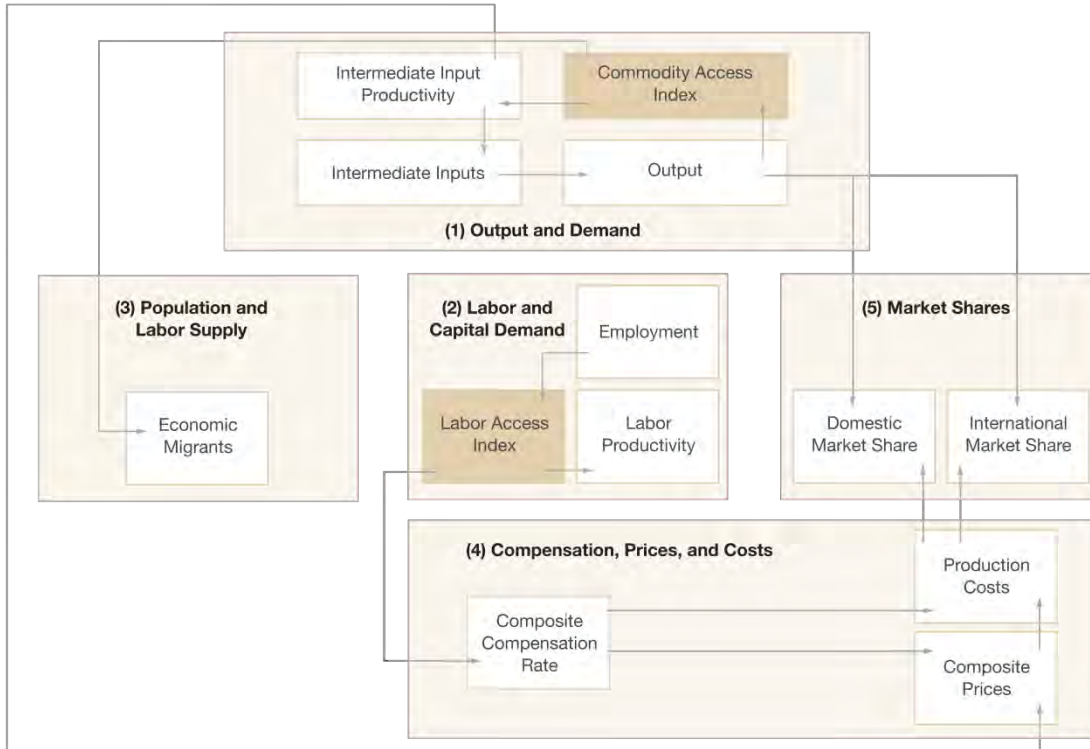


Figure 14: Economic Geography Linkages



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.

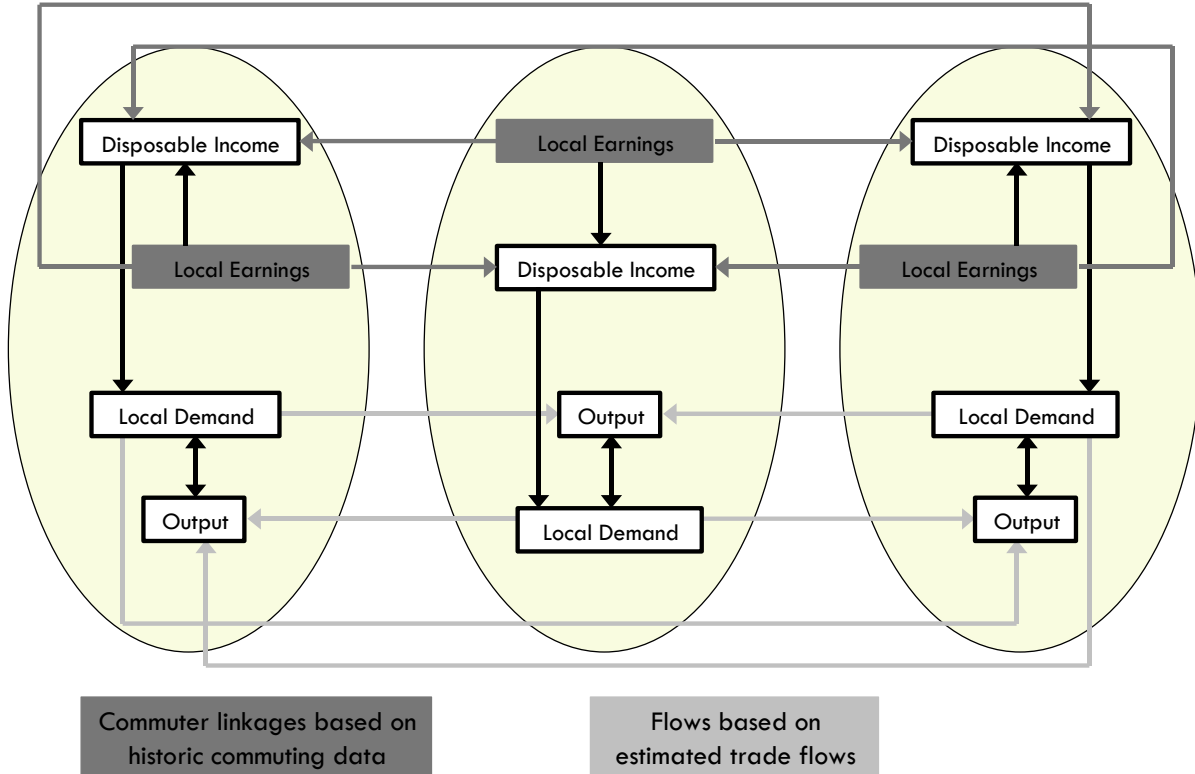
Models can be built as single region, multi-region, or multi-region national models. A region is defined broadly as a sub-national area, and could consist of a state, province, county, or city, or any combination of sub-national areas.

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 15.

Figure 15: 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

As detailed in the Data Collection section, Pinck & Co. provided UMDI with quarterly files containing the number of employees and total payroll by zip code, as well as the amount spent on vendors by each 6-digit North American Industry Classification System (NAICS) code and the primary location of that vendor (by state). In order to transform this data into information that could be entered into the REMI model, a few steps needed to be taken. For a visual representation of this process, see Figure 17 on page 32.

The first step in this process was to convert the geographic and industry concepts used by Pinck into those recognized by REMI's PI⁺ model. The model purchased by SEIGMA includes 6 regions and 70 sectors. Each of the 6 regions in the model is built from Massachusetts counties, and the 70 industry sectors roughly correspond to 3-digit NAICS codes. UMDI built tools to aggregate the more granular Pinck data into the regions represented in the PI⁺ model.

Once wages and employment were aggregated to the level of the model's regions, wages were ready to be entered. Wages were used rather than employment because an analysis of the data made it clear that many of the workers hired to work on Plainridge Park Casino did not work for the entirety of the quarter. This was clear because the average quarterly wages for some zip codes were only a few hundred dollars. Since the REMI concept of employment represents job-years (e.g. a worker who works for only 6 months is considered half of a job by REMI), an estimate of total construction employment in terms of job-years was made by dividing the total wage bill for construction in each year by the average annual wage for construction workers in the Plainville region for that year. The result of the calculation showed that roughly every 4.5 workers represent one job-year.

With the employment data broken out by zip code, UMDI was able to determine the precise number of commuters coming in from each model region, as well as from out of state. In the absence of this information, the PI⁺ model would use its own assumptions about commuter flows to estimate the residence of construction employees. UMDI made adjustments to the flow of commuter earnings by taking the difference between the model's assumptions and the data gathered by Pinck & Co.

When wages are entered into the PI⁺ model, assumptions about employment and intermediate inputs associated with that level of economic activity are made by the model. Since UMDI was provided with much more detailed information regarding intermediate inputs, the model's assumptions needed to be nullified. There is a feature in PI⁺ to do this, but it is based on employment levels, not wages. The employment levels calculated above based on average annual wages were used for this purpose.

Another concept in the model that needed to be adjusted was value added, which is calculated as a firm or industry's total output minus the cost of all its intermediate inputs. Calculating the value added of Plainridge Park construction first required calculating the output of the project. This was accomplished by multiplying the job-years calculated above by the average labor productivity for the construction sector in Bristol and Norfolk Counties for each year of the construction project, as found in the PI⁺ model's baseline forecast. The total cost of intermediate inputs (spending by industry except for those industries classified as construction, see below for more information) were subtracted from the

calculated output to determine actual value added. The difference between this value and the number which would have been calculated within PI⁺ (which was slightly lower) was entered into the model.

The vendor spending data provided by Pinck was provided at a very detailed industry level but only at a state level for geography. In order to share out this new demand for goods and services by REMI region, the spending was shared out based on the REMI model's assumptions on trade flows. In other words, if businesses in Bristol and Norfolk Counties generally buy a certain proportion of their goods and services from another region, UMDI assumed that they would purchase the same share of the total vendor spending on that industry from that region.

For most of the industries, this spending was captured in PI⁺ using the intermediate demand variable, which increases wages and employment in the associated region and industry, but does not increase final output in any industry, since the good is part of another industry's output.

Two exceptions were made to this method. One was for the vendor spending on other construction firms. These firms were not so much providing goods or services to the prime contractor as performing construction services on behalf of the contractor, and it was determined that the most sensible way to capture this distinction was to model this spending as exogenous final demand for construction. In the second case a small share of the vendor spending reflected the cost of various permits within the Town of Plainville. UMDI made the assumption that the increased revenue from permits to the Town of Plainville would be somehow spent by the town in the same year, and this money was modeled as an increase in local government spending in Bristol and Norfolk Counties.

UMDI also estimated the economic impact of the architecture, engineering, and design work that took place prior to the construction of Plainridge Park. Data on this activity was provided to the team directly by Plainridge Park Casino, with the help of the MGC, and includes spending by Penn National Gaming, Plainridge Park's current owners, as well as the previous owners, Ourway Realty. The data, which went as far back as 2010, gave the amount spent on each vendor prior to the construction phase of the project. UMDI took the vendor list and assigned a region and a NAICS code to each firm, with nearly all of the spending occurring in the Professional and Technical Services NAICS code. In contrast to the construction phase data, the pre-construction data provided for this analysis did not include employment and wage information.

When the preconstruction data were run in the PI⁺ model, all of the spending was treated as having occurred in a single year, 2014. The reason for this is that the PI⁺ model includes data from past years to inform its future projections. Once a year has been included in the model's history, it is no longer available for simulations. In other words, the model will not allow for changes to the past. Because there is a two-year lag before all the data necessary for the construction of historical years in the model become available, 2014 was the first forecast year available in UMDI's PI⁺ model. Facing this constraint, UMDI opted to run all the economic activity in a single year by first converting the spending in each year from 2010 to 2014 into 2014 dollars and then running the five-year total in 2014. The results were then presented as representative of the total activity occurring over the five-year preconstruction phase rather for 2014 alone.

Table 16: PI+ Model Regions

Region	County
Lower Pioneer Valley	Hampden
	Hampshire
Bristol and Norfolk Counties	Bristol
	Norfolk
Metro Boston	Essex
	Middlesex
	Suffolk
Rest of Western MA	Berkshire
	Franklin
Central MA	Worcester
Rest of Southeastern MA	Barnstable
	Dukes
	Nantucket
	Plymouth

Figure 16: PI+ Model Regions

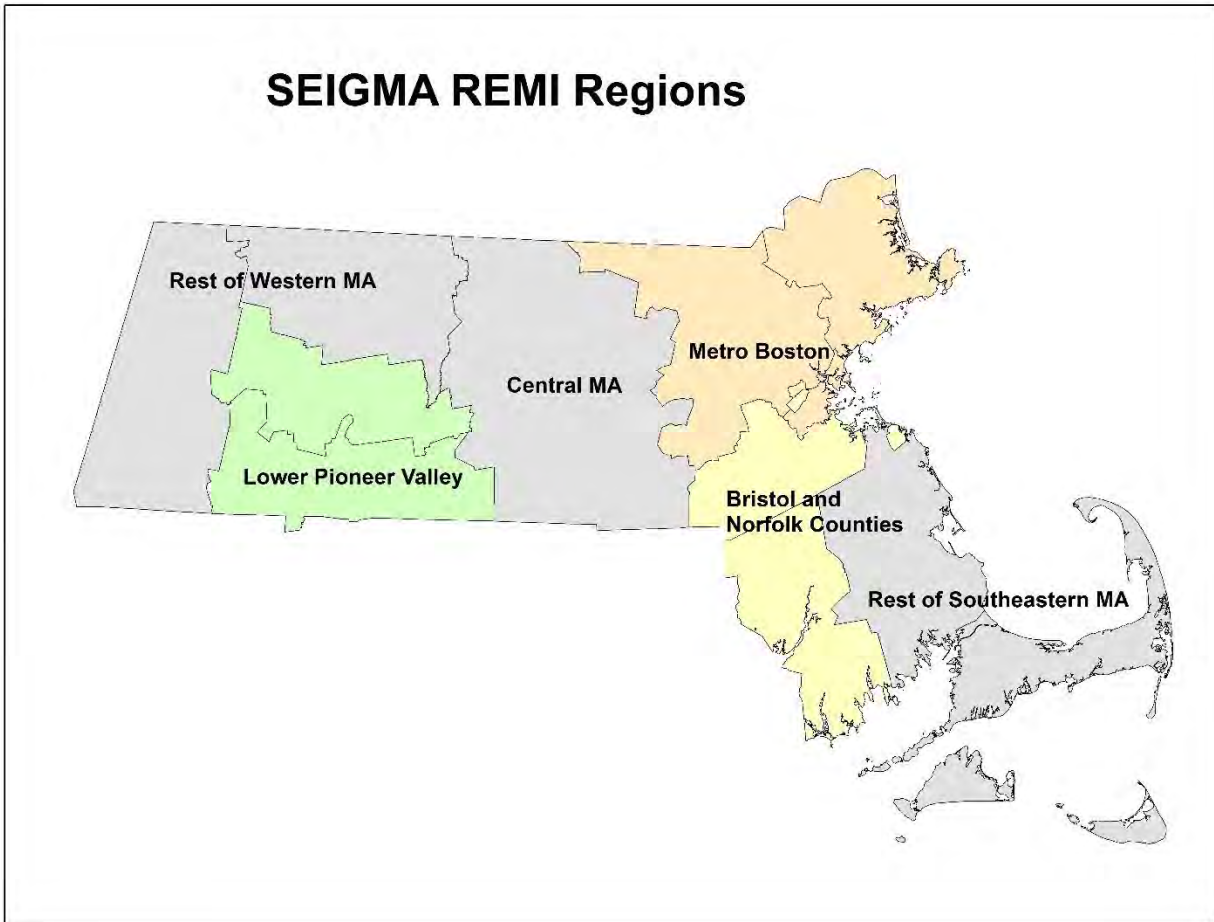
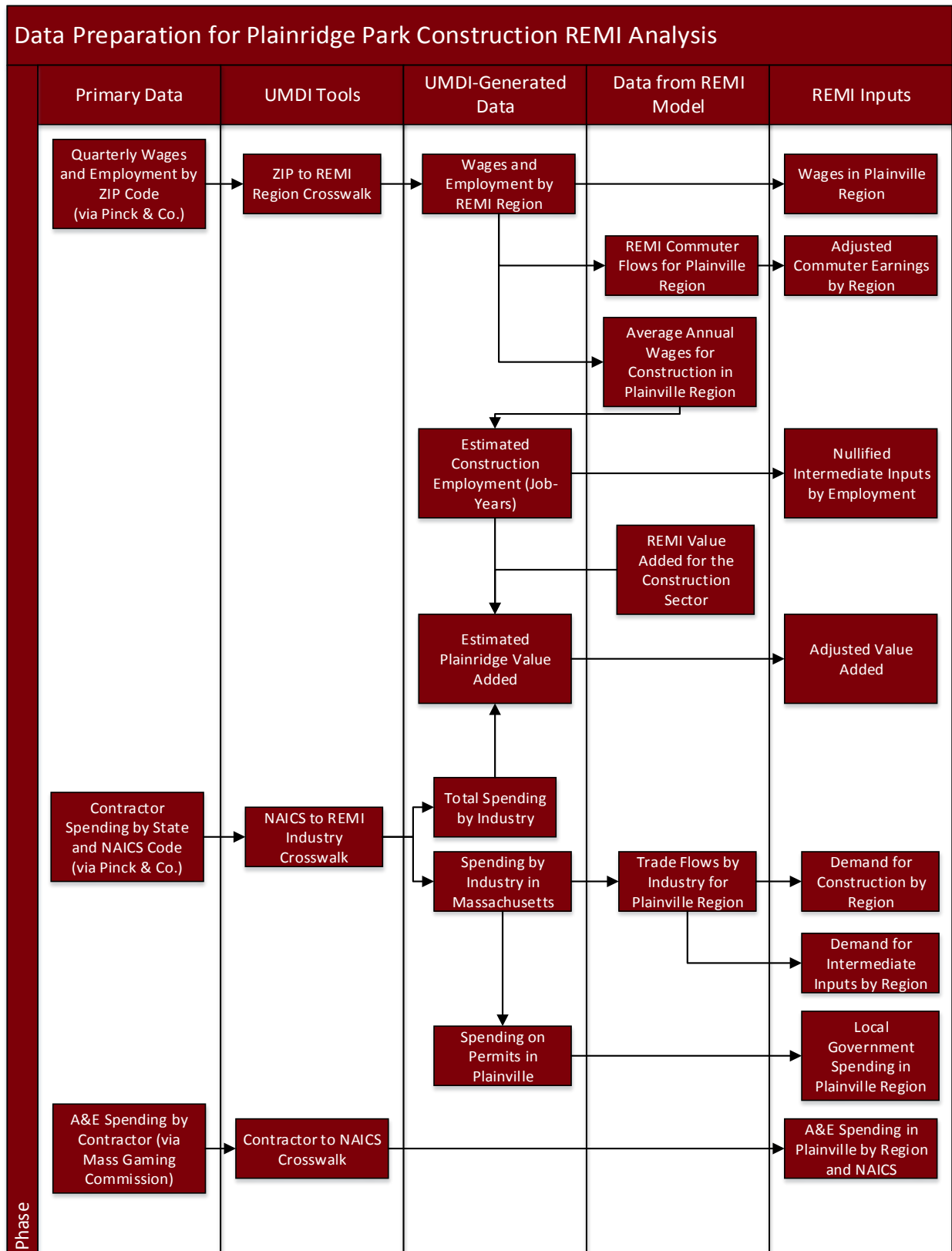
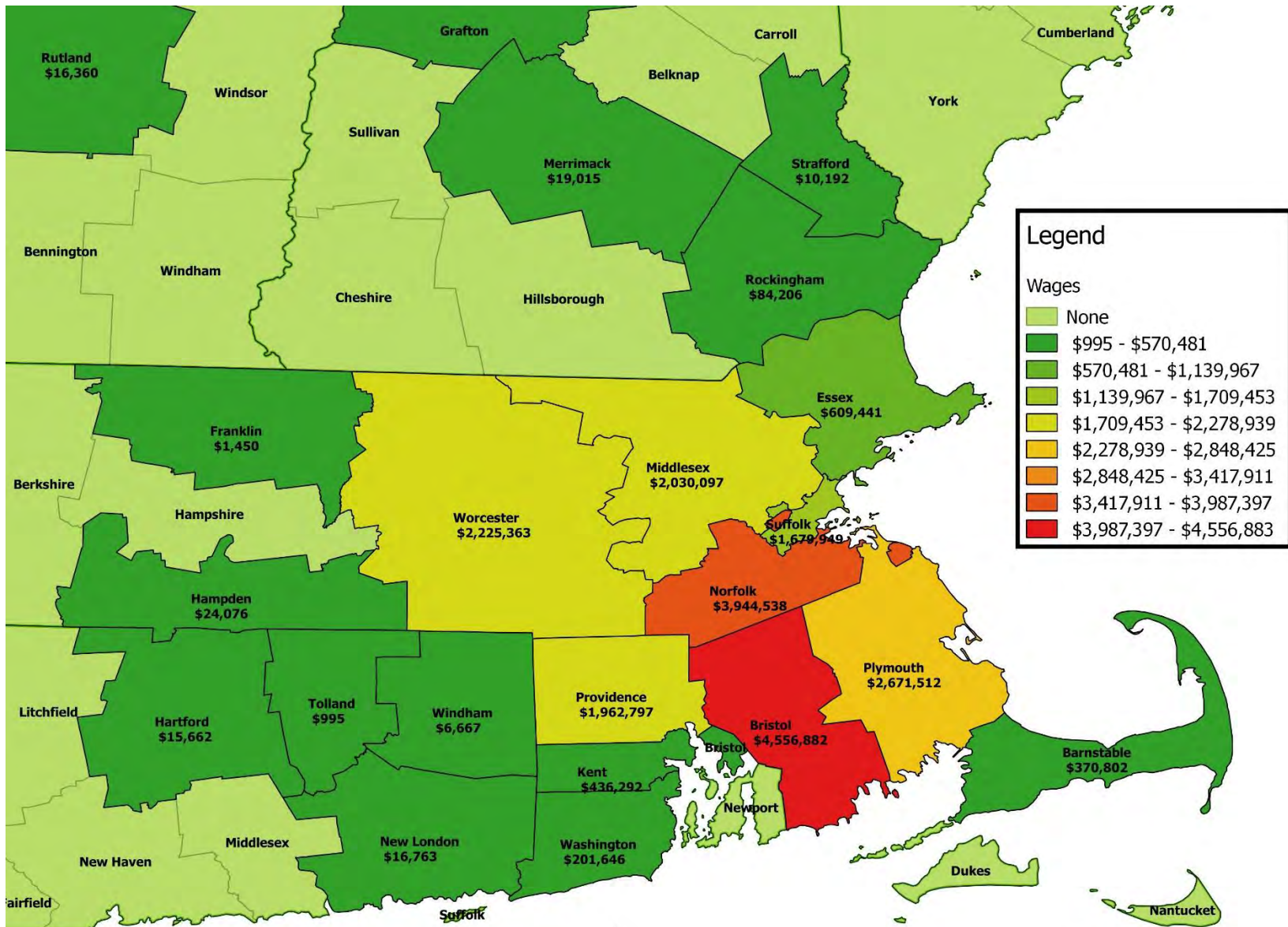


Figure 17: Pinck & Co. Data Preparation



Appendix 3: Maps of Wages

Figure 18: Construction Wages by County



The Construction of Plainridge Park Casino

Presented by Rod Motamedi
Research Manager
Economic and Public Policy Research
UMass Donahue Institute

Plainridge Park Project Background

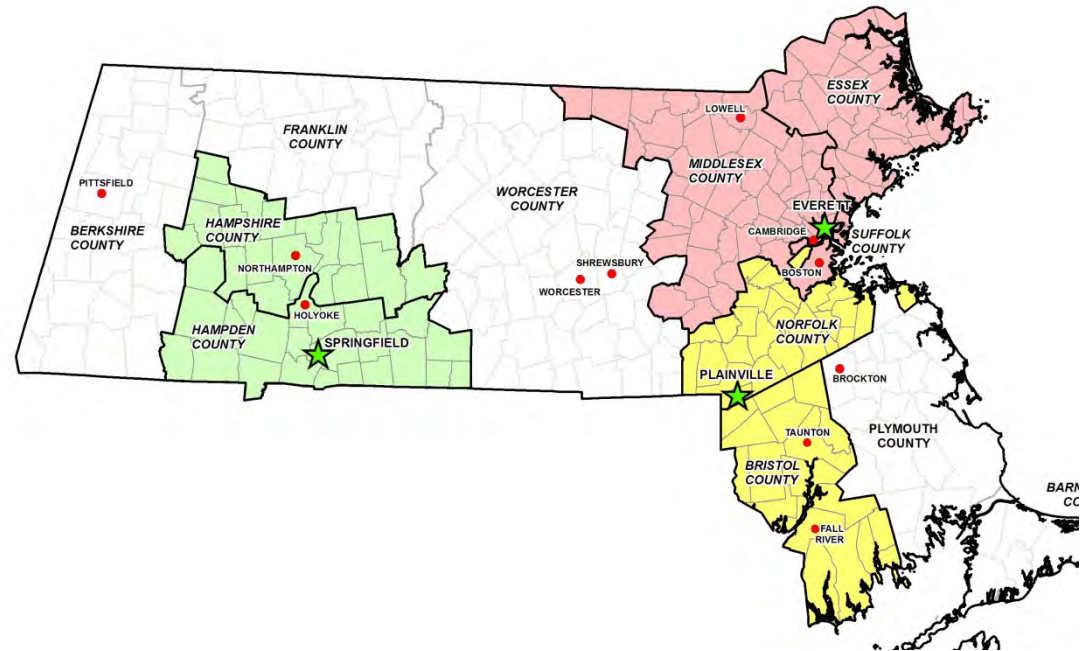
- Property includes four main structures: racetrack, grandstand and simulcast building, casino, and parking garage.
- The track carried over, the grandstand was remodeled, and the casino and parking garage are new.
- Preconstruction spending on architecture, design, and engineering was roughly \$13 million over five years.
- Construction took approximately 14 months and cost \$115 million.

Data Collection and Preparation

- Collected data with the help of Pinck & Co, the MGC, and Plainridge Park Casino
 - The cooperation of the casino and its general contractor was crucial in getting quality data.
- Data included information on both preconstruction and construction.
- The employment, wages, and spending data was cleaned and entered into a PI⁺ model from Regional Economic Models, Inc. (REMI) to produce the economic impacts.
- Because each phase occurs over a different span of time, they were modeled separately.

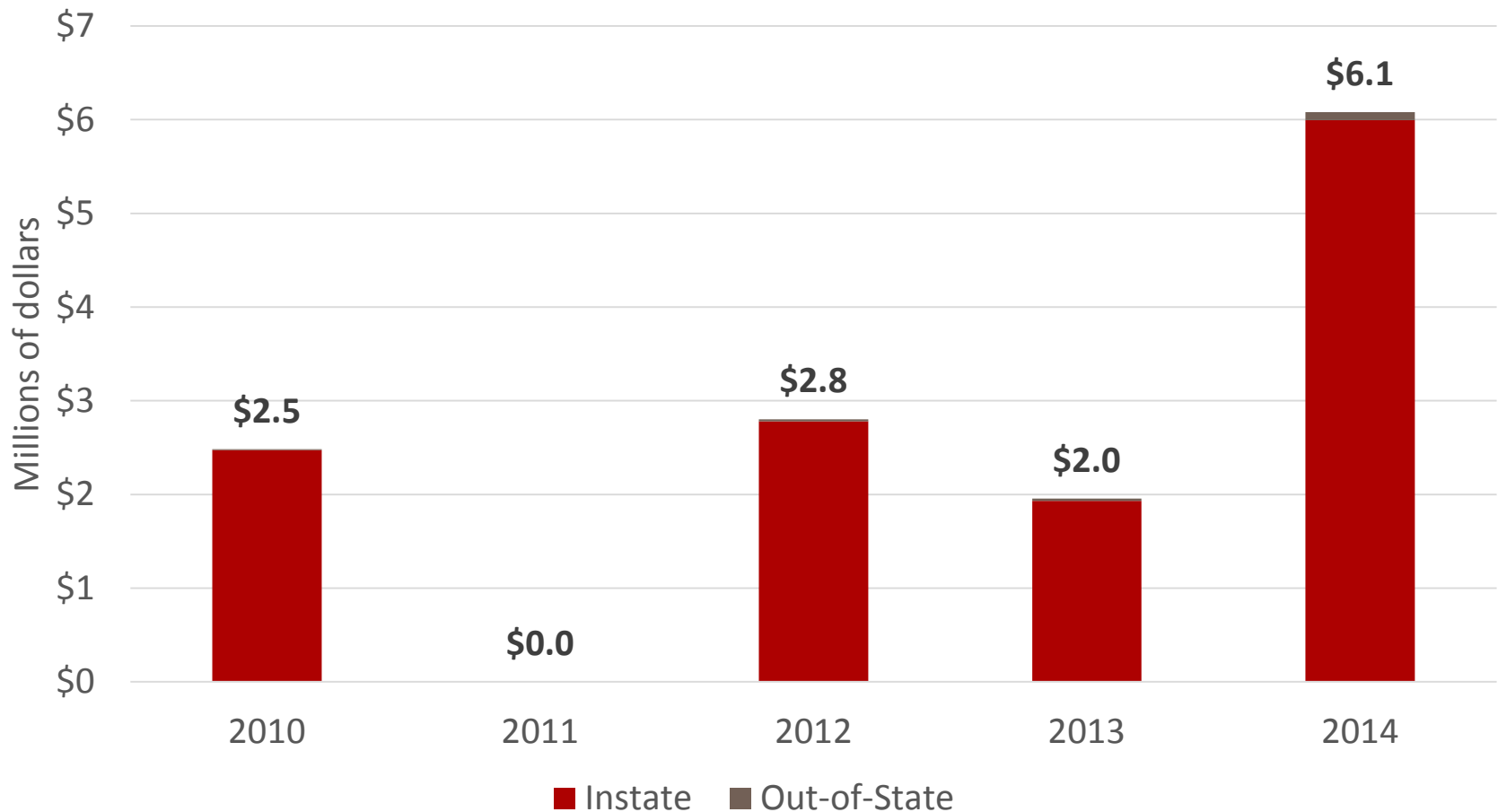
Econometric Modeling

- Goal: to measure the regional and state impacts of the construction and operation of casinos
- Direct impacts captured through primary data collection from operators
- REMI model calculates the ripple effects of the direct impacts on six sub-state areas and the Commonwealth



PRECONSTRUCTION

Preconstruction Spending by Region

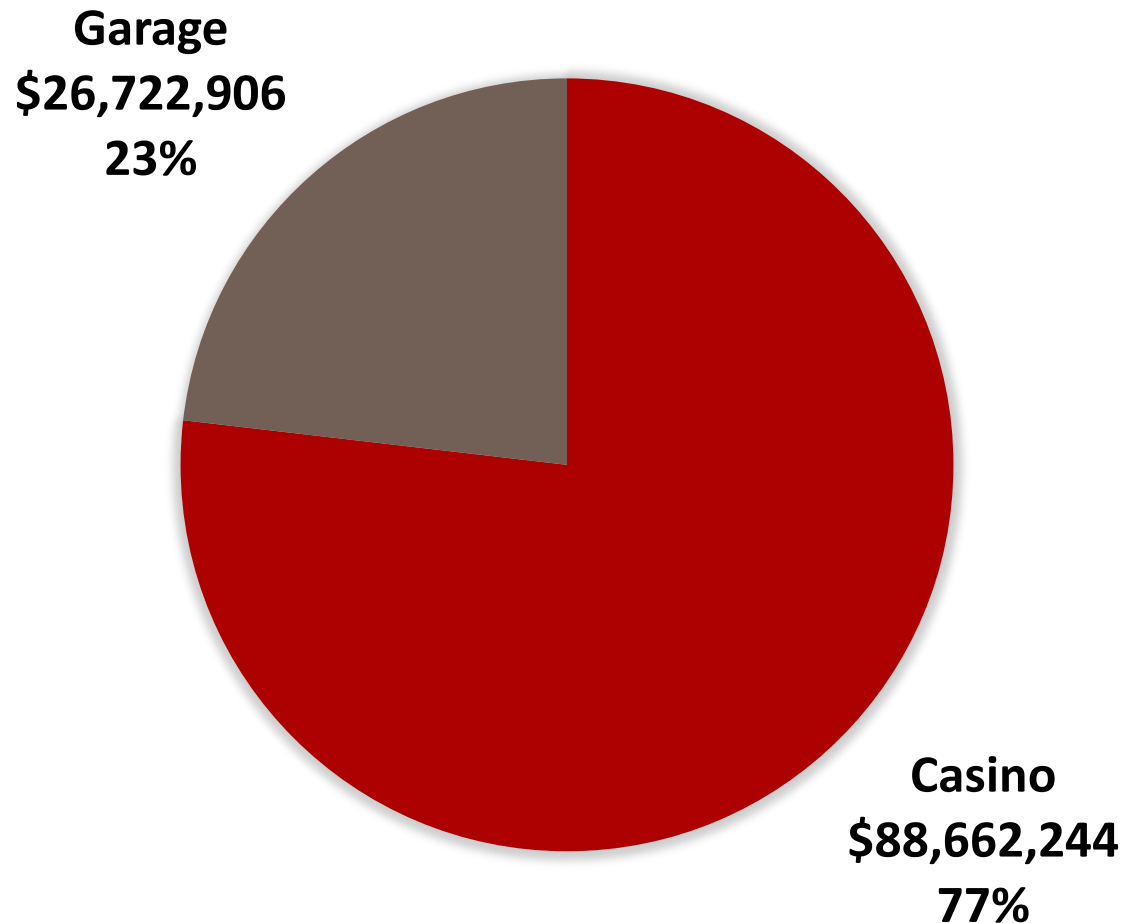


Economic Impacts of Preconstruction Spending

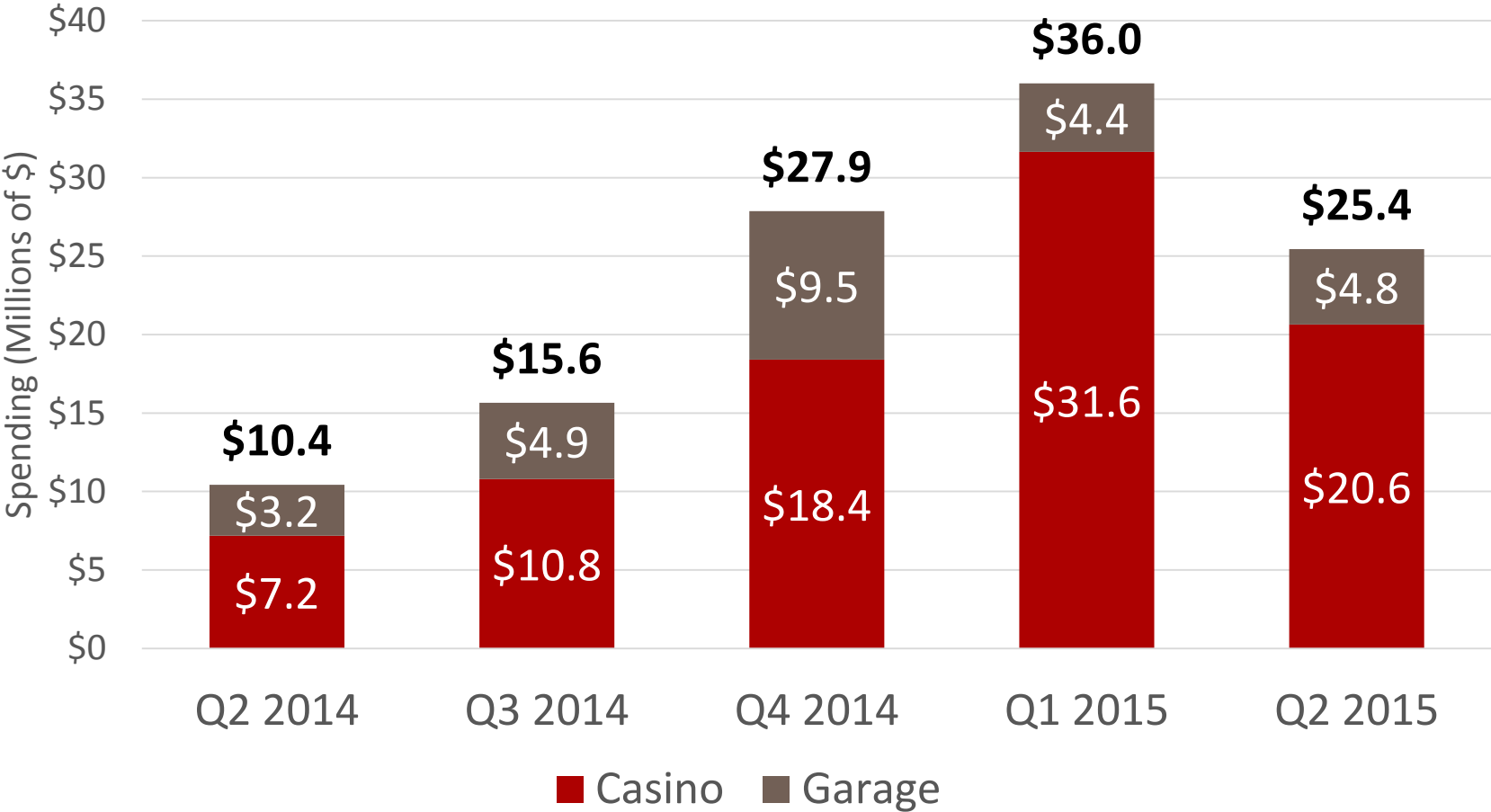
Category	Total Employment	Output	Value Added	Personal Income
Bristol and Norfolk Counties	76	\$9.7	\$6.8	\$4.7
Metro Boston	75	\$12.5	\$8.5	\$5.8
Rest of MA	19	\$2.1	\$1.4	\$2.0
Total	170	\$24.3	\$16.7	\$12.5

CONSTRUCTION

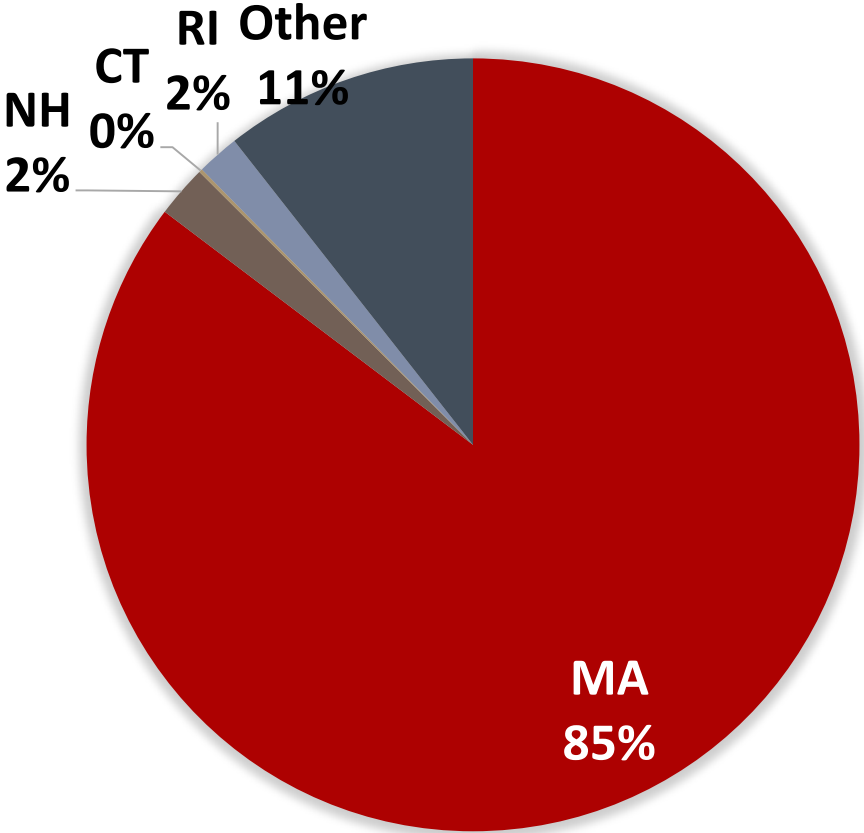
Share of Construction Spending by Project



Spending by Quarter



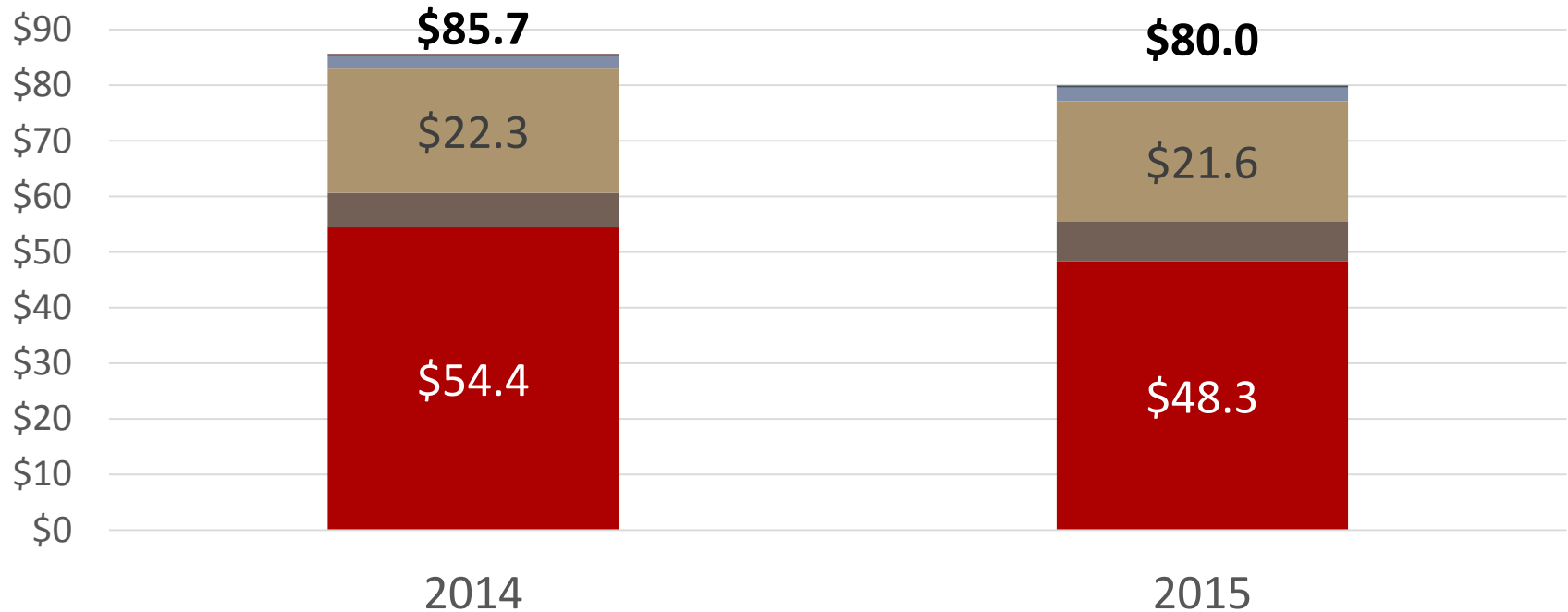
Share of Construction Spending by State



Spending by Category

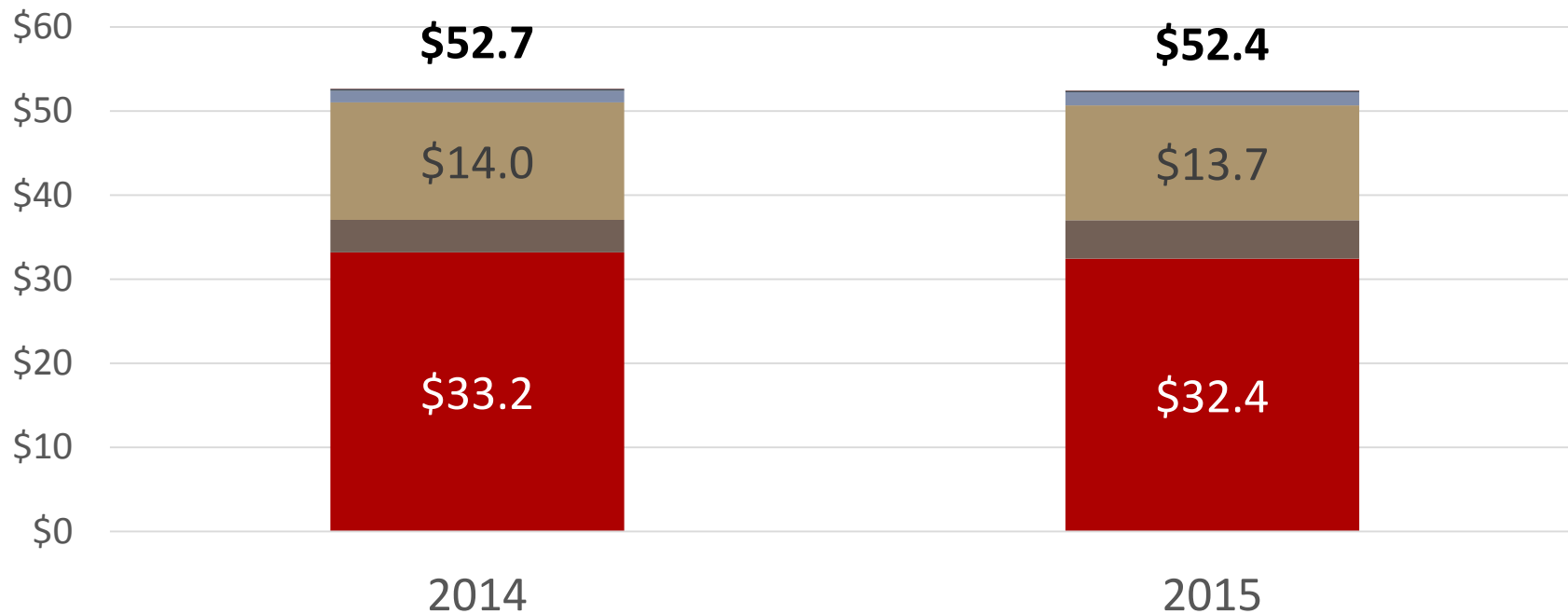
Largest Spending Categories	Total	Share
Electrical - MA	\$17.8	15%
General Conditions/ Insurance/ Bonds - MA	\$15.1	13%
HVAC - MA	\$10.2	5%
Earthwork - MA	\$7.4	3%
Pre Fab Metal Bldg - MA	\$6.0	3%
Glass & Glazing - MA	\$4.5	2%
Drywall - MA	\$4.3	2%
Plumbing - MA	\$4.0	2%
Kitchen Equipment - FL	\$3.9	2%
Concrete - MA	\$3.5	2%

Total Business Revenues



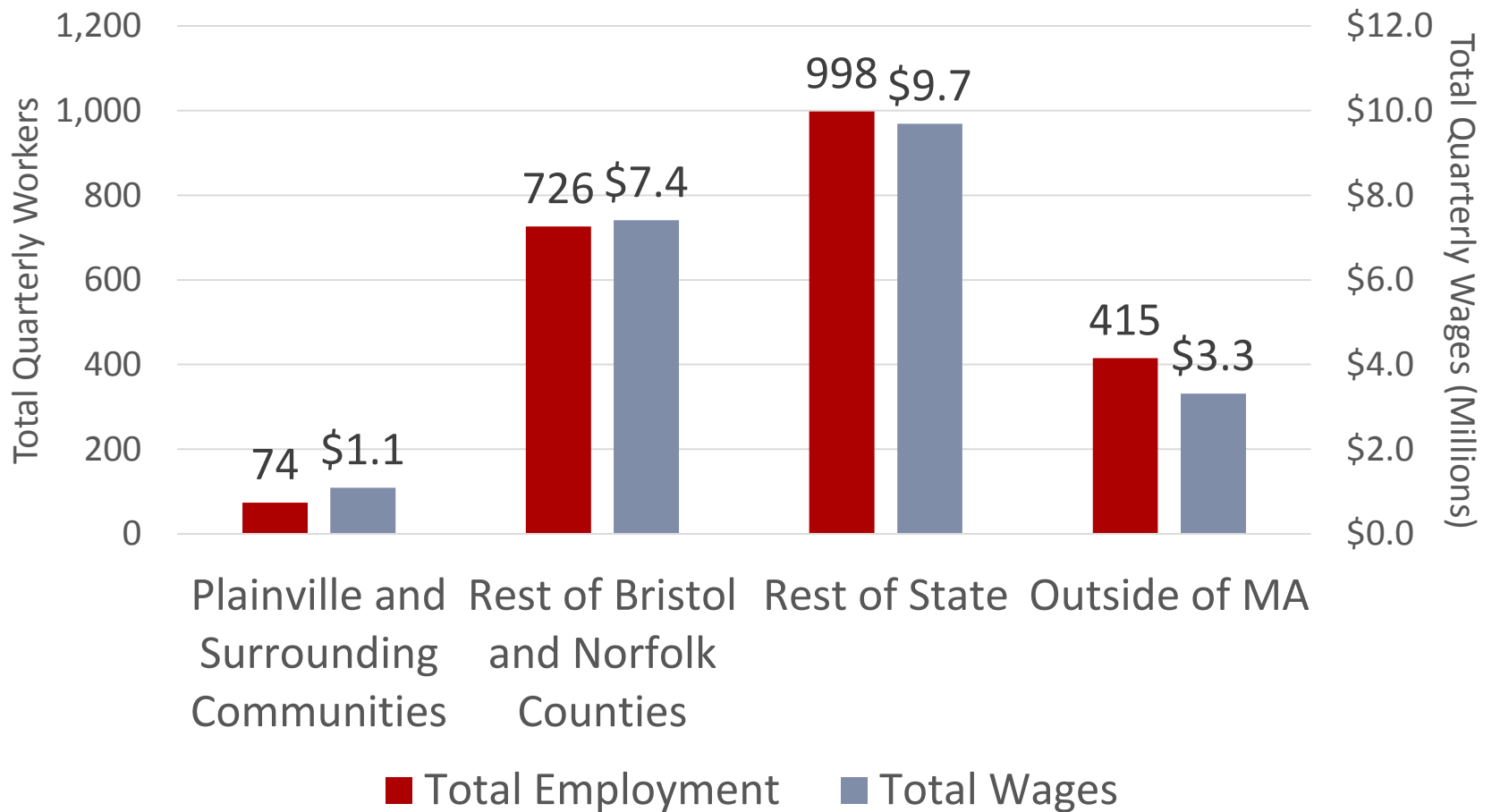
- Bristol and Norfolk Counties
- Rest of Southeastern MA
- Boston Metro
- Rest of Central MA
- Springfield Region
- Rest of Western MA

Total Value Added



- Bristol and Norfolk Counties
- Rest of Southeastern MA
- Boston Metro
- Rest of Central MA
- Springfield Region
- Rest of Western MA

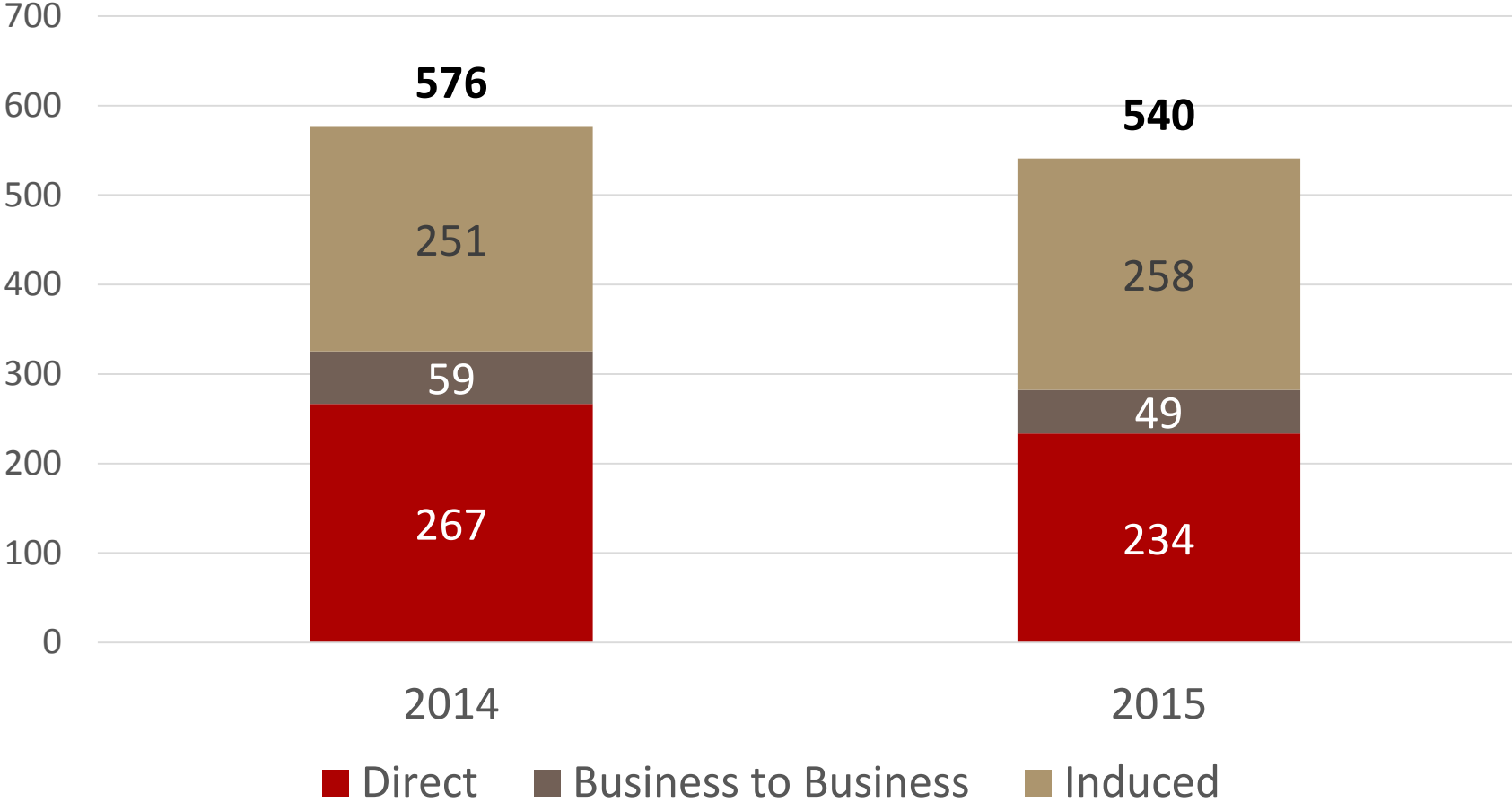
Total Quarterly Workers and Wages



Regional Comparison of Average Wages

Region	Average
Plainville and Surrounding Communities	\$14,750
Rest of Bristol and Norfolk Counties	\$10,206
Rest of State	\$9,709
Outside of MA	\$7,984
Total	\$9,717

Total Employment Impacts

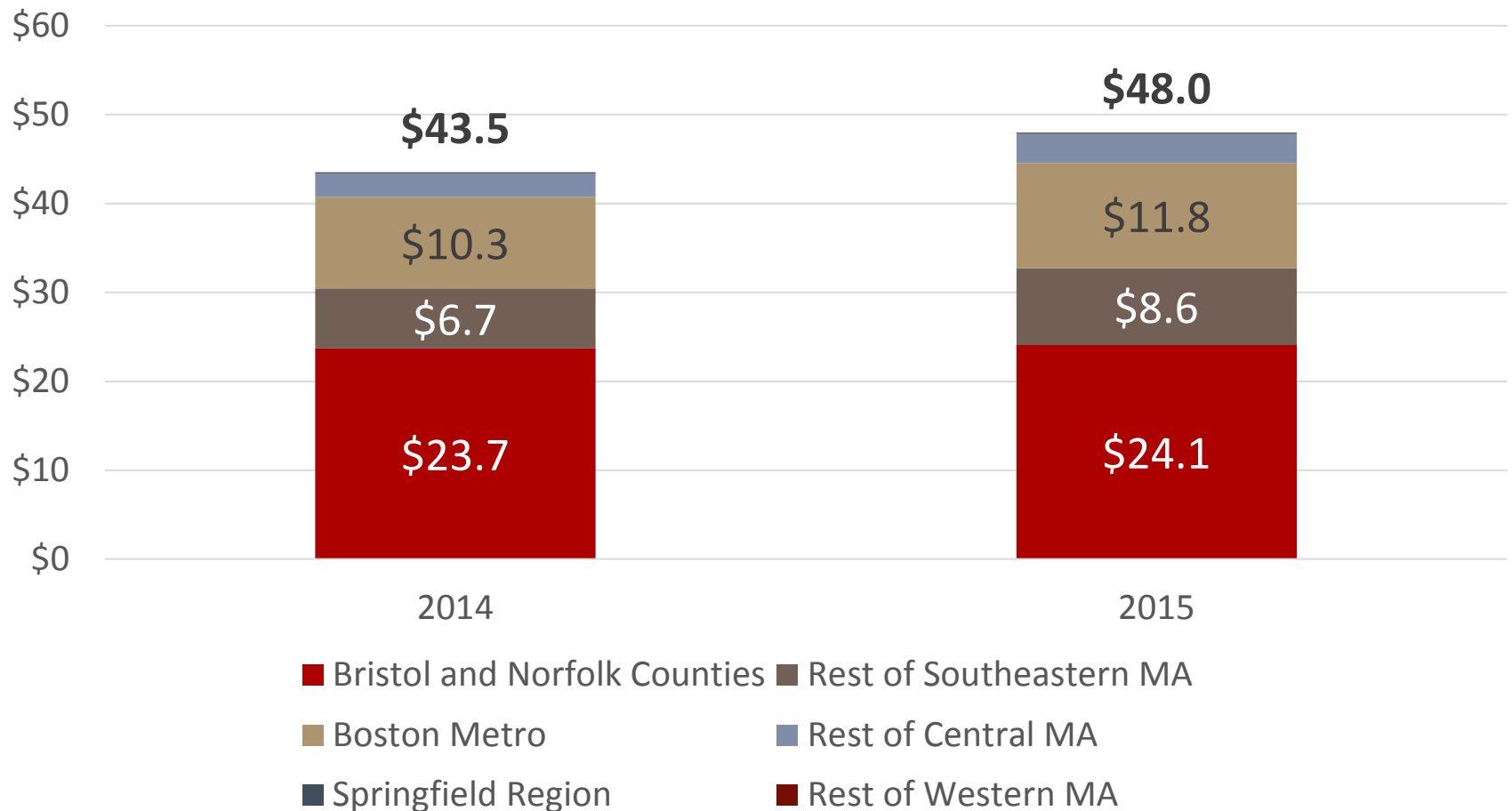


Totals may not match due to rounding.

Total Employment Impacts by Region

Total Employment (Job-Years)	2014	2015	Total
Bristol and Norfolk Counties	400	355	755
Boston Metro	102	102	203
Rest of Southeastern MA	53	61	114
Rest of Central MA	18	20	39
Springfield Region	2	2	4
Rest of Western MA	0	0	1
Total	576	540	1,116

Total Personal Income



Thank you

Contact information

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Projected versus Actual Economic Impacts of the Construction of Plainridge Park Casino

Mark Vander Linden, *Director and Manager of Research and Responsible Gambling*
Teresa Fiore, *Program Manager of Research and Responsible Gaming*

This document highlights key comparisons between the Innovation Group's 2013 report which *predicts* economic impact of casino construction with the Donahue Institute's 2016 report which *estimates* actual economic impact of casino construction.

Both reports were reviewed by the Massachusetts Gaming Commission who conferred with the economic researchers at the University of Massachusetts Donahue Institute to answer any findings related questions.



Projected Massachusetts Hires: 90%

Actual Massachusetts Hires: 81%



Projected Statewide Labor Income: \$62.6M

Actual Statewide Personal Income: \$91.5M



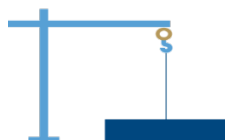
Projected Pre-Construction Budget: NA

Actual Pre-Construction Expenditure: \$13.3M



Projected Jobs Supported by Construction Phase: 959

Actual Jobs Supported by Construction Phase: 1,116



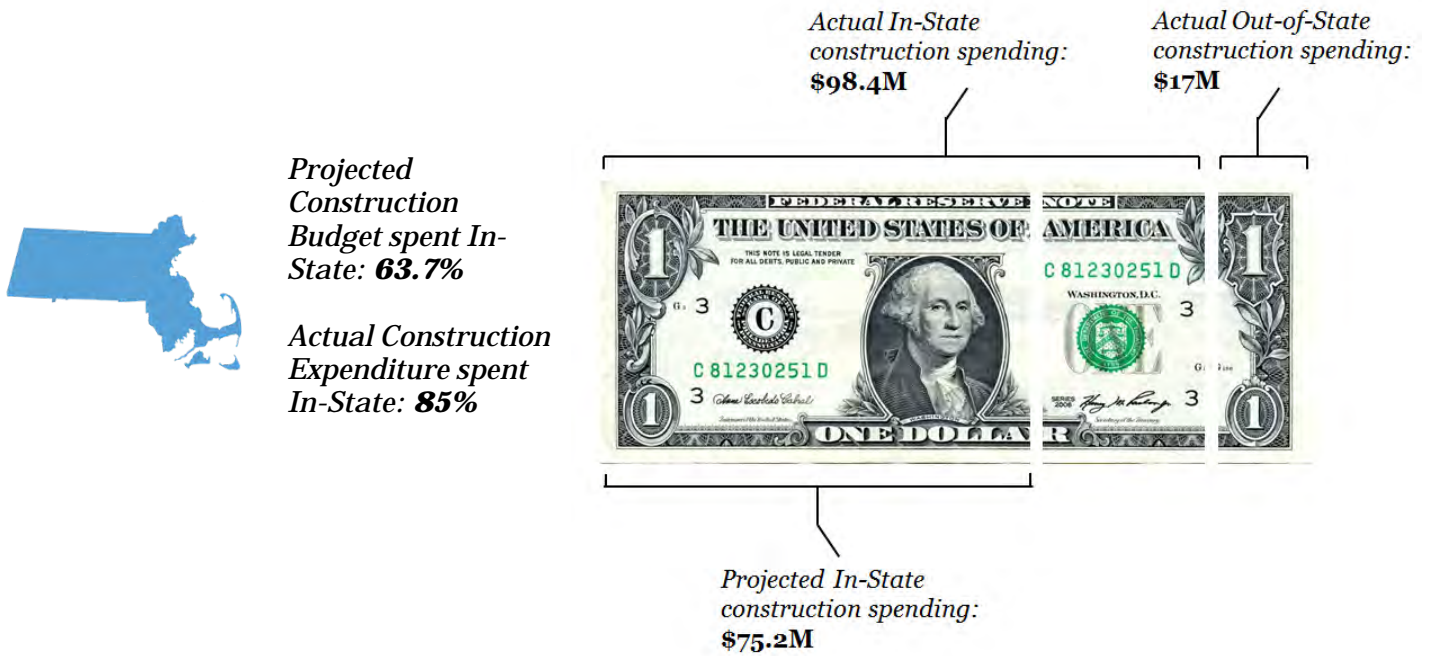
Projected Construction Budget: \$118.1M

Actual Construction Expenditure: \$115.4M



Massachusetts Gaming Commission

In-state construction spending is illustrated in both percentage and dollar amount.



Not all reported findings were able to be compared as different economic analysis tools were used for each of the studies. The Innovation Group chose the IMPLAN economic-impact model produced by MIG, Incorporated (MIG). MIG creates models of the entire United States economy, as well as every ZIP code, county, and state based on federally available information. The SEIGMA team chose the PI+ model from Massachusetts-based Regional Economic Models, Inc. (REMI) which generates realistic year-by-year estimates of the total regional effects of specific initiatives.

Although still in beginning stages of operation, to date the economy has seen positive impact as a result of the creation of the Plainridge Park Casino.

“As the spending ripples through the economy it creates total impacts that are larger than the initial project.... In total, over the 14 month process, the construction of Plainridge Park Casino added \$166 million to total business revenues and \$105 million to gross state product.”

- Donahue Institute



Massachusetts Gaming Commission



MASSACHUSETTS GAMING COMMISSION

MEMORANDUM

To: Chairman Crosby and Commissioners Cameron, Macdonald, Stebbins and Zuniga
From: Derek Lennon, CFAO
Date: 9/22/2016
Re: Fiscal Year 2016 (FY16) Closeout and Fiscal Year 2017 (FY17) First Budget Update

Summary:

The Massachusetts Gaming Commission spent \$987K less in the Gaming Control Fund in FY16 than actual revenue collected. Final spending for the Gaming Control Fund was \$27.29M. The Commission collected revenue of \$30.83M in FY16, however \$2.55M of that was slot fees for FY17 that were received in FY16. Consequently final FY16 revenues after balancing forward FY17 slot fees totaled \$28.28M, resulting in a \$987K surplus which will reduce the FY17 assessment on licensees.

FY16 Closeout:

The Massachusetts Gaming Commission approved an initial FY16 Gaming Control Fund budget of \$28.3M, requiring a \$22.2M assessment on licensees. After three quarterly updates, the Commission's revised budget projected spending of \$26.87M, and revenue of \$27.74M. Indirect costs were not budgeted in the \$26.87M spending figure. After multiple conversations and meetings with the Governor's Office of Administration and Finance, it was determined that MGC would not receive a waiver or reduction of indirect costs, which resulted in a \$1.62M unbudgeted cost. As of the third quarter update, the MGC had already set aside half of that liability, and worked with Directors over the fourth quarter to target additional areas to make up the remaining ~\$750K.

At the close of FY16, final spending in the Gaming Control Fund was \$27.29M, or approximately \$450K (1.6%) less than the projected revenues of \$27.74M. MGC exceeded its revised revenue projections by \$538K, which resulted in a surplus of \$987K 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 summarizing the FY16 spending and revenue for the Gaming Control Fund.

10500001 Gaming Control Fund 2016					
Expenses	Budget Projections		Actuals		Variance Explanation
	Initial Projection	Current Budget (Initial+Apvd Adjmts)	Actuals Total	Variance from Current Budget	
AA REGULAR EMPLOYEE COMPENSATION	6,277,143.16	5,790,163.16	5,630,381.67	(159,781.49)	
BB REGULAR EMPLOYEE RELATED EXPEN	90,900.00	95,900.00	74,633.07	(21,266.93)	
CC SPECIAL EMPLOYEES	130,506.15	222,486.15	234,821.00	12,334.85	
DD PENSION & INSURANCE RELATED EX	1,873,197.89	1,817,127.11	1,767,913.14	(49,213.97)	
EE ADMINISTRATIVE EXPENSES	476,600.16	546,978.35	2,117,689.48	1,651,997.74	Indirect Costs not budgeted \$1.62M
FF PROGRAMMATIC FACILITY OPERATIONAL SUPPLIES	500.00	62,744.01	56,342.15	(6,401.86)	
GG ENERGY COSTS AND SPACE RENTAL	1,129,453.26	1,129,453.26	1,130,556.49	1,103.23	
HH CONSULTANT SVCS (TO DEPTS)	5,221,776.14	4,578,577.63	4,496,365.83	(82,211.80)	
JJ OPERATIONAL SERVICES	3,107,792.97	3,146,292.97	3,602,022.44	455,729.47	MSP OT and salaries both AGO and MGC officers
KK Equipment Purchase	80,000.00	286,735.48	236,232.45	(50,503.03)	
LL EQUIPMENT LEASE-MAINTAIN/REPAR	25,617.71	32,617.71	27,486.98	(5,130.73)	
MM PURCHASED CLIENT/PROGRAM SVCS	35,000.00	35,000.00	-	(35,000.00)	
NN INFRASTRUCTURE:	-	-	2,084.18	2,084.18	
PP STATE AID/POL SUB	3,011,010.00	2,961,010.00	2,754,726.37	(206,283.63)	Supplier Diversity Grants, No region C grants, and Data storage project for responsible gaming.
TT LOANS AND SPECIAL PAYMENTS (reimbursement 0810-1204)	-	-	57,105.44	57,105.44	
UU IT Non-Payroll Expenses	4,483,188.84	4,154,058.45	3,651,942.35	(502,116.10)	Mobile device management, video surveillance platform and LMS all underspent in FY16.
ISA to DPH, AGO , ABCC, POL & EOHS	2,369,684.91	2,019,684.91	1,453,090.43	(562,069.29)	Underspending in AGO ISA, but some overspending in their MSP OT and salaries
Grand Total	28,312,371.19	26,878,829.19	27,293,393.47	500,376.08	
Revenue Projections					
Revenues	Budget Projections		Actuals		Variance Explanation
	Initial Projection	Current Budget (Initial+Apvd Adjmts)	Actuals Total	Variance from Current Projections	
Gaming Control Fund Beginning Balance	-	3,326,752.71	3,326,752.71	-	
Phase 1 Collections (restricted)	-	-	189,704.24	189,704.24	
Phase 1 Refunds	-	-	(78,820.74)	(78,820.74)	
Phase 2 Category 1 Collections (restricted)	-	-	-	-	
Region C Phase 1 Investigation Collections	200,000.00	200,000.00	433,760.65	233,760.65	Additional applicants
Region C Phase 2 Category 1 Collections	800,000.00	580,000.00	580,000.00	-	
Grant Collections (restricted)	400,000.00	50,000.00	-	(50,000.00)	No grant funds required
Region A slot Machine Fee	1,945,200.00	1,945,200.00	1,945,200.00	-	
Region B Slot Machine Fee	1,800,000.00	1,800,000.00	3,600,000.00	1,800,000.00	FY17 fees received in FY16
Slots Parlor Slot Machine Fee, REG B	750,000.00	750,000.00	1,500,000.00	750,000.00	FY17 fees received in FY16
Gaming Employee License Fees (GEL)	30,000.00	30,000.00	116,400.00	86,400.00	
Key Gaming Executive (GKE)	35,000.00	35,000.00	5,000.00	(30,000.00)	
Key Gaming Employee (GKS)	20,000.00	20,000.00	50,000.00	30,000.00	
Non-Gaming Vendor (NGV)	30,000.00	30,000.00	47,800.00	17,800.00	
Vendor Gaming Primary (VGP)	45,000.00	45,000.00	83,429.22	38,429.22	
Vendor Gaming Secondary (VGS)	40,000.00	40,000.00	95,000.00	55,000.00	
Gaming Service Employee License (SER)	-	-	39,975.00	39,975.00	
Subcontractor ID Initial License (SUB)	-	-	-	-	
Temporary License Initial License (TEM)	-	-	-	-	
Veterans Initial License (VET)	-	-	-	-	
Transfer of Licensing Fees to CMF	-	-	-	-	
Assessment, REG B, REG A and SLOT Parlor	22,217,171.19	18,890,418.48	18,890,418.52	0.04	
Misc	-	-	6,275.00	6,275.00	
Grand Total	28,312,371.19	27,742,371.19	30,830,894.60	3,088,523.41	
Adjustment Move to FY17 for Reg B and Slots Parlor Slot Fee			(2,550,000.00)	(2,550,000.00)	Balance forward of FY17 fees received in FY16
FY16 Revenue Surplus/(Shortage)		863,542.00	987,501.13		Decrease FY17 Assessments

FY17 First Update:

Gaming Control Fund 1050-0001

The Massachusetts Gaming Commission approved a FY17 budget for the Gaming Control Fund of \$27.17M which required an assessment of \$22.39M on licensees. The spending is composed of \$20.3M for gaming operations, \$4.49M for Research and Responsible Gaming and a \$2.37M assessment for the Office of the Attorney General's (AGO) gaming operations inclusive of Massachusetts State Police (MSP) assigned to the AGO. The FY16 balanced forward of \$987K in unrestricted revenues will result in a reduction in the annual assessment. To date, the divisions have requested amendments to the initial budget that result in \$32.5K in additional spending. This is not surprising as the FY17 budget eliminated many contingency items. However, at this point, the MGC Office of Finance and Administration is not recommending any cuts to offset the increased spending and will wait until the second quarter to get a better picture of what items will not spend on time, and find any savings generated from attrition or late hires.

Appendix A to this document is the budget to actual spending and revenue for each account for the MGC for the first two months of the 2017 fiscal year. The spending section of Appendix A has a column titled Proposed Adjustments. This column references budget transfers division Directors have requested, and are laid out in detail in Appendix B. All of the remaining appropriations on Appendix A are related to the Racing division. 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 the FY16 practice, the MGC Office of Finance and Administration is recommending that the balance forward credit the FY17 assessment. The result of the balance forward of \$987K in unrestricted revenue from FY16 will decrease the FY17 assessment from \$22.39MM to \$21.4M. The chart below shows how the FY16 assessment was apportioned, and what the excess revenue will mean to the licensees' FY17 assessments. Based on the revised assessment schedule, we will be issuing our next quarterly billing for licensee assessments at the close of September.

FY16 Assessment Percents for Distribution of Balance Forward								
				FY16 Balance Forward	987,501.13			
	Slots	Table Games	Table Gaming Positions*	Total Gaming Positions*	Percentage of Gaming Positions	FY17 Credit		
MGM	3,000	100	600	3,600	38.50%	\$380,187.94		
Wynn	3,242	168	1,008	4,250	45.45%	\$448,819.26		
Penn	1,250	-	-	1,500	16.04%	\$158,395.18		
	7,492	268	1,608	9,350	100.00%	\$987,402.38		
FY17 Revised Assessment								
				FY17 Assessment	22,390,494.52			
Licensee	Slots	Table Games	Table Gaming Positions*	Total Gaming Positions*	Percentage of Gaming Positions	FY17 Initial Assessment	Credit	Revised Assessment
MGM	3,000	100	600	3,600	38.99%	\$8,730,183.07	\$380,187.94	\$8,349,995.13
Wynn	3,242	168	1,008	4,250	46.03%	\$10,306,466.12	\$448,819.26	\$9,857,646.86
Penn	1,250	-	-	1,383	14.98%	\$3,353,845.33	\$158,395.18	\$3,195,450.15
	7,492	268	1,608	9,233	100.00%	\$22,390,494.52	\$987,402.38	\$21,403,092.14
<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 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:

The Massachusetts Gaming Commission approved an initial FY17 Gaming Control Fund budget of \$27.17M, requiring a \$22.39M assessment on licensees. After closing out FY16 and opening FY17, the Commission has surplus FY16 revenue of \$987.5K in the Gaming Control Fund. Staff is asking for approval to credit the \$987.5K to licensees in the amounts contained in the chart above.

Appendix A: FY17 Actuals Spending and Revenue as of 9-1-2016

Appendix B: QRY Step 16A Budget Amendment Requests by Quarter by Object Class

Appendix C: QRY Step 05A Expense Budget Form

2017		Budget Projections			Actuals			
Row Labels	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget	July	August	Actuals To Date	
				(Initial+Bal Fwd+Apvd Adjmts)			Total	%Spent
10500001								
AA REGULAR EMPLOYEE COMPENSATION	\$ 6,442,204.17		\$ (7,500.00)	\$ 6,442,204.17	\$ 358,573.73	\$ 441,056.63	\$ 799,630.36	12%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 73,000.00		\$ 7,900.00	\$ 73,000.00	\$ 1,389.37	\$ 2,236.03	\$ 3,625.40	5%
CC SPECIAL EMPLOYEES	\$ 120,000.00		\$ 2,500.00	\$ 120,000.00	\$ 16,649.80	\$ 19,060.00	\$ 35,709.80	30%
DD PENSION & INSURANCE RELATED EX	\$ 2,322,173.63		\$ -	\$ 2,322,173.63	\$ 120,524.39	\$ 155,189.14	\$ 275,713.53	12%
EE ADMINISTRATIVE EXPENSES	\$ 2,251,920.84		\$ 2,100.00	\$ 2,251,920.84	\$ 38,260.41	\$ 153,503.68	\$ 191,764.09	9%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 500.00		\$ -	\$ 500.00	\$ -	\$ -	\$ -	0%
GG ENERGY COSTS AND SPACE RENTAL	\$ 1,221,982.62		\$ -	\$ 1,221,982.62	\$ 95,562.61	\$ 113,954.50	\$ 209,517.11	17%
HH CONSULTANT SVCS (TO DEPTS)	\$ 2,692,103.14		\$ (40,000.00)	\$ 2,692,103.14	\$ -	\$ 68,432.48	\$ 68,432.48	3%
JJ OPERATIONAL SERVICES	\$ 3,613,989.54		\$ 57,500.00	\$ 3,613,989.54	\$ -	\$ 219,382.10	\$ 219,382.10	6%
KK Equipment Purchase	\$ -		\$ 7,000.00	\$ -	\$ -	\$ -	\$ -	#DIV/0!
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 29,683.80		\$ -	\$ 29,683.80	\$ 344.89	\$ 344.89	\$ 689.78	2%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 40,000.00		\$ -	\$ 40,000.00	\$ -	\$ -	\$ -	0%
NN INFRASTRUCTURE:	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	0%
PP STATE AID/POL SUB	\$ 2,680,000.00		\$ -	\$ 2,680,000.00	\$ -	\$ (15,000.00)	\$ (15,000.00)	-1%
UU IT Non-Payroll Expenses	\$ 3,704,596.18		\$ 2,980.00	\$ 3,704,596.18	\$ 5,408.18	\$ 266,597.91	\$ 272,006.09	7%
ISA to DPH & AGO	\$ 1,979,540.60		\$ -	\$ 1,979,540.60	\$ -	\$ 88,559.52	\$ 88,559.52	4%
Grand Total	\$ 27,171,694.52	\$ -	\$ 32,480.00	\$ 27,171,694.52	\$ 636,713.38	\$ 1,513,316.88	\$ 2,150,030.26	8%

		Revenue Projections			Actuals			
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget	FY17 Beginning Balance	July	August	Actuals Total
				(Initial+Apvd Adjmts)				
Gaming Control Fund Beginning Balance 0500		\$ 978,501.13	\$ -	\$ 978,501.13	\$ 987,501.13			\$ 987,501.13
Phase 1 Collections (restricted) 0500			\$ -	\$ -				\$ -
Phase 1 Refunds 0500			\$ -	\$ -				\$ -
Phase 2 Category 1 Collections (restricted) 0500			\$ -	\$ -				\$ -
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				\$ -
Region A slot Machine Fee 0500	\$ 1,945,200.00		\$ -	\$ 1,945,200.00		\$ 1,716,000.00		\$ 1,716,000.00
Region B Slot Machine Fee 0500	\$ 1,800,000.00		\$ -	\$ 1,800,000.00	\$ 1,800,000.00			\$ 1,800,000.00
Slots Parlor Slot Machine Fee 0500	\$ 750,000.00		\$ -	\$ 750,000.00	\$ 750,000.00			\$ 750,000.00
Gaming Employee License Fees (GEL) 3000	\$ 35,000.00		\$ -	\$ 35,000.00		\$ 4,425.00	\$ 1,200.00	\$ 5,625.00
Key Gaming Executive (GKE) 3000	\$ 5,000.00		\$ -	\$ 5,000.00		\$ 1,000.00	\$ 5,000.00	\$ 6,000.00
Key Gaming Employee (GKS) 3000	\$ 15,000.00		\$ -	\$ 15,000.00		\$ 2,100.00	\$ 1,000.00	\$ 3,100.00
Non-Gaming Vendor (NGV) 3000	\$ 31,000.00		\$ -	\$ 31,000.00		\$ 2,600.00	\$ 4,100.02	\$ 6,700.02
Vendor Gaming Primary (VGP) 3000	\$ 30,000.00		\$ -	\$ 30,000.00			\$ 15,000.00	\$ 15,000.00
Vendor Gaming Secondary (VGS) 3000	\$ 45,000.00		\$ -	\$ 45,000.00				\$ -
Gaming Service Employee License (SER) 3000	\$ 15,000.00		\$ -	\$ 15,000.00		\$ 3,675.00	\$ 375.00	\$ 4,050.00
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		\$ (987,501.13)	\$ 22,450,494.52		\$ 3,021,007.10	\$ 2,576,616.53	\$ 5,597,623.63
Misc 0500			\$ -	\$ -				\$ -
Grand Total	\$ 27,171,694.52	\$ 978,501.13	\$ (987,501.13)	\$ 28,150,195.65	\$ 3,537,501.13	\$ 4,750,807.10	\$ 2,603,291.55	\$ 10,891,599.78
Balance				\$ 978,501.13				

		Budget Projections			Actuals			
Row Labels	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget	July	August	Actuals To Date	
				(Initial+Bal Fwd+Apvd Adjmts)			Total	%Spent
10500002								
TT LOANS AND SPECIAL PAYMENTS	\$ -		\$ -	\$ -			\$ -	#DIV/0!
		Revenue Projections			Actuals			
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total
Greyhound Balance Forward Simulcast 7200			\$ -	\$ -	\$ 169,193.46			\$ -
Plainridge Greyhound Import Simulcast 7200	\$ 32,174.19		\$ -	\$ 32,174.19	\$ -		\$ 2,562.27	\$ 2,562.27
Raynham Greyhound Import Simulcast 7200	\$ 112,449.69		\$ -	\$ 112,449.69	0	\$ 19,201.54	\$ 9,922.05	\$ 29,123.59
Wonderland Greyhound Import Simulcast 7200	\$ 36,338.91		\$ -	\$ 36,338.91	0		\$ 5,557.27	\$ 5,557.27
	\$ 180,962.79	\$ -	\$ -	\$ 180,962.79	\$ 169,193.46	\$ 19,201.54	\$ 18,041.59	\$ 37,243.13

		Budget Projections			Actuals			
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Row Labels	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget		July	August	Actuals To Date	
				(Initial+Bal Fwd+Apvd Adjmts)				Total	%Spent
1050003									
AA REGULAR EMPLOYEE COMPENSATION	\$ 383,644.22			\$ 383,644.22		\$ 22,580.30	\$ 30,695.90	\$ 53,276.20	14%
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 12,000.00			\$ 12,000.00		\$ -	\$ 347.17	\$ 347.17	3%
CC SPECIAL EMPLOYEES	\$ 330,000.00			\$ 330,000.00		\$ 40,617.42	\$ 44,979.17	\$ 85,596.59	26%
DD PENSION & INSURANCE RELATED EX	\$ 135,249.14			\$ 135,249.14		\$ 8,613.47	\$ 11,539.34	\$ 20,152.81	15%
EE ADMINISTRATIVE EXPENSES	\$ 32,855.00			\$ 32,855.00		\$ 6,319.77	\$ 10,940.34	\$ 17,260.11	53%
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 2,000.00			\$ 2,000.00				\$ -	0%
HH CONSULTANT SVCS (TO DEPTS)	\$ 25,000.00			\$ 25,000.00				\$ -	0%
JJ OPERATIONAL SERVICES	\$ 238,300.00			\$ 238,300.00			\$ 30,533.28	\$ 30,533.28	13%
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 3,500.00			\$ 3,500.00				\$ -	0%
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 235,000.00			\$ 235,000.00				\$ -	0%
NN INFRASTRUCTURE:				\$ -				\$ -	#DIV/0!
UU IT Non-Payroll Expenses	\$ 78,700.00			\$ 78,700.00			\$ 13,831.74	\$ 13,831.74	18%
ISA to DPH				\$ -				\$ -	#DIV/0!
Grand Total	\$ 1,476,248.36			\$ 1,476,248.36		\$ 78,130.96	\$ 142,866.94	\$ 220,997.90	15%

Revenues	Revenue Projections				Actuals				
	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total	
Plainridge Assessment 4800	\$ 170,849.60		\$ -	\$ 170,849.60	\$ -		\$ 10,362.00	\$ 10,362.00	
Plainridge Daily License Fee 3003	\$ 124,695.42		\$ -	\$ 124,695.42	\$ -		\$ 9,000.00	\$ 9,000.00	
Plainridge Occupational License 3003/3004	\$ 85,000.00		\$ -	\$ 85,000.00	\$ -		\$ 4,475.00	\$ 4,475.00	
Plainridge Racing Development Oversight Live 0131	\$ 18,674.66		\$ -	\$ 18,674.66	\$ -		\$ 1,623.68	\$ 1,623.68	
Plainridge Racing Development Oversight Simulcast 0131	\$ 264,972.66		\$ -	\$ 264,972.66	\$ -		\$ 22,190.45	\$ 22,190.45	
Racing Oversight and Development Balance Forward 0131			\$ -	\$ -	\$ 1,807,217.44			\$ 1,807,217.44	
Raynham Assessment 4800	\$ 126,681.83		\$ -	\$ 126,681.83	\$ -	\$ 18,828.26	\$ 9,568.46	\$ 28,396.72	
Raynham Daily License Fee 3003	\$ 110,931.00		\$ -	\$ 110,931.00	\$ -	\$ 18,000.00	\$ 9,300.00	\$ 27,300.00	
Raynham Racing Development Oversight Simulcast 0131	\$ 457,149.55		\$ -	\$ 457,149.55	\$ -	\$ 79,270.12	\$ 42,767.13	\$ 122,037.25	
Suffolk Assessment 4800	\$ 437,169.33		\$ -	\$ 437,169.33	\$ -		\$ 40,364.70	\$ 40,364.70	
Suffolk Commission Racing Development Oversight Simulcast 0131	\$ 170,748.32		\$ -	\$ 170,748.32	\$ -		\$ 14,157.14	\$ 14,157.14	
Suffolk Daily License Fee 3003	\$ 80,631.00		\$ -	\$ 80,631.00	\$ -		\$ 6,600.00	\$ 6,600.00	
Suffolk Occupational License 3003/3004	\$ 20,000.00		\$ -	\$ 20,000.00	\$ -	\$ 330.00	\$ 18,300.00	\$ 18,630.00	
Suffolk Racing Development Oversight Live 0131			\$ -	\$ -	\$ -			\$ -	
Suffolk TVG Commission Live 0131			\$ -	\$ -	\$ -			\$ -	
Suffolk TVG Commission Simulcast 0131	\$ 92,997.43		\$ -	\$ 92,997.43	\$ -	\$ 21,069.95	\$ 15,787.29	\$ 36,857.24	
Suffolk Twin Spires Commission Live 0131			\$ -	\$ -	\$ -			\$ -	
Suffolk Twin Spires Commission Simulcast 0131	\$ 92,997.43		\$ -	\$ 92,997.43	\$ -	\$ 13,748.86	\$ 10,002.97	\$ 23,751.83	
Suffolk Xpress Bet Commission Live 0131			\$ -	\$ -	\$ -			\$ -	
Suffolk Xpress Bet Commission Simulcast 0131	\$ 92,997.43		\$ -	\$ 92,997.43	\$ -		\$ 4,354.96	\$ 4,354.96	
Transfer to General Fund 10500140 0000			\$ -	\$ -	\$ -			\$ -	
Wonderland Assessment 4800	\$ 15,132.22		\$ -	\$ 15,132.22	\$ -		\$ 3,103.03	\$ 3,103.03	
Wonderland Daily License Fee 3003	\$ 80,073.00		\$ -	\$ 80,073.00	\$ -		\$ 14,100.00	\$ 14,100.00	
Wonderland Racing Development Oversight Simulcast 0131	\$ 120,746.64		\$ -	\$ 120,746.64	\$ -		\$ 10,288.39	\$ 10,288.39	
Plainridge fine 2700			\$ -	\$ -	\$ -			\$ -	
Suffolk Fine 2700			\$ -	\$ -	\$ -			\$ -	
Plainridge Unclaimed wagers 5009	\$ 185,000.00		\$ -	\$ 185,000.00	\$ -			\$ -	
Suffolk Unclaimed wagers 5009	\$ 250,000.00		\$ -	\$ 250,000.00	\$ -			\$ -	
Raynham Unclaimed wagers 5009	\$ 155,000.00		\$ -	\$ 155,000.00	\$ -			\$ -	
Wonderland Unclaimed wagers 5009	\$ 7,000.00		\$ -	\$ 7,000.00	\$ -			\$ -	
Misc 0131			\$ -	\$ -	\$ -			\$ -	
Grand Total	\$3,159,447.52	\$0.00	\$0.00	\$3,159,447.52	\$1,807,217.44	\$151,247.19	\$246,345.20	\$2,204,809.83	\$0.00

Row Labels	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget		July	August	Actuals To Date	
				(Initial+Bal Fwd+Apvd Adjmts)				Total	%Spent
10500005									
TT LOANS AND SPECIAL PAYMENTS (Race Horse Dev Fund)	\$ 14,400,000.00	\$ -	\$ -	\$ 14,400,000.00		\$ 1,853,508.84	\$ 633,444.10	\$ 2,486,952.94	17%
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total	
Balance forward prior year 3003				\$ -	\$ 12,962,441.68			\$ 12,962,441.68	
Race Horse Development Fund assessment 3003	\$ 15,000,000.00			\$ 15,000,000.00	\$ -	\$ 1,248,979.75		\$ 1,248,979.75	
Grand Total	\$ 15,000,000.00	\$ -	\$ -	\$ 15,000,000.00	\$ 12,962,441.68	\$ 1,248,979.75	\$ -	\$ 14,211,421.43	\$ -

Row Labels	Budget Projections			Current Budget	FY17 Beginning Balance	Actuals		Actuals To Date Total	%Spent
	Initial Projection	Approved Adjustments	Proposed Adjustments	(Initial+Bal Fwd+Apvd Adjmts)		July	August		
10500012									
TT LOANS AND SPECIAL PAYMENTS	\$ -	\$ -	\$ -	\$ -				\$ -	#DIV/0!
	Revenue Projections				Actuals				
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total	
Plainridge Import Harness Horse Simulcast 0131	\$ 1,933.38			\$ 1,933.38	\$ -		\$ 1,480.10	\$ 1,480.10	
Plainridge Racing Harness Horse Live 0131	\$ 7,272.51			\$ 7,272.51	\$ -		\$ 1,606.99	\$ 1,606.99	
Raynham Import Plainridge Simulcast 0131	\$ 298.34			\$ 298.34	\$ -	\$ 711.81	\$ 399.01	\$ 1,110.82	
Suffolk Import Plainridge Simulcast 0131	\$ -			\$ -	\$ -		\$ 312.16	\$ 312.16	
Plainridge Racecourse Promo Fund Beginning Balance 7205	\$ -			\$ -	17,739.08			\$ 17,739.08	
TVG Live 0131	\$ -			\$ -	\$ -			\$ -	
TVG Simulcast 0131	\$ 9,048.31			\$ 9,048.31	\$ -	\$ 1,597.23	\$ 1,184.00	\$ 2,781.23	
Twin Spires Live 01	\$ -			\$ -	\$ -			\$ -	
Twin Spires Simulcast 0131	\$ 11,759.99			\$ 11,759.99	\$ -	\$ 1,631.08	\$ 1,203.95	\$ 2,835.03	
Xpress Bets Live 0131	\$ -			\$ -	\$ -			\$ -	
Xpress Bets Simulcast 0131	\$ 2,460.58			\$ 2,460.58	\$ -	\$ -	\$ 250.61	\$ 250.61	
NYRA Live 0131	\$ -			\$ -	\$ -			\$ -	
NYRA Simulcast 0131	\$ -			\$ -	\$ -			\$ -	
Grand Total	\$ 32,773.11	\$ -	\$ -	\$ 32,773.11	\$ 17,739.08	\$ 3,940.12	\$ 6,436.82	\$ 28,116.02	\$ -

Row Labels	Budget Projections			Current Budget	FY17 Beginning Balance	Actuals		Actuals To Date Total	%Spent
	Initial Projection	Approved Adjustments	Proposed Adjustments	(Initial+Bal Fwd+Apvd Adjmts)		July	August		
10500013									
TT LOANS AND SPECIAL PAYMENTS	\$ 125,000.00	\$ -	\$ -	\$ 125,000.00	\$ -	\$ -	\$ -	\$ -	0%
	Revenue Projections				Actuals				
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total	
Plainridge Import Harness Horse Simulcast 0131	\$ 24,981.94			\$ 24,981.94	\$ -		\$ 3,156.54	\$ 3,156.54	
Plainridge Racing Harness Horse Live 0131	\$ 12,020.54			\$ 12,020.54	\$ -		\$ 2,670.22	\$ 2,670.22	
Raynham Import Plainridge Simulcast 0131	\$ 3,825.51			\$ 3,825.51	\$ -	\$ 1,297.26	\$ 769.14	\$ 2,066.40	
Suffolk Import Plainridge Simulcast 0131	\$ -			\$ -	\$ -		\$ 696.60	\$ 696.60	
Plainridge Capital Improvement Fund Beginning Balance 7205	\$ -			\$ -	269,358.42			\$ 269,358.42	
TVG Live 0131	\$ -			\$ -	\$ -			\$ -	
TVG Simulcast 0131	\$ 23,526.60			\$ 23,526.60	\$ -	\$ 4,436.37	\$ 2,969.42	\$ 7,405.79	
Twin Spires Live 0131	\$ -			\$ -	\$ -			\$ -	
Twin Spires Simulcast 0131	\$ 28,932.47			\$ 28,932.47	\$ -	\$ 5,038.53	\$ 3,021.98	\$ 8,060.51	
Xpress Bets Live 0131	\$ -			\$ -	\$ -			\$ -	
Xpress Bets Simulcast 0131	\$ 9,228.91			\$ 9,228.91	\$ -	\$ -	\$ 753.21	\$ 753.21	
NYRA Live 0131	\$ -			\$ -	\$ -			\$ -	
NYRA Simulcast 0131	\$ -			\$ -	\$ -			\$ -	
Grand Total	\$102,515.97	\$0.00	\$0.00	\$102,515.97	\$269,358.42	\$10,772.16	\$14,037.11	\$294,167.69	

Row Labels	Budget Projections			Current Budget	FY17 Beginning Balance	Actuals		Actuals To Date Total	%Spent
	Initial Projection	Approved Adjustments	Proposed Adjustments	(Initial+Bal Fwd+Apvd Adjmts)		July	August		
10500021									
TT LOANS AND SPECIAL PAYMENTS	\$ 146,000.00	\$ -	\$ -	\$ 146,000.00				\$ -	0%
	Revenue Projections				Actuals				
Revenues	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total	
Plainridge Import Suffolk Simulcast 0131	\$ 31,069.66			\$ 31,069.66	\$ -		\$ 2,612.56	\$ 2,612.56	
Raynham Import Suffolk Simulcast 0131	\$ 15,440.76			\$ 15,440.76	\$ -	\$ 2,522.21	\$ 2,030.48	\$ 4,552.69	
Suffolk Import Running Horse Simulcast 0131	\$ 54,208.12			\$ 54,208.12	\$ -		\$ 4,617.48	\$ 4,617.48	
Suffolk Racing Running Horse Live 0131	\$ 1,866.24			\$ 1,866.24	\$ -			\$ -	
Suffolk Promotional Fund Beginning Balance 7205	\$ -			\$ -	82,095.54			\$ 82,095.54	
TVG Live 0131	\$ 100.85			\$ 100.85	\$ -			\$ -	
TVG Simulcast 0131	\$ 45,779.53			\$ 45,779.53	\$ -	\$ 6,395.17	\$ 4,801.44	\$ 11,196.61	
Twin Spires Live 0131	\$ 48.63			\$ 48.63	\$ -			\$ -	
Twin Spires Simulcast 0131	\$ 28,161.18			\$ 28,161.18	\$ -	\$ 3,895.51	\$ 2,834.18	\$ 6,729.69	
Xpress Bets Live 0131	\$ 28.60			\$ 28.60	\$ -			\$ -	
Xpress Bets Simulcast 0131	\$ 13,867.46			\$ 13,867.46	\$ -		\$ 1,344.53	\$ 1,344.53	
NYRA Live 0131	\$ -			\$ -	\$ -	\$ -		\$ -	

NYRA Simulcast 0131	\$	-	\$	-	\$	-	\$	-	\$	-
Grand Total		\$190,571.03	\$0.00	\$0.00	\$190,571.03	\$82,095.54	\$12,812.89	\$18,240.67	\$113,149.10	

Row Labels	Budget Projections				Actuals				
	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	July	August	Actuals To Date Total	%Spent	
10500022									
TT LOANS AND SPECIAL PAYMENTS	\$ 525,500.00	\$ -	\$ -	\$ 525,500.00			\$ -	0%	

Revenues	Revenue Projections				Actuals			
	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Apvd Adjmts)	FY17 Beginning Balance	July	August	Actuals Total
Plainridge Import Suffolk Simulcast 0131	\$ 100,662.78		\$ -	\$ 100,662.78	\$ -		\$ 9,613.32	\$ 9,613.32
Raynham Import Suffolk Simulcast 0131	\$ 78,597.18		\$ -	\$ 78,597.18	\$ -	\$ 8,883.12	\$ 8,200.53	\$ 17,083.65
Suffolk Import Running Horse Simulcast 0131	\$ 177,470.92		\$ -	\$ 177,470.92	\$ -		\$ 18,311.48	\$ 18,311.48
Suffolk Racing Running Horse Live 0131	\$ 6,129.71		\$ -	\$ 6,129.71	\$ -			\$ -
Suffolk Capital Improvement Fund Beginning Balance 7205	\$ -		\$ -	\$ -	\$ 846,341.76			\$ 846,341.76
TVG Live 0131	\$ 279.86		\$ -	\$ 279.86	\$ -			\$ -
TVG Simulcast 0131	\$ 172,972.00		\$ -	\$ 172,972.00	\$ -	\$ 28,707.68	\$ 16,923.93	\$ 45,631.61
Twin Spires Live 0131	\$ 124.80		\$ -	\$ 124.80	\$ -			\$ -
Twin Spires Simulcast 0131	\$ 83,514.94		\$ -	\$ 83,514.94	\$ -	\$ 19,308.87	\$ 10,299.45	\$ 29,608.32
Xpress Bets Live 0131	\$ 101.42		\$ -	\$ 101.42	\$ -			\$ -
Xpress Bets Simulcast 0131	\$ 46,749.67		\$ -	\$ 46,749.67	\$ -		\$ 4,950.36	\$ 4,950.36
NYRA Live 0131	\$ -		\$ -	\$ -	\$ -			\$ -
NYRA Simulcast 0131	\$ -		\$ -	\$ -	\$ -			\$ -
Grand Total	\$666,603.28	\$0.00	\$0.00	\$666,603.28	\$846,341.76	\$56,899.67	\$68,299.07	\$971,540.50

Row Labels	Budget Projections				Actuals			
	Initial Projection	Approved Adjustments	Proposed Adjustments	Current Budget (Initial+Bal Fwd+Apvd Adjmts)	July	August	Actuals To Date Total	%Spent
10500140								
TT LOANS AND SPECIAL PAYMENTS	\$ 1,150,000.00	\$ -	\$ -	\$ 1,150,000.00			\$ -	0%

QRY--Step 16A Budget Amendment Requests by Qtr and Object Class

Amendments for Quarter: **1**

Approp	Type	Obj Class	Division	Obj Code	Description of Change	Date Requested	Apvrd	Denied	Date Approved	Approved Denied By	Comments	Change Amount
10500001	Amendment	AA	5000	A01	Move to JJ for Temp services zero sum	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$7,500.00)
Apvd/Pending Subtotal												(\$7,500.00)
Obj Class Totals												(\$7,500.00)
		BB	1400	B01	Move out of state travel to E41 Travel agent costs	8/25/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$6,000.00)
			1500	B01	Out of State Reimbursements	9/12/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$10,000.00
			1800	B02	In State Travel Reimbursement/T Passes	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$3,900.00
Apvd/Pending Subtotal												\$7,900.00
Obj Class Totals												\$7,900.00
		CC	1600	C04	Intern carry over	9/12/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$2,500.00
Apvd/Pending Subtotal												\$2,500.00
Obj Class Totals												\$2,500.00
		EE	1600	E02	Printing of marketing items	8/25/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$2,000.00
			1800	E02	Move to B02 zero sum change	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$3,900.00)
			1400	E41	Conferences & Training travel agent costs	8/25/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$6,000.00
			1600	E41	Travel Agent Expenses	8/25/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$1,000.00
			1600	EE2	Move money to printing & travel agent expenses	8/25/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$3,000.00)
Apvd/Pending Subtotal												\$2,100.00
Obj Class Totals												\$2,100.00
		HH	1700	H23	Move to JJ for appropriate object code	9/1/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$20,000.00)
			1700	H23	Increased Budget by \$10,000	9/1/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$10,000.00
			1800	HH3	National Video moved to JJ object class	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				(\$30,000.00)
Apvd/Pending Subtotal												(\$40,000.00)

Amendments for Quarter: **1**

Approp	Type	Obj Class	Division	Obj Code	Description of Change	Date Requested	Aprvd	Denied	Date Approved	Approved Denied By	Comments	Change Amount
Obj Class Totals												(\$40,000.00)
JJ												
		5000	J01		Moved from AA to cover costs	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$7,500.00
		1700	J62		Using appropriate object Code	9/1/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$20,000.00
		1800	JJ2		National Video zero sum change	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$30,000.00
Apvd/Pending Subtotal												\$57,500.00
Obj Class Totals												\$57,500.00
KK												
		5000	K07		Freight Costs for Gaming Tables	9/15/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$7,000.00
Apvd/Pending Subtotal												\$7,000.00
Obj Class Totals												\$7,000.00
UU												
		1400	U10		Emerson Newtork Power for Liebert Backup Power	9/8/2016	<input type="checkbox"/>	<input type="checkbox"/>				\$2,980.00
Apvd/Pending Subtotal												\$2,980.00
Obj Class Totals												\$2,980.00
Type Totals												\$32,480.00
Appropriation Totals												\$32,480.00

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	\$98,731.59	\$113,731.59	\$15,000.00	\$128,731.59	\$371,358.30	22.74%	25.74%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$2,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,000.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$175,881.61	\$0.00	\$27,663.90	\$27,663.90	\$0.00	\$27,663.90	\$148,217.71	15.73%	15.73%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$134,089.64	\$0.00	\$33,466.36	\$33,466.36	\$92,221.90	\$125,688.26	\$8,401.38	24.96%	93.73%	21.92%
			GG	ENERGY COSTS AND SPACE RENTAL	\$1,193,902.62	\$0.00	\$295,359.60	\$295,359.60	\$904,703.02	\$1,200,062.62	(\$6,160.00)	24.74%	100.52%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$125,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$125,000.00	0.00%	0.00%	21.92%
			JJ	OPERATIONAL SERVICES	\$2,000.00	\$0.00	\$118.00	\$118.00	\$2,632.00	\$2,750.00	(\$750.00)	5.90%	137.50%	21.92%
			KK	EQUIPMENT PURCHASE	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
			LL	EQUIPMENT LEASE-MAINTAIN/REPAR	\$29,683.80	\$0.00	\$159.00	\$159.00	\$10,941.00	\$11,100.00	\$18,583.80	0.54%	37.39%	21.92%
			UU	IT Non-Payroll Expenses	\$1,900.00	\$0.00	\$827.85	\$827.85	\$6,011.48	\$6,839.33	(\$4,939.33)	43.57%	359.96%	21.92%
			Total:	Division of Finance and Administration	\$2,164,547.56	\$0.00	\$456,326.30	\$471,326.30	\$1,031,509.40	\$1,502,835.70	\$661,711.86	21.77%	69.43%	21.92%
		1100		Human Resources										
			AA	REGULAR EMPLOYEE COMPENSATION	\$460,718.51	\$0.00	\$41,145.21	\$41,145.21	\$0.00	\$41,145.21	\$419,573.30	8.93%	8.93%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$1,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,000.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$222,453.52	\$0.00	\$11,323.32	\$11,323.32	\$0.00	\$11,323.32	\$211,130.20	5.09%	5.09%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$17,653.00	\$0.00	\$8,169.52	\$8,169.52	\$13,424.00	\$21,593.52	(\$3,940.52)	46.28%	122.32%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$5,000.00	\$0.00	\$0.00	\$0.00	\$1,580.02	\$1,580.02	\$3,419.98	0.00%	31.60%	21.92%
			JJ	OPERATIONAL SERVICES	\$19,750.00	\$0.00	\$1,870.00	\$1,870.00	\$730.00	\$2,600.00	\$17,150.00	9.47%	13.16%	21.92%
			Total:	Human Resources	\$726,575.03	\$0.00	\$62,508.05	\$62,508.05	\$15,734.02	\$78,242.07	\$648,332.96	8.60%	10.77%	21.92%
		1200		Office of the General Counsel										
			AA	REGULAR EMPLOYEE COMPENSATION	\$496,797.94	\$0.00	\$87,192.03	\$87,192.03	\$0.00	\$87,192.03	\$409,605.91	17.55%	17.55%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$6,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,500.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$165,543.17	\$0.00	\$24,039.86	\$24,039.86	\$0.00	\$24,039.86	\$141,503.31	14.52%	14.52%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$25,000.00	\$0.00	\$10,976.20	\$10,976.20	\$16,398.15	\$27,374.35	(\$2,374.35)	43.90%	109.50%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$659,603.14	\$0.00	\$197,041.42	\$197,041.42	\$112,457.19	\$309,498.61	\$350,104.53	29.87%	46.92%	21.92%
			JJ	OPERATIONAL SERVICES	\$10,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,000.00	0.00%	0.00%	21.92%

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	\$1,363,444.25	\$0.00	\$319,249.51	\$319,249.51	\$128,855.34	\$448,104.85	\$915,339.40	23.41%	32.87%	21.92%
		1300		Executive Director										
			AA	REGULAR EMPLOYEE COMPENSATION	\$378,640.38	\$0.00	\$66,439.56	\$66,439.56	\$0.00	\$66,439.56	\$312,200.82	17.55%	17.55%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$8,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,000.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$133,167.82	\$0.00	\$18,281.86	\$18,281.86	\$0.00	\$18,281.86	\$114,885.96	13.73%	13.73%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$25,000.00	\$0.00	\$9,898.01	\$9,898.01	\$6,450.61	\$16,348.62	\$8,651.38	39.59%	65.39%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$260,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$260,000.00	0.00%	0.00%	21.92%
			Total:	Executive Director	\$804,808.20	\$0.00	\$94,619.43	\$94,619.43	\$6,450.61	\$101,070.04	\$703,738.16	11.76%	12.56%	21.92%
		1400		Information Technology										
			AA	REGULAR EMPLOYEE COMPENSATION	\$563,295.91	\$0.00	\$92,767.51	\$92,767.51	\$0.00	\$92,767.51	\$470,528.40	16.47%	16.47%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$15,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$15,000.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$198,111.17	\$0.00	\$25,528.87	\$25,528.87	\$0.00	\$25,528.87	\$172,582.30	12.89%	12.89%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$52,783.00	\$0.00	\$29,688.35	\$29,688.35	\$9,186.75	\$38,875.10	\$13,907.90	56.25%	73.65%	21.92%
			GG	ENERGY COSTS AND SPACE RENTAL	\$28,000.00	\$0.00	\$7,739.74	\$7,739.74	\$19,260.26	\$27,000.00	\$1,000.00	27.64%	96.43%	21.92%
			UU	IT Non-Payroll Expenses	\$3,625,696.18	\$0.00	\$282,260.43	\$282,260.43	\$2,730,540.48	\$3,012,800.91	\$612,895.27	7.78%	83.10%	21.92%
			Total:	Information Technology	\$4,482,886.26	\$0.00	\$437,984.90	\$437,984.90	\$2,758,987.49	\$3,196,972.39	\$1,285,913.87	9.77%	71.32%	21.92%
		1500		Commissioners										
			AA	REGULAR EMPLOYEE COMPENSATION	\$884,653.65	\$0.00	\$155,322.60	\$155,322.60	\$0.00	\$155,322.60	\$729,331.05	17.56%	17.56%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$0.00	\$0.00	\$911.21	\$911.21	\$0.00	\$911.21	(\$911.21)	#Div/0!	#Div/0!	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$311,132.69	\$0.00	\$42,740.19	\$42,740.19	\$0.00	\$42,740.19	\$268,392.50	13.74%	13.74%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$56,200.00	\$205.20	\$23,555.15	\$23,760.35	\$42,348.57	\$66,108.92	(\$9,908.92)	42.28%	117.63%	21.92%
			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%	21.92%
			JJ	OPERATIONAL SERVICES	\$54,600.00	\$0.00	\$350.00	\$350.00	\$54,250.00	\$54,600.00	\$0.00	0.64%	100.00%	21.92%
			Total:	Commissioners	\$1,356,586.34	\$205.20	\$222,879.15	\$223,084.35	\$96,598.57	\$319,682.92	\$1,036,903.42	16.44%	23.57%	21.92%
		1600		Office of Workforce, Supplier and Diversity Development										
			AA	REGULAR EMPLOYEE COMPENSATION	\$196,642.08	\$0.00	\$27,912.69	\$27,912.69	\$0.00	\$27,912.69	\$168,729.39	14.19%	14.19%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$5,000.00	\$0.00	\$642.05	\$642.05	\$0.00	\$642.05	\$4,357.95	12.84%	12.84%	21.92%

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	\$0.00	\$0.00	\$3,023.30	\$3,023.30	\$0.00	\$3,023.30	(\$3,023.30)	#Div/0!	#Div/0!	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$69,159.02	\$0.00	\$7,721.60	\$7,721.60	\$0.00	\$7,721.60	\$61,437.42	11.16%	11.16%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$35,000.00	\$205.20	\$2,523.50	\$2,728.70	\$7,191.55	\$9,920.25	\$25,079.75	7.80%	28.34%	21.92%
			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%	21.92%
			PP	STATE AID/POL SUB	\$225,000.00	\$0.00	(\$15,000.00)	(\$15,000.00)	\$0.00	(\$15,000.00)	\$240,000.00	-6.67%	-6.67%	21.92%
			Total:	Office of Workforce, Supplier and Diversity D	\$580,801.10	\$205.20	\$26,823.14	\$27,028.34	\$7,191.55	\$34,219.89	\$546,581.21	4.65%	5.89%	21.92%
		1700		Office of Research and Problem Gambling										
			AA	REGULAR EMPLOYEE COMPENSATION	\$322,465.30	\$0.00	\$31,835.80	\$31,835.80	\$0.00	\$31,835.80	\$290,629.50	9.87%	9.87%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$9,000.00	\$0.00	\$1,176.84	\$1,176.84	\$0.00	\$1,176.84	\$7,823.16	13.08%	13.08%	21.92%
			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%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$113,745.03	\$0.00	\$8,176.32	\$8,176.32	\$0.00	\$8,176.32	\$105,568.71	7.19%	7.19%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$25,719.00	\$0.00	\$10,716.52	\$10,716.52	\$5,234.34	\$15,950.86	\$9,768.14	41.67%	62.02%	21.92%
			FF	FACILITY OPERATIONAL EXPENSES	\$500.00	\$0.00	\$0.00	\$0.00	\$100.00	\$100.00	\$400.00	0.00%	20.00%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$1,437,500.00	\$0.00	\$117,651.50	\$117,651.50	\$1,043,436.26	\$1,161,087.76	\$276,412.24	8.18%	80.77%	21.92%
			JJ	OPERATIONAL SERVICES	\$0.00	\$0.00	\$0.00	\$0.00	\$12,000.00	\$12,000.00	(\$12,000.00)	#Div/0!	#Div/0!	21.92%
			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%	21.92%
			PP	STATE AID/POL SUB	\$2,455,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,455,000.00	0.00%	0.00%	21.92%
			UU	IT Non-Payroll Expenses	\$215,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$215,000.00	0.00%	0.00%	21.92%
			Total:	Office of Research and Problem Gambling	\$4,638,929.33	\$0.00	\$171,668.98	\$171,668.98	\$1,060,770.60	\$1,232,439.58	\$3,406,489.75	3.70%	26.57%	21.92%
		1800		Office of Communications										
			AA	REGULAR EMPLOYEE COMPENSATION	\$209,210.02	\$0.00	\$36,731.53	\$36,731.53	\$0.00	\$36,731.53	\$172,478.49	17.56%	17.56%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$73,579.17	\$0.00	\$10,107.24	\$10,107.24	\$0.00	\$10,107.24	\$63,471.93	13.74%	13.74%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$35,000.00	\$0.00	\$21,337.34	\$21,337.34	\$13,150.30	\$34,487.64	\$512.36	60.96%	98.54%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$55,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$55,000.00	0.00%	0.00%	21.92%
			KK	EQUIPMENT PURCHASE	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
			Total:	Office of Communications	\$372,789.19	\$0.00	\$68,176.11	\$68,176.11	\$13,150.30	\$81,326.41	\$291,462.78	18.29%	21.82%	21.92%
		1900		Ombudsman										

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	\$55,308.46	\$55,308.46	\$0.00	\$55,308.46	\$259,286.20	17.58%	17.58%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$110,642.94	\$0.00	\$15,218.97	\$15,218.97	\$0.00	\$15,218.97	\$95,423.97	13.76%	13.76%	21.92%
			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%	21.92%
			JJ	OPERATIONAL SERVICES	\$10,000.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00	\$5,000.00	0.00%	50.00%	21.92%
			PP	STATE AID/POL SUB	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
			Total:	Ombudsman	\$485,237.60	\$0.00	\$70,527.43	\$70,527.43	\$5,000.00	\$75,527.43	\$409,710.17	14.53%	15.57%	21.92%
		5000		Investigations Enforcement										
			AA	REGULAR EMPLOYEE COMPENSATION	\$1,724,526.32	\$0.00	\$242,880.01	\$242,880.01	\$0.00	\$242,880.01	\$1,481,646.31	14.08%	14.08%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$19,000.00	\$0.00	\$1,057.07	\$1,057.07	\$0.00	\$1,057.07	\$17,942.93	5.56%	5.56%	21.92%
			CC	SPECIAL EMPLOYEES	\$100,000.00	\$0.00	\$36,747.50	\$36,747.50	\$0.00	\$36,747.50	\$63,252.50	36.75%	36.75%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$611,299.22	\$0.00	\$65,768.11	\$65,768.11	\$0.00	\$65,768.11	\$545,531.11	10.76%	10.76%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$194,000.00	\$0.00	\$51,993.24	\$51,993.24	\$85,610.96	\$137,604.20	\$56,395.80	26.80%	70.93%	21.92%
			HH	CONSULTANT SVCS (TO DEPTS)	\$0.00	\$0.00	\$20,206.97	\$20,206.97	\$503,293.39	\$523,500.36	(\$523,500.36)	#Div/0!	#Div/0!	21.92%
			JJ	OPERATIONAL SERVICES	\$3,045,335.78	\$0.00	\$219,976.52	\$219,976.52	\$2,390,673.70	\$2,610,650.22	\$434,685.56	7.22%	85.73%	21.92%
			UU	IT Non-Payroll Expenses	\$12,000.00	\$0.00	\$0.00	\$0.00	\$750.00	\$750.00	\$11,250.00	0.00%	6.25%	21.92%
			Total:	Investigations Enforcement	\$5,706,161.32	\$0.00	\$638,629.42	\$638,629.42	\$2,980,328.05	\$3,618,957.47	\$2,087,203.85	11.19%	63.42%	21.92%
		7000		Licensing										
			AA	REGULAR EMPLOYEE COMPENSATION	\$390,569.51	\$0.00	\$69,549.41	\$69,549.41	\$0.00	\$69,549.41	\$321,020.10	17.81%	17.81%	21.92%
			BB	REGULAR EMPLOYEE RELATED EXPEN	\$7,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,500.00	0.00%	0.00%	21.92%
			DD	PENSION & INSURANCE RELATED EX	\$137,458.27	\$0.00	\$19,143.29	\$19,143.29	\$0.00	\$19,143.29	\$118,314.98	13.93%	13.93%	21.92%
			EE	ADMINISTRATIVE EXPENSES	\$16,000.00	\$0.00	\$5,556.67	\$5,556.67	\$10,386.95	\$15,943.62	\$56.38	34.73%	99.65%	21.92%
			Total:	Licensing	\$551,527.78	\$0.00	\$94,249.37	\$94,249.37	\$10,386.95	\$104,636.32	\$446,891.46	17.09%	18.97%	21.92%
	Total:	10500001			\$23,234,293.96	\$410.40	\$2,663,641.79	\$2,679,052.19	\$8,114,962.88	\$10,794,015.07	\$12,440,278.89	11.53%	46.46%	21.92%
	10500003													
		1000		Division of Finance and Administration										
			AA	REGULAR EMPLOYEE COMPENSATION	\$24,808.99	\$0.00	\$4,357.80	\$4,357.80	\$0.00	\$4,357.80	\$20,451.19	17.57%	17.57%	21.92%

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														
	1000	Division of Finance and Administration												
		DD	PENSION & INSURANCE RELATED EX		\$8,725.32	\$0.00	\$1,233.74	\$1,233.74	\$0.00	\$1,233.74	\$7,491.58	14.14%	14.14%	21.92%
	Total:	Division of Finance and Administration			\$33,534.31	\$0.00	\$5,591.54	\$5,591.54	\$0.00	\$5,591.54	\$27,942.77	16.67%	16.67%	21.92%
	1100	Human Resources												
		AA	REGULAR EMPLOYEE COMPENSATION		\$20,887.31	\$0.00	\$1,082.50	\$1,082.50	\$0.00	\$1,082.50	\$19,804.81	5.18%	5.18%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$2,156.54	\$0.00	\$297.28	\$297.28	\$0.00	\$297.28	\$1,859.26	13.79%	13.79%	21.92%
	Total:	Human Resources			\$23,043.85	\$0.00	\$1,379.78	\$1,379.78	\$0.00	\$1,379.78	\$21,664.07	5.99%	5.99%	21.92%
	1200	Office of the General Counsel												
		AA	REGULAR EMPLOYEE COMPENSATION		\$7,590.34	\$0.00	\$1,364.64	\$1,364.64	\$0.00	\$1,364.64	\$6,225.70	17.98%	17.98%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$2,669.52	\$0.00	\$375.50	\$375.50	\$0.00	\$375.50	\$2,294.02	14.07%	14.07%	21.92%
	Total:	Office of the General Counsel			\$10,259.86	\$0.00	\$1,740.14	\$1,740.14	\$0.00	\$1,740.14	\$8,519.72	16.96%	16.96%	21.92%
	1300	Executive Director												
		AA	REGULAR EMPLOYEE COMPENSATION		\$9,321.15	\$0.00	\$1,675.82	\$1,675.82	\$0.00	\$1,675.82	\$7,645.33	17.98%	17.98%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$3,278.25	\$0.00	\$461.14	\$461.14	\$0.00	\$461.14	\$2,817.11	14.07%	14.07%	21.92%
	Total:	Executive Director			\$12,599.40	\$0.00	\$2,136.96	\$2,136.96	\$0.00	\$2,136.96	\$10,462.44	16.96%	16.96%	21.92%
	1400	Information Technology												
		AA	REGULAR EMPLOYEE COMPENSATION		\$9,735.42	\$0.00	\$1,765.05	\$1,765.05	\$0.00	\$1,765.05	\$7,970.37	18.13%	18.13%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$3,423.95	\$0.00	\$485.77	\$485.77	\$0.00	\$485.77	\$2,938.18	14.19%	14.19%	21.92%
	Total:	Information Technology			\$13,159.37	\$0.00	\$2,250.82	\$2,250.82	\$0.00	\$2,250.82	\$10,908.55	17.10%	17.10%	21.92%
	1500	Commissioners												
		AA	REGULAR EMPLOYEE COMPENSATION		\$30,868.79	\$0.00	\$5,549.80	\$5,549.80	\$0.00	\$5,549.80	\$25,318.99	17.98%	17.98%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$10,856.55	\$0.00	\$1,527.11	\$1,527.11	\$0.00	\$1,527.11	\$9,329.44	14.07%	14.07%	21.92%
	Total:	Commissioners			\$41,725.34	\$0.00	\$7,076.91	\$7,076.91	\$0.00	\$7,076.91	\$34,648.43	16.96%	16.96%	21.92%
	3000	Racing Division												
		AA	REGULAR EMPLOYEE COMPENSATION		\$280,432.22	\$0.00	\$52,093.35	\$52,093.35	\$0.00	\$52,093.35	\$228,338.87	18.58%	18.58%	21.92%
		BB	REGULAR EMPLOYEE RELATED EXPEN		\$12,000.00	\$0.00	\$1,185.94	\$1,185.94	\$0.00	\$1,185.94	\$10,814.06	9.88%	9.88%	21.92%
		CC	SPECIAL EMPLOYEES		\$330,000.00	\$0.00	\$112,036.04	\$112,036.04	\$0.00	\$112,036.04	\$217,963.96	33.95%	33.95%	21.92%
		DD	PENSION & INSURANCE RELATED EX		\$105,139.01	\$0.00	\$15,772.27	\$15,772.27	\$51,618.80	\$67,391.07	\$37,747.94	15.00%	64.10%	21.92%

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														
	3000	Racing Division												
	EE	ADMINISTRATIVE EXPENSES			\$32,855.00	\$0.00	\$16,132.67	\$16,132.67	\$30,415.05	\$46,547.72	(\$13,692.72)	49.10%	141.68%	21.92%
	FF	FACILITY OPERATIONAL EXPENSES			\$2,000.00	\$0.00	\$0.00	\$0.00	\$500.00	\$500.00	\$1,500.00	0.00%	25.00%	21.92%
	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%	21.92%
	JJ	OPERATIONAL SERVICES			\$238,300.00	\$0.00	\$58,055.38	\$58,055.38	\$126,128.00	\$184,183.38	\$54,116.62	24.36%	77.29%	21.92%
	LL	EQUIPMENT LEASE-MAINTAIN/REPAR			\$3,500.00	\$0.00	\$0.00	\$0.00	\$500.00	\$500.00	\$3,000.00	0.00%	14.29%	21.92%
	MM	PURCHASED CLIENT/PROGRAM SVCS			\$235,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$235,000.00	0.00%	0.00%	21.92%
	UU	IT Non-Payroll Expenses			\$78,700.00	\$0.00	\$14,283.29	\$14,283.29	\$33,406.71	\$47,690.00	\$31,010.00	18.15%	60.60%	21.92%
	Total:	Racing Division			\$1,342,926.23	\$0.00	\$269,558.94	\$269,558.94	\$242,568.56	\$512,127.50	\$830,798.73	20.07%	38.14%	21.92%
Total:	10500003				\$1,477,248.36	\$0.00	\$289,735.09	\$289,735.09	\$242,568.56	\$532,303.65	\$944,944.71	19.61%	36.03%	21.92%
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!	21.92%
	Total:	Racing Division			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
Total:	10500013				\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
10500021														
	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!	21.92%
	Total:	Racing Division			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
Total:	10500021				\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
10500022														
	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!	21.92%
	Total:	Racing Division			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%
Total:	10500022				\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	#Div/0!	#Div/0!	21.92%

**Commonwealth of Massachusetts
Supplier Diversity Program
FY16 Benchmarks Calculation Form
TEMPLATE**

Instructions: The tables below are populated automatically based on data entered on Worksheets 3-6.

Dept. Total By Sources of Funding	Fiscal Year 2016 - Department Total				
	Appropriation Amount	Exempted Amount	IE Amount	ISA Amount	Discretionary Amount
State	\$0	\$0	\$0	\$0	\$0
Federal	\$0	\$0	\$0	\$0	\$0
Trust	\$15,644,805	\$1,311,560	\$3,401,513	\$2,211,435	\$8,720,297
Capital	\$0	\$0	\$0	\$0	\$0
FY2016 Total	\$15,644,805	\$1,311,560	\$3,401,513	\$2,211,435	\$8,720,297

Column 1	Column 2	Column 3	Encumbered	Spent
MINORITY-OWNED BUSINESS BENCHMARK				
FY16 Discretionary Budget	FY16 Benchmark	FY16 Departmental Benchmark		
8,720,297	7%	610,421		585,733
WOMEN-OWNED BUSINESS BENCHMARK				
FY16 Discretionary Budget	FY16 Benchmark	FY16 Departmental Benchmark		
8,720,297	13%	1,133,639		1,205,772
SMALL BUSINESS BENCHMARK				
FY16 Discretionary Budget	FY16 Benchmark	FY16 Departmental Benchmark		
8,720,297	3.3%	287,770		1,886,744
SERVICE-DISABLED VETERAN-OWNED BUSINESS BENCHMARK				
FY16 Discretionary Budget	FY16 Benchmark	FY16 Departmental Benchmark		
8,720,297	3.0%	261,609		

Revised 10/07/2015

**Commonwealth of Massachusetts
Supplier Diversity Program
FY16 Benchmarks Calculation Form
TEMPLATE**

Instructions: The tables below are populated automatically based on data entered on Worksheets 3-6.

Dept. Total By Sources of Funding	Fiscal Year 2017 - Department Total				
	Appropriation Amount	Exempted Amount	IE Amount	ISA Amount	Discretionary Amount
State	\$0	\$0	\$0	\$0	\$0
Federal	\$0	\$0	\$0	\$0	\$0
Trust	\$10,990,019	\$430,785	\$3,181,140	\$420,179	\$6,957,915
Capital	\$0	\$0	\$0	\$0	\$0
FY2016 Total	\$10,990,019	\$430,785	\$3,181,140	\$420,179	\$6,957,915

Column 1	Column 2	Column 3
MINORITY-OWNED BUSINESS BENCHMARK		
FY17 Discretionary Budget	FY17 Benchmark	FY17 Departmental Benchmark
6,957,915	7%	487,054
WOMEN-OWNED BUSINESS BENCHMARK		
FY17 Discretionary Budget	FY17 Benchmark	FY17 Departmental Benchmark
6,957,915	13%	904,529
SMALL BUSINESS BENCHMARK		
FY17 Discretionary Budget	FY17 Benchmark	FY17 Departmental Benchmark
6,957,915	3.3%	229,611
SERVICE-DISABLED VETERAN-OWNED BUSINESS BENCHMARK		
FY17 Discretionary Budget	FY17 Benchmark	FY17 Departmental Benchmark
6,957,915	3.0%	208,737

Revised 10/07/2015

Commonwealth of Massachusetts
 Supplier Diversity Program
 FY16 Benchmarks Calculation Form
 TEMPLATE

Worksheet 2: Excluded/Exempt Object Codes

Dept Name:

Instructions: The following Object Classes are exempt from discretionary budget calculations:

- AA-Payroll
- BB-Employee Expense
- CC-Student Interns
- DD-Health Care
- PP-Grants
- RR-Scholarships
- SS-Debt payment
- TT-Loans
- GG- Rent

Any additional exclusions must be done by specific Object Code and justified below.

Object Code	Object Code Name	Amount	Reason for Exclusion
H19	Management Consultants	\$ 180,000.00	This is a multi-year procurement that is non-discretionary.
U02	Telecommunications-Voice	\$ 105,785.00	This is for phone services which is non-discretionary.
M03	Purchased Human Services	\$ 145,000.00	Legislatively mandated payments

**Commonwealth of Massachusetts
Supplier Diversity Program
FY16 Benchmarks Calculation Form
TEMPLATE**

Worksheet 9: Trust Account Detail

Dept Name:

Instructions: Complete the table below for each appropriation. Copy and paste copies of the table to add appropriations.

Appropriation (Account)	Object Class (Subsidiary)	Appropriation Amount	Exempted Amount	IE Amount	ISA Chargebacks	FY17 Discretionary Dollar Amount
1050-0001						\$0
	EE	\$616,445		\$23,247	\$113,894	\$479,304
	FF	\$500				\$500
	HH	\$2,692,103	\$180,000			\$2,512,103
	JJ	\$3,141,336		\$2,995,336	\$133,500	\$12,500
	LL	\$29,684				\$29,684
	MM	\$40,000				\$40,000
UU	\$3,854,596	\$105,785	\$162,557	\$102,785	\$3,483,469	
Appropriation Total		\$10,374,664	\$285,785	\$3,181,140	\$350,179	\$6,557,560

Appropriation (Account)	Object Class (Subsidiary)	Appropriation Amount	Exempted Amount	IE Amount	ISA Chargebacks	FY17 Discretionary Dollar Amount
1050-0003						\$0
	EE	\$32,855				\$32,855
	FF	\$2,000				\$2,000
	HH	\$25,000				\$25,000
	JJ	\$238,300				\$238,300
	LL	\$3,500				\$3,500
	MM	\$235,000	\$145,000		\$70,000	\$20,000
UU	\$78,700				\$78,700	
Appropriation Total		\$615,355	\$145,000	\$0	\$70,000	\$400,355

\$10,990,019 \$430,785 \$3,181,140 \$420,179 \$6,957,915

PUBLIC MEETING



101 FEDERAL STREET - 12TH FLOOR

**PLEASE CHECK IN AT
THE SECURITY DESK**



MEMORANDUM

TO: Massachusetts Gaming Commission / State Racing Division
FROM: Doug O'Donnell, Senior Financial Analyst
SUBJECT: Request for Consideration, Suffolk Downs Capital Improvement Trust Fund
DATE: September 22, 2016

In accordance with General Laws of Massachusetts, Chapter 128A, Section 5g.

The trustees may expand without appropriation all or any part of the capital trust fund to the appropriate track licensee in proportion to the amount deposited in each fund for use of a capital expenditure for alterations, additions, replacements, changes, improvements or major repairs to or upon the property owned or leased by the licensee and used by it for the conduct of racing, but not for the cost of maintenance or of other ordinary operations. The trustees shall hire architectural and engineering consultants as they deem appropriate to advise them and to evaluate proposed capital improvements. The following capital fund requests have been reviewed.

Project # SDCITF2012:

• # 14	\$75,999.39
• # 15	\$6,049.79
• # 16	\$4,200.00
• # 17	\$5,606.69
• # 18	\$5,500.00
• # 19	\$2,319.36
• # 22	\$4,500.00
• #23	<u>\$3,293.75</u>

Total Request for Consideration \$107,468.98

Current balance in Fund \$623,233.76

All financial statements required under section 6 shall be accompanied by a statement signed under the pains and penalties of perjury by the manager of the licensee setting forth the capital improvements completed with funds obtained under this section.

After review and confirmation of request, with your authorization, we will approve scope of work to be completed at the licensee facility.



Massachusetts Gaming Commission



Division of Racing

MEMORANDUM

TO:	Massachusetts Gaming Commission / State Racing Division
FROM:	Doug O'Donnell, Senior Financial Analyst
SUBJECT:	Request for Consideration, Suffolk Downs Capital Improvement Trust Fund
DATE:	September 22, 2016

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Total Request for Consideration \$107,468.98

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After review and confirmation of request, with your authorization, we will approve scope of work to be completed at the licensee facility.



Massachusetts Gaming Commission



**DIXON SALO
ARCHITECTS
INCORPORATED**

**Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal**

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-14
Dormitory Repairs
Request for Consideration

2016 AUG 31 PM 2:31
MASSACHUSETTS GAMING
COMMISSION

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$75,999.39 for the repairs to Dormitories A, B, C and D at Suffolk Downs.

The project involved the repairs to Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The repairs were required to pass the Farm Labor Camp inspection by the Commonwealth of Massachusetts. The work was performed by in-house labor and amounted to \$48,412.83. Materials and supplies purchases amounted to \$27,586.56.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$79,999.39.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.


Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-14 (RFC)

Project SD 2012-13 \$59,034.47
Barn Repairs

This project involved, as we have done in the past, the rehabilitation of Barn #14. The in-house labor charge amounted to the sum of \$46,196.30 and supplies and materials totaled \$12,838.17.

Project SD 2012-14 \$75,999.39
Dormitory Repairs

This project involved the repair of Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The in-house labor charge totaled the amount of \$48,412.83 and supplies and materials were in the sum of \$27,586.56. Repairs were needed to pass the Farm Labor Camp inspection for the Commonwealth of Massachusetts.

Project SD 2012-15 \$6,049.79
Compressor, Gear Reducer

This project involved the purchase of stock to repair 2 ice machines in the barn area and the purchase of a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring, water seal. The ice machines are necessary for the care of the horses in the stable area.

Project SD 2012-18 \$5,500.00
2005 Chevy Pick-Up

This project was necessary to replace the 1991 Chevy Pick-Up and was used for general maintenance projects at the track.

Project SD 2012-19 \$2,319.36
Barn, Track, Road Street Lights

This project involved the purchase of stock to repair the exterior lighting at the track which was needed for security and safety.

Project SD 2012-22 \$4,500.00
1988 Dodge Pick-Up

This project was necessary to replace the 1993 Ford Pick-Up that was inoperable due to the engine failure. This vehicle was used for plowing and general maintenance projects at the track.



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-14 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-14 (Dormitory Repairs).

This project involved the rehabilitation of the dormitories. We employed in-house labor and purchased the materials with regard to this matter.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



**DIXON SALO
ARCHITECTS
INCORPORATED**

**Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal**

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-15
Compressor, Gear Reducer
Request for Consideration

2016 AUG 31 PM 2:31

MASSACHUSETTS GAMING
COMMISSION

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$6,049.79 for the purchase of a compressor, gear reducer and other equipment necessary to repair two ice machines in the barn area at Suffolk Downs.

The project involved the purchase of materials and equipment necessary to repair two ice machines in the barn area. The ice machines are necessary for the care of the horses in the stable. The purchase included a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring and water seal.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$6,049.79.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.


Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs

Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-15 (RFC)

Project SD 2012-13 \$59,034.47
Barn Repairs

This project involved, as we have done in the past, the rehabilitation of Barn #14. The in-house labor charge amounted to the sum of \$46,196.30 and supplies and materials totaled \$12,838.17.

Project SD 2012-14 \$75,999.39
Dormitory Repairs

This project involved the repair of Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The in-house labor charge totaled the amount of \$48,412.83 and supplies and materials were in the sum of \$27,586.56. Repairs were needed to pass the Farm Labor Camp inspection for the Commonwealth of Massachusetts.

Project SD 2012-15 \$6,049.79
Compressor, Gear Reducer

This project involved the purchase of stock to repair 2 ice machines in the barn area and the purchase of a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring, water seal. The ice machines are necessary for the care of the horses in the stable area.

Project SD 2012-18 \$5,500.00
2005 Chevy Pick-Up

This project was necessary to replace the 1991 Chevy Pick-Up and was used for general maintenance projects at the track.

Project SD 2012-19 \$2,319.36
Barn, Track, Road Street Lights

This project involved the purchase of stock to repair the exterior lighting at the track which was needed for security and safety.

Project SD 2012-22 \$4,500.00
1988 Dodge Pick-Up

This project was necessary to replace the 1993 Ford Pick-Up that was inoperable due to the engine failure. This vehicle was used for plowing and general maintenance projects at the track.



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-15 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-15 (Compressor, Gear Reducer).

This project was necessary to repair the compressor, gear reducer at the track.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016

2. Association Making This Request Suffolk Downs

3. Project # 2012-15 (unique project number)

4. Project Compressor, Gear Reducer unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration RFR / Request for Reimbursement

Capital Improvement Fund Promotional Trust Fund


6. Total Project Amount Requested: \$ 6,049.79 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This project was necessary to repair the compressor, gear reducer at the track.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official:  Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____



ABCO - SOMERVILLE BRANCH
10 FIRST AVENUE
SOMERVILLE, MA 02143
Phone: 617-625-5500 Fax: 617-627-9797

SO INVOICE

UPC VENDOR 000000	INVOICE DATE 02/01/12	ORDER NO 12091131-00
P.O. NO 12526		Page # 2
REFERENCE		

BILL TO: STERLING SUFFOLK RACE COURSE
 111 Waldemar Ave
 East Boston MA 02128-1035

REMIT PAYMENT TO:

Long Island City-Main Office
 49-70 31st St.
 Long Island City, NY 11101-3193
 Phone: 718-937-9000 Fax: 718-433-0436

CUST # 99660834

Brooklyn NY 718-257-5700	Bronx NY 718-401-1001
Hauspaugue NY 631-234-5500	Hicksville NY 516-938-8400
Kenilworth NJ 908-931-0700	Lona Island City NY 800-786-2075
Manhattan NY 212-929-8400	New Castle DE 302-328-0400
NE Phil PA 215-673-2300	Center City Phil PA 215-922-0200
Stamford CT 203-325-9000	Somerville MA 617-625-5500
Staten Island NY 718-273-0200	Suffen NY 845-357-3322
Totowa NJ 973-812-6500	White Plains NY 914-946-2020

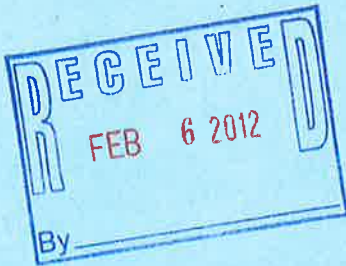
SHIP TO: STERLING SUFFOLK RACE COURSE
 111 WALDEMAR AVE.

EAST BOSTON, MA 02128

INSTRUCTIONS		TERMS
		Net 30 Days
SHIP POINT	SHIP VIA	SHIPPED
ABCO / SOMERVILLE BRANCH	Pick Up	02/01/12

Line No.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY SHIPPED	QTY U/M	UNIT PRICE	TAX	AMOUNT (NET)
14	VENDOR SCOTPT A38071-022 AUGER-15" LONG	1	0	1	EA	541.52	Y	541.52
16	VENDOR SCOTPT 02-3371-01 RESERVOIR	6	0	6	EA	102.45	Y	614.70

13 Lines Total	Qty Shipped Total	39	Subtotal	5693.92
			Taxes	355.87
			Invoice Total	6049.79
			Due	6049.79



Vendor Number: ABCO001
 Distribution: 1505-100
 Voucher Number: 104668
 Check Code: _____
 Approved By: _____

[Handwritten Signature]

ALL SALES ARE SUBJECT TO AND EXPRESSLY CONDITIONED UPON ABCO'S STANDARD TERMS AND CONDITIONS OF SALES & WARRANTY AS SET FORTH AT WWW.ABCOHVACR.COM

ABCO's Commitment: *Pride Only In Exceeding Each Customer's Highest Expectations!*

Visit us online at www.ABCOHvacr.com

Date Printed: 02/01/12
 Time Printed: 21:19
 Taken By: jcar
 # of Times Printed:

[Handwritten Signature]

RECEIVED BY	DATE RECEIVED



ABCO - SOMERVILLE BRANCH
10 FIRST AVENUE
SOMERVILLE, MA 02143
Phone: 617-625-5500 Fax: 617-627-9797

SO INVOICE

UPC VENDOR 000000	INVOICE DATE 02/01/12	ORDER NO 12091131-00
P.O. NO 12526		Page # 1
REFERENCE		



BILL TO: STERLING SUFFOLK RACE COURSE
 111 Waldemar Ave
 East Boston MA 02128-1035

REMIT PAYMENT TO

Long Island City-Main Office
 49-70 31st St.
 Long Island City, NY 11101-3193
 Phone: 718-937-9000 Fax: 718-433-0436

Brooklyn NY	718-257-5700	Bronx NY	718-401-1001
Hempstead NY	631-234-5500	Hicksville NY	516-938-8400
Kenilworth NJ	908-931-0700	Long Island City NY	800-786-2075
Manhattan NY	212-929-8400	New Castle DE	302-328-0400
NE Phil PA	215-673-2300	Center City Phil PA	215-922-0200
Stamford CT	203-325-9000	Somerville MA	617-625-5500
Staten Island NY	718-273-0200	Suffen NY	845-357-3322
Totowa NJ	973-812-6500	White Plains NY	914-946-2020

CUST # 99660834

SHIP TO: STERLING SUFFOLK RACE COURSE
 111 WALDEMAR AVE.

 EAST BOSTON, MA 02128

INSTRUCTIONS		TERMS
		Net 30 Days
SHIP POINT	SHIP VIA	SHIPPED
ABCO / SOMERVILLE BRANCH	Pick Up	02/01/12

Line No.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY SHIPPED	QTY U/M	UNIT PRICE	TAX	AMOUNT (NET)
1	18-8768-22 COMPRESSOR VENDOR SCOTPT S/N: 11F566494	1	0	1	EA	984.02	Y	984.02
2	11-0488-21 THERMO EXPANSION VALVE VENDOR SCOTPT	3	0	3	EA	182.59	Y	547.77
4	A34505-020 BREAKER & BEARING VENDOR SCOTPT	2	0	2	EA	571.30	Y	1142.60
5	02-3128-20 COVER VENDOR SCOTPT	6	0	6	EA	33.61	Y	201.66
6	19-0529-01 SILASTIC SEALANT VENDOR SCOTPT	3	0	3	EA	21.09	Y	63.27
7	A33220-022 GEAR REDUCE VENDOR SCOTPT	1	0	1	EA	1148.49	Y	1148.49
8	A32379-029 SEAL VENDOR SCOTPT	3	0	3	EA	24.42	Y	73.26
9	13-0868-01 WATER SHED ALT VENDOR SCOTPT	3	0	3	EA	20.14	Y	60.42
10	A36808-001 TUBE BEARIN GREASE VENDOR SCOTPT	1	0	1	EA	33.88	Y	33.88
11	13-0617-54 O RING VENDOR SCOTPT	6	0	6	EA	6.22	Y	37.32
13	02-0929-23 WATER SEAL VENDOR SCOTPT	3	0	3	EA	81.67	Y	245.01

ALL SALES ARE SUBJECT TO AND EXPRESSLY CONDITIONED UPON ABCO'S STANDARD TERMS AND CONDITIONS OF SALES & WARRANTY AS SET FORTH AT WWW.ABCOHVACR.COM

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Visit us online at www.ABCOHvacr.com

Date Printed: 02/01/12
 Time Printed: 21:19
 Taken By: jcar
 # of Times Printed:

Mon Jan 20 12 01:23:12 EST 16:17

RECEIVED BY	DATE RECEIVED



ABCOR - SOMERVILLE BRANCH
 10 FIRST AVENUE
 SOMERVILLE, MA 02143
 Phone: 617-625-5500 Fax: 617-627-9797

ACKNOWLEDGEMENT

UPC VENDOR	ACK DATE	ORDER NO.
000000	01/10/12	12091131-00
TAKEN BY	P.O. NO.	PAGE #
jcar	12526	1
REFERENCE		

CUST #: 99660834

SHIP TO: STERLING SUFFOLK RACE COURSE
 111 WALDEMAR AVE.

EAST BOSTON, MA 02128

CORRESPONDENCE TO: ABCOR - SOMERVILLE BRANCH
 10 FIRST AVENUE
 SOMERVILLE, MA 02143
 Phone: 617-625-5500 Fax: 617-627-9797

BILL TO: STERLING SUFFOLK RACE COURSE
 111 WALDEMAR AVE.

EAST BOSTON, MA 02128

INSTRUCTIONS		TERMS
		Net 30 Days
SHIP POINT	SHIP VIA	SHIPPED
ABCOR - SOMERVILLE BRANCH	Pick Up	01/20/12

LINE NO.	PRODUCT AND DESCRIPTION	QUANTITY ORDERED	QUANTITY B.O.	QTY. SHIPPED	QTY. U/M	UNIT PRICE	AMOUNT (NET)
1	18-8768-22 COMPRESSOR	1	0	1	EA	984.02	984.02
2	11-0488-21 THERMO EXPANSION VALVE	3	0	3	EA	182.59	547.77
4	A34505-020 BREAKER & BEARING	2	0	2	EA	571.30	1142.60
5	02-3128-20 COVER	6	0	6	EA	33.61	201.66
6	19-0529-01 SILASTIC SEALANT	3	0	3	EA	21.09	63.27
7	A33220-022 GEAR REDUCER	1	0	1	EA	1148.49	1148.49
8	A32379-029 SEAL	3	0	3	EA	24.42	73.26
9	13-0868-01 WATER SHED ALT	3	0	3	EA	20.14	60.42
10	A36808-001 TUBE BEARING GREASE	1	0	1	EA	33.88	33.88
11	13-0617-54 O RING	6	0	6	EA	6.22	37.32
13	02-0929-23 WATER SEAL	3	0	3	EA	81.67	245.01
14	A38071-022 AUGER-15" LONG	1	0	1	EA	541.52	541.52
16	02-3371-01 RESERVOIR	6	0	6	EA	102.45	614.70
13	Lines Total			Qty Shipped Total	39	Total	5693.92
						Taxes	355.87
						Invoice Total	6049.79

7025-200

ALL SALES ARE SUBJECT TO AND EXPRESSLY CONDITIONED UPON ABCOR'S STANDARD TERMS AND CONDITIONS OF SALE & WARRANTY AS SET FORTH AT WWW.ABCORHVACR.COM



PURCHASE ORDER 12566

PCF/SD

IMPORTANT: Show above order number on each Package, invoice, Bill of Lading and all Correspondence.

A packing slip **MUST** accompany this order, if shipper does not comply, this order may be returned at shipper's expense.

STERLING SUFFOLK RACECOURSE, LLC
 SUFFOLK DOWNS RACE TRACK
 111 WALDEMAR AVE.
 East Boston, MA 02128

VENDOR

ABCO

SHIP TO

DATE OF ORDER	PROJECT NO.	TERMS	F.O.B.	DELIVERY DATE	
2-2-12	Ice Machine				
QTY. ORDERED	QTY. REC'D.	CATALOG #	DESCRIPTION	UNIT PRICE	TOTAL
1.			Stock to Repair		
2.			2 Ice Machines		
3.			in Barn Area		
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					

VENDOR NOTE:

Read conditions on reverse side prior to shipment.

ACCT #
7025 200

DEPARTMENT
Mant

REQUISITIONED BY
[Signature]

EXECUTIVE OFFICER

DIRECTOR OF PURCHASING/BUYER

WHITE - VENDOR

YELLOW - CONTROLLER

PINK - OFFICE/FILE

GOLD - DEPARTMENT HEAD



PURCHASE ORDER 12526
PCF/SD _____

IMPORTANT: Show above order number on each Package, invoice, Bill of Lading and all Correspondence.

A packing slip **MUST** accompany this order, if shipper does not comply, this order may be returned at shipper's expense.

STERLING SUFFOLK RACECOURSE, LLC
SUFFOLK DOWNS RACE TRACK
111 WALDEMAR AVE.
East Boston, MA 02128

VENDOR

Abco

SHIP TO

DATE OF ORDER		PROJECT NO.		TERMS	F.O.B.	DELIVERY DATE
12-27-11		Bain Area Ice Machine				
QTY. ORDERED	QTY. REC'D.	CATALOG #	DESCRIPTION		UNIT PRICE	TOTAL
1. 1			Compressor		984.02	
2. 3			Thermal Expansive valve		152.59	
3. 6			Valves		45.76	
4. 2			Breakers + Bearings		571.30	
5. 6			Covers		33.61	
6. 5			Sealant +		31.09	
7. 3			Gear reducers		1058.16	
8. 3			Seals		24.42	
9. 3			Water shield		20.14	
10. 1			Tube Bearing grease		33.88	
11. 6			O-Ring		6.22	
12. 3			Water seal		81.67	
13.						
14.						
15.						

VENDOR NOTE:

Read conditions on reverse side prior to shipment.

ACCT #
7025-200

DEPARTMENT
Maint

REQUISITIONED BY
[Signature]

EXECUTIVE OFFICER _____

DIRECTOR OF PURCHASING/BUYER _____

WHITE - VENDOR

YELLOW - CONTROLLER

PINK - OFFICE/FILE

GOLD - DEPARTMENT HEAD



Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-16
Clean Out Drainage Ditch
Request for Consideration

MASSACHUSETTS GAMING
COMMISSION
2016 AUG 31 PM 2:31

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$4,200.00 for expenses to clean out the drainage ditch around the race track at Suffolk Downs.

The project involved the cleaning of the drainage ditch around the racetrack by a contractor retained by Suffolk Downs.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$4,200.00.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.

A handwritten signature in blue ink, appearing to read 'Neil R. Dixon'.

Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-16 (RFC)



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016

2. Association Making This Request Suffolk Downs

3. Project # 2012-16 (unique project number)

4. Project Clean Out Drainage Ditch (unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration RFR / Request for Reimbursement

Capital Improvement Fund Promotional Trust Fund

6. Total Project Amount Requested: \$ 4,200.00 Estimate / RFC Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This project involved the cleaning of the drainage ditch around the track.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official: *Chip Tuttle* Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____

Baystate Reclamation LLC

1356 Hanover Street

Hanover, MA 02339

Phone # 781-826-8388 Fax # 781-826-8358

Invoice



Date	Invoice #
5/1/2012	2012-25

Bill To
Sterling Suffolk Racecourse 111 Waldemar Avenue East Boston, MA 02128

Fed ID
6-1770376

Terms	Project
	Clean Out Drainage Ditch (12)

Description	Amount										
JOB: SUFFOLK DOWNS-CLEAN OUT DRAINAGE DITCH											
3/21/12 Mobilization	600.00										
Excavator	1,100.00										
Truck	700.00										
3/22/12 Excavator	1,100.00										
Truck	700.00										
<table border="1"> <tr> <td>Vendor Number</td> <td>BMS003</td> </tr> <tr> <td>Distribution</td> <td>1.505-100</td> </tr> <tr> <td>Voucher Number</td> <td>10.9673</td> </tr> <tr> <td>Check Code</td> <td></td> </tr> <tr> <td>Approved By</td> <td></td> </tr> </table>		Vendor Number	BMS003	Distribution	1.505-100	Voucher Number	10.9673	Check Code		Approved By	
Vendor Number	BMS003										
Distribution	1.505-100										
Voucher Number	10.9673										
Check Code											
Approved By											
Thank you for your business.	Total \$4,200.00										



SUFFOLK DOWNS®

PURCHASE ORDER 12692
PCF/SD

IMPORTANT: Show above order number on each Package, invoice, Bill of Lading and all Correspondence.

A packing slip **MUST** accompany this order. If shipper does not comply, this order may be returned at shipper's expense.

STERLING SUFFOLK RACECOURSE, LLC
SUFFOLK DOWNS RACE TRACK
111 WALDEMAR AVENUE
EAST BOSTON, MA 02128

Bay state Reclamation

V
E
N
D
O
R

S
H
I
P
T
O

DATE OF ORDER		PROJECT NO.		TERMS	F.O.B	DELIVERY DATE
<i>3-23-12</i>		<i>Race Track</i>				
QTY. ORDERED	QTY. REC'D	CATALOG #	DESCRIPTION		UNIT PRICE	TOTAL
1.			<i>Clean drainage ditch around track</i>			<i>4700.00</i>
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						

VENDOR NOTE:

Read conditions on reverse side prior to shipment.

ACCT #
CTF Environmental

DEPARTMENT
Haist

REQUISITIONED BY
JP

EXECUTIVE OFFICER

DIRECTOR OF PURCHASING/BUYER



Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

MASSACHUSETTS GAMING
COMMISSION/RACING DIVISION
2016 AUG 31 PM 2:31

RE: Suffolk Downs
CIF Project SD 2012-17
Backhoe Repairs
Request for Consideration

Dear Mr. O'Donnell:


Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$5,606.69 for repair of a backhoe at Suffolk Downs.

The project involved the labor and parts to repair the backhoe used in the maintenance of the racetrack on a daily basis. The backhoe was in need of substantial repairs due to its age and constant use.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$5,606.69.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.


Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-17 (RFC)



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-17 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-17 (Backhoe Repairs).

This project was necessary due to the age and wear and tear of the backhoe used on the track every day.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016
2. Association Making This Request Suffolk Downs

3. Project # 2012-17 (unique project number)

4. Project Backhoe Repairs unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration RFR / Request for Reimbursement

Capital Improvement Fund Promotional Trust Fund

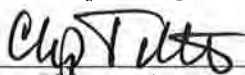
6. Total Project Amount Requested: \$ 5,606.69 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This project was necessary due to the age and wear and tear of the backhoe used on the track every day.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official:  Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____



200 Merrimac St., Woburn, MA 01801
781-935-1919 FAX 781-937-9809

Avon, MA
140 Wales Ave.
(508) 584-8484

Whately, MA
102 State Rd.
(413) 665-7009

Johnston, RI
60 Shun Pike
(401) 942-9191

REMIT TO
P.O. BOX 842615
BOSTON, MA 02284-2615

Account#	Work Ord	Br	Sls
087122	10005536	001	116

W O R K O R D E R
I N V O I C E

Date	Invoice #	Page
04-11-12	01441191	2

Sold To: 000
STERLING SUFFOLK
RACE COURSE L.P.
111 WALDEMAR AVENUE

Ship To:
STERLING SUFFOLK
RACE COURSE L.P.
111 WALDEMAR AVENUE

EAST BOSTON

MA 02128

EAST BOSTON

MA 02128

Ship Via:

Purchase order	Date	Job Number	Job Contact
	01-17-12		

WE ACCEPT VISA, MASTERCARD & AMEX

MISC. SUPPLIES/ENVIRONMENTAL C	127.10
CUSTOMER DISCOUNT 10 %	244.65-
SERVICE TRUCK FEE	150.00

MASS

MASS SALES TAX

171.45

Vendor Number	<i>Call Wood</i>
Distribution	<i>8660-200</i>
Voucher Number	<i>105702</i>
Check Code	
Approved By	

C.N. WOOD COMPANY, INC.
NO PARTS RETURNS AFTER 30 DAYS OF INVOICE.

Amount Due
Due By: 05/11/12

5,606.69

WOBURN HOURS: MONDAY - FRIDAY 6 AM TO 5 PM
SATURDAY 7 AM TO NOON



200 Merrimac St., Woburn, MA 01801
781-935-1919 FAX 781-937-9809

Avon, MA
140 Wales Ave.
(508) 584-8484

Whately, MA
102 State Rd.
(413) 665-7009



Johnston, RI
60 Shun Pike
(401) 942-9191

Account#	Work Ord	Br	Sls
087122	10005536	001	116

W O R K O R D E R
I N V O I C E

Date	Invoice #	Page
04-11-12	01441191	1

Sold To: 000
STERLING SUFFOLK
RACE COURSE L.P.
111 WALDEMAR AVENUE
EAST BOSTON MA 02128

Ship To:
STERLING SUFFOLK
RACE COURSE L.P.
111 WALDEMAR AVENUE
EAST BOSTON MA 02128

Ship Via:

Purchase order	Date	Job Number	Job Contact
	01-17-12		

WE ACCEPT VISA, MASTERCARD & AMEX

Seg# 000 Mfr:KM Model:WB140-2 S/N:F10882 Meter: 6518
Equip ID:KM2660

RONNIE 508.414.4236
SEALS ON STABILIZER LEAKING
CHECK AND REPAIR LIGHTS
2/7 DISPATCH TECH
STABILIZERS LEAKING OUT INTERNAL
REQUIRES REPLACEMENT RODS & SEALS
REQUIRES 4 WAY COMBO SW FOR LIGHTS
PARTS ON ORDER - RESCHEDULE FOR REPAIR WITH PARTS
3/19 DISPATCH TECH
REMOVE REAR STABILIZERS - REPLACE RODS AND REPACK CYLINDERS
LEFT STABILIZER HEAD REQUIRES REPLACEMENT - ORDERED PART NDA
3/20 REPLACE LEFT STABILIZER HEAD AND REASSEMBLE ALL
RUN AND TEST OPERATION - STABILIZERS COMPLETE
REMOVE AND REPLACE 4 WAY COMBO SWITCH
4/2 NEW DIRECTIONAL FLASHER INSTALLED
---REVIEW REPAIRS WITH CLIENT - COMPLETE



✓ 0 in WRMC Amt 4/30/12

Vendor Number	<i>0100-200</i>
Distribution	<i>105577</i>
Voucher Number	
AVAILABILITY	
Approved By	

	FIELD LABOR		2,542.00
2	21D-09-89140	FITTING	1.60 3.20
2	395184013	OUTRIGGER CY	613.88 1,227.76
2	500217006	BUSHING	93.61 187.22
1	500460755	HEAD	644.05 644.05
2	801476086	DOWEL	1.10 2.20
2	878000494	GASKET KIT	135.18 270.36
1	885070037	FLASHER	70.51 70.51
1	885081146	SWITCH EMERG	41.21 41.21
4	FREIGHT IN		103.57 414.28

Total for segment 5,402.79

C.N. WOOD COMPANY, INC.
NO PARTS RETURNS AFTER 30 DAYS OF INVOICE.

Back Hoe 860-200

Continued

WOBURN HOURS: MONDAY - FRIDAY 6 AM TO 5 PM
SATURDAY 7 AM TO NOON



PURCHASE ORDER 12751
PCF/SD

IMPORTANT: Show above order number on each Package, invoice, Bill of Lading and all Correspondence.
A packing slip **MUST** accompany this order. If shipper does not comply, this order may be returned at shipper's expense.

STERLING SUFFOLK RACECOURSE, LLC
SUFFOLK DOWNS RACE TRACK
111 WALDEMAR AVENUE
EAST BOSTON, MA 02128

VENDOR

C N Wood

SHIP TO

DATE OF ORDER	PROJECT NO.	TERMS	F.O.B	DELIVERY DATE
<i>4-11-12</i>	<i>Back Hoe</i>			
QTY. ORDERED	QTY. REC'D	CATALOG #	DESCRIPTION	TOTAL
1.			<i>Repair Leaking Pistons on stabilizers</i>	<i>5606.69</i>
2.				
3.			<i>Repair 4 way clasher</i>	
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				

VENDOR NOTE:

Read conditions on reverse side prior to shipment.

ACCT #
8660 200

DEPARTMENT
Maint

REQUISITIONED BY
SP

EXECUTIVE OFFICER

DIRECTOR OF PURCHASING/BUYER



**DIXON SALO
ARCHITECTS
INCORPORATED**

**Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal**

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-18
2005 Chevy Pick Up Truck
Request for Consideration

2016 AUG 31 PM 2:31
MASSACHUSETTS GAMING
COMMISSION

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$5,500.00 for the Purchase of a 2005 Chevrolet pickup truck.

The project involved the purchase of a 2005 Chevrolet C1500 pickup truck. This truck was purchased to replace a 1991 pickup truck and will be used for general maintenance project at the racetrack.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$5,500.00.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.

Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-18 (RFC)

Project SD 2012-13 \$59,034.47
Barn Repairs

This project involved, as we have done in the past, the rehabilitation of Barn #14. The in-house labor charge amounted to the sum of \$46,196.30 and supplies and materials totaled \$12,838.17.

Project SD 2012-14 \$75,999.39
Dormitory Repairs

This project involved the repair of Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The in-house labor charge totaled the amount of \$48,412.83 and supplies and materials were in the sum of \$27,586.56. Repairs were needed to pass the Farm Labor Camp inspection for the Commonwealth of Massachusetts.

Project SD 2012-15 \$6,049.79
Compressor, Gear Reducer

This project involved the purchase of stock to repair 2 ice machines in the barn area and the purchase of a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring, water seal. The ice machines are necessary for the care of the horses in the stable area.

Project SD 2012-18 \$5,500.00
2005 Chevy Pick-Up

This project was necessary to replace the 1991 Chevy Pick-Up and was used for general maintenance projects at the track.

Project SD 2012-19 \$2,319.36
Barn, Track, Road Street Lights

This project involved the purchase of stock to repair the exterior lighting at the track which was needed for security and safety.

Project SD 2012-22 \$4,500.00
1988 Dodge Pick-Up

This project was necessary to replace the 1993 Ford Pick-Up that was inoperable due to the engine failure. This vehicle was used for plowing and general maintenance projects at the track.



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-18 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-18 (2005 Chevy Pick-Up).

This truck was required for general maintenance projects at the track.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016
2. Association Making This Request Suffolk Downs

3. Project # 2012-18 (unique project number)

4. Project 2005 Chevy Pick-Up unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration RFR / Request for Reimbursement

Capital Improvement Fund Promotional Trust Fund

6. Total Project Amount Requested: \$ 5,500.00 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This truck was required for general maintenance projects at the track.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official: *Clay Tuttle* Title: Chief Operating Officer Date: July 11, 2016
Clay Tuttle

RFR approval by the Trustees (signature and date) _____



CHECK REQUEST

PAYABLE TO:

Clark Auto Sales

TODAY'S DATE:

9-19-12

DATE REQUIRED

ASAP

CHECK AMOUNT:

\$ 5,500.00

REASON:

Used 2005 Chevrolet
C1500 Pick up

REQUESTED BY:

J. Pini

APPROVED BY:

VENDOR #
DISTRIBUTION #
VOUCHER #
CHECK CODE
APPROVED BY

CI RR 108
1505-100
108375

MOTOR VEHICLE PURCHASE CONTRACT

BY AND BETWEEN

CLARK AUTO SALES

54 Water St. E. Weymouth, MA 02189
781-340-1100 781-335-3323

Bill of Sale

AND Sterling Suffolk Racecourse, LLC hereinafter designated "Purchaser"
of 111 WALDEN AVENUE EAST BOSTON, MA 02128

"The above named seller agrees to sell the hereinafter mentioned and described automobile and the above named purchaser agrees to purchase said automobile upon the following conditions, it being agreed by both parties hereto that this contract embodies all terms and conditions of sale."

ODOMETER	MAKE AND TYPE OF CAR	MODEL	YEAR	SERIAL NO. OR IDENTIFICATION NO.	COLOR
33,990	Chevrolet	C1500	2005	TIGCEC14X95Z312346	Blue
Cash Price of Car		\$5,500	-	Cash on Delivery of Car	\$
Less Trade in Allowance		\$		Cash on Account with order	\$
Make				Balance	\$
Motor No.				FINANCE CHARGE %PER YEAR	\$
Serial No.				Includes	
Total		\$5,500	-	Insurance	
Documentary Fee		\$		Title not 23932312	
Sales Tax		\$		Total Balance	\$
Total Cash Price		\$5,500	-	Payable at rate of \$	per month for months

Remarks: _____

"The purchaser agrees to pay the seller the sum of \$ _____ on delivery of this agreement, receipt of which is hereby acknowledged, and to pay to the seller the balance due on or before _____, 20____ or purchaser hereby agrees to forfeit said amount to the seller as and for liquidated damage for his breach. Title will not pass to purchaser until payment in full has been made. If final payment is made by check, title will not pass until check is paid." The purchaser certifies that he is twenty-one years of age and has full legal capacity to enter into this agreement, and that the car he is trading in is free and clear of all encumbrances whatsoever.

Dated SEPTEMBER 17, 2012

Accepted [Signature]
By _____

Final Settlement of Bill Must Be in Cash or Certified Check

Sold subject to approval of an Executive of the Company _____

Delivery Accepted _____, 20____ Purchaser's Signature _____



Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-19
Barn, Track, Road Street Lights
Request for Consideration

MASSACHUSETTS GAMING
COMMISSION
2016 AUG 31 PM 2:32

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$2,319.36 for the purchase of street lights.

The project involved the purchase of two street light fixtures, These fixtures will be used for stock to replace defective light fixtures in order to maintain security and safety in barn, track and road areas.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$2,319.36.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.



Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-19 (RFC)

Project SD 2012-13 \$59,034.47
Barn Repairs

This project involved, as we have done in the past, the rehabilitation of Barn #14. The in-house labor charge amounted to the sum of \$46,196.30 and supplies and materials totaled \$12,838.17.

Project SD 2012-14 \$75,999.39
Dormitory Repairs

This project involved the repair of Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The in-house labor charge totaled the amount of \$48,412.83 and supplies and materials were in the sum of \$27,586.56. Repairs were needed to pass the Farm Labor Camp inspection for the Commonwealth of Massachusetts.

Project SD 2012-15 \$6,049.79
Compressor, Gear Reducer

This project involved the purchase of stock to repair 2 ice machines in the barn area and the purchase of a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring, water seal. The ice machines are necessary for the care of the horses in the stable area.

Project SD 2012-18 \$5,500.00
2005 Chevy Pick-Up

This project was necessary to replace the 1991 Chevy Pick-Up and was used for general maintenance projects at the track.

Project SD 2012-19 \$2,319.36
Barn, Track, Road Street Lights

This project involved the purchase of stock to repair the exterior lighting at the track which was needed for security and safety.

Project SD 2012-22 \$4,500.00
1988 Dodge Pick-Up

This project was necessary to replace the 1993 Ford Pick-Up that was inoperable due to the engine failure. This vehicle was used for plowing and general maintenance projects at the track.



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-19 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-19 (Barn, Track, Road Street Lights)

This project was required for better exterior lighting for security and safety.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016

2. Association Making This Request Suffolk Downs

3. Project # 2012-19 (unique project number)

4. Project Barn, Track, Road Street Lights unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration

RFR / Request for Reimbursement

Capital Improvement Fund

Promotional Trust Fund

6. Total Project Amount Requested: \$ 2,319.36 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This project was required for better exterior lighting for security and safety.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official: Chip Tuttle Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____



INDEPENDENT ELECTRIC SUPPLY

Your Complete Electrical Wholesale Source!

INDEPENDENT ELECTRIC SUPPLY
41 INNER BELT RD.
SOMERVILLE MA 02143
617-625-5155 Fax 617-625-0563



INVOICE

INVOICE DATE	INVOICE NUMBER
10/29/12	S1577551.001
PLEASE REMIT PAYMENT TO:	
INDEPENDENT ELECTRIC SUPPLY 41 INNER BELT ROAD SOMERVILLE, MA 02143	

535 1 AT 0.374 E0059X I0103 D574259184 P1231880 0001:0001



SUFFOLK DOWNS CORP
111 WALDEMAR AVE
BOSTON MA 02128-1035

Ship To

SUFFOLK DOWNS CORP
111 WALDEMAR AVENUE
E BOSTON MA 02128

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALESPERSON	
1712	12779		DAN GRAY	
WRITER	SHIP VIA		SHIP DATE	ORDER DATE
TOM DAY	DIRECT		10/29/12	09/17/12
DESCRIPTION	ORDER QTY	SHIP QTY	UNIT PRICE	EXT PRICE
LSI DBR2-NW-R3-480V-4B-PCR-GR *** Above not returnable ini ** CODE ELIGIBLE FOR A \$100/PER FIXTURE REBATE FROM NSTAR	2	2	1091.463E	2182.93
<p><i>Street lights</i> <i>J.P. [Signature]</i></p> <p><i>IND 001</i> <i>1505-100</i> <i>109411</i></p>				
<p>Email Invoicing Now Available!!!</p> <p>Get your invoices quickly and help save a tree with Independent Electric Supply's email invoicing service. Invoices are emailed in an easy-to-read PDF format.</p> <p>Email bgray@iesbuy.com and get setup today!</p>				

Invoice is due by 11/28/12.

PLEASE NOTE OUR NEW REMIT-TO ADDRESS INDEPENDENT ELECTRIC SUPPLY 41 INNER BELT ROAD SOMERVILLE, MA 02143

All returns are subject to inspection and restocking charge. Past due invoices may be subject to 1.5% late charge.



Subtotal	2182.93
S&H Chgs	
Sales Tax	136.43
Amount Due	2319.36



INDEPENDENT ELECTRIC SUPPLY

Your Complete Electrical Wholesale Source!

**41 INNER BELT RD.
SOMERVILLE MA 02143
617-625-5155 Fax 617-625-0563**

Quotation

QUOTE DATE		QUOTE NUMBER	
09/17/12		S1577551	
ORDER TO:			PAGE NO.
INDEPENDENT ELECTRIC SUPPLY 41 INNER BELT RD. SOMERVILLE MA 02143 617-625-5155 Fax 617-625-0563			1

QUOTE TO:
SUFFOLK DOWNS CORP
111 WALDEMAR AVENUE
E BOSTON, MA 02128

SHIP TO:
SUFFOLK DOWNS CORP
111 WALDEMAR AVENUE
E BOSTON, MA 02128

CUSTOMER NUMBER	CUSTOMER ORDER NUMBER	RELEASE NUMBER	SALES PERSON	
1712			DAN GRAY	
ORDER		SHIP TO	SHIP DATE	FREIGHT ALLOWED
TOM DAY		BID	09/17/12	No
ORDER QTY	PART NO.	DESCRIPTION	UNIT PRICE	EXT.
2ea	175417	LSI DBR2-NW-R3-480V-4B-PCR-GR *** Above not returnable ini ** CODE ELIGIBLE FOR A \$100/PER FIXTURE REBATE FROM NSTAR TAXES NOT INCLUDED	1091.463/ea	2182.93
PRICING IS SUBJECT TO CHANGE WITH CURRENT MARKET CONDITIONS. FREIGHT AND FUEL SURCHARGES MAY APPLY.			Subtotal	2182.93
			S&H CHGS	0.00
			Amount Due	2182.93



PURCHASE ORDER 12779
PCF/SD

IMPORTANT: Show above order number on each Package, invoice, Bill of Lading and all Correspondence.
A packing slip **MUST** accompany this order. If shipper does not comply, this order may be returned at shipper's expense.

STERLING SUFFOLK RACECOURSE, LLC
SUFFOLK DOWNS RACE TRACK
111 WALDEMAR AVENUE
EAST BOSTON, MA 02128

V
E
N
D
O
R

Independent Electric

S
H
I
P
T
O

DATE OF ORDER	PROJECT NO.	TERMS	F.O.B	DELIVERY DATE	
<i>9/20/12</i>	<i>Street Stock Lights</i>			<i>11/5/12</i>	
QTY. ORDERED	QTY. REC'D	CATALOG #	DESCRIPTION	UNIT PRICE	TOTAL
1.					
<i>2</i>			<i>LST OBR2 - NW - R3 - 480V - YB - PCR - GR</i>		
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					

VENDOR NOTE:
Read conditions on reverse side prior to shipment.

7505-100
ACCT #
7015-0400

DEPARTMENT
Maint.

REQUISITIONED BY
[Signature]

EXECUTIVE OFFICER

DIRECTOR OF PURCHASING/BUYER



**DIXON SALO
ARCHITECTS
INCORPORATED**

**Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal**

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-22
1988 Dodge Pick-Up
Request for Consideration

2016 AUG 31 PM 2:32

MASSACHUSETTS GAMING
COMMISSION

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$4,500.00 for the purchase of a 1988 Dodge Pick-Up truck.

The project involved the purchase of a 1988 Dodge D-150 Pickup Truck. This truck was purchased to replace the 1993 Ford Pickup truck which was inoperable due to engine failure. This truck will be used for snow plowing and general maintenance projects at the track.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$4,500.00.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.


Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-22 (RFC)

Project SD 2012-13 \$59,034.47
Barn Repairs

This project involved, as we have done in the past, the rehabilitation of Barn #14. The in-house labor charge amounted to the sum of \$46,196.30 and supplies and materials totaled \$12,838.17.

Project SD 2012-14 \$75,999.39
Dormitory Repairs

This project involved the repair of Dormitories A, B, C and D which are located in the trailers in the stable area of Suffolk Downs. The in-house labor charge totaled the amount of \$48,412.83 and supplies and materials were in the sum of \$27,586.56. Repairs were needed to pass the Farm Labor Camp inspection for the Commonwealth of Massachusetts.

Project SD 2012-15 \$6,049.79
Compressor, Gear Reducer

This project involved the purchase of stock to repair 2 ice machines in the barn area and the purchase of a compressor, thermo expansion valve, valves, breakers and bearings, covers, sealant, gear reducer, seals, water shed, tube bearing grease, O ring, water seal. The ice machines are necessary for the care of the horses in the stable area.

Project SD 2012-18 \$5,500.00
2005 Chevy Pick-Up

This project was necessary to replace the 1991 Chevy Pick-Up and was used for general maintenance projects at the track.

Project SD 2012-19 \$2,319.36
Barn, Track, Road Street Lights

This project involved the purchase of stock to repair the exterior lighting at the track which was needed for security and safety.

Project SD 2012-22 \$4,500.00
1988 Dodge Pick-Up

This project was necessary to replace the 1993 Ford Pick-Up that was inoperable due to the engine failure. This vehicle was used for plowing and general maintenance projects at the track.



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-22 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-22 (1988 Dodge Pick-Up).

The purchase of this truck was for plowing and general maintenance at the track.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016
2. Association Making This Request Suffolk Downs
3. Project # 2012-22 (unique project number)
4. Project 1988 Dodge Pick-Up (unique descriptive title of this project)
5. Type of Request (indicate RFC or RFR)

<input checked="" type="checkbox"/> RFC / Request for Consideration	<input type="checkbox"/> RFR / Request for Reimbursement
<input checked="" type="checkbox"/> Capital Improvement Fund	<input type="checkbox"/> Promotional Trust Fund
6. Total Project Amount Requested: \$ 4,500.00 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

The purchase of this truck was for plowing and general maintenance at the track.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official: Chip Tuttle Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____



CHECK REQUEST

PAYABLE TO:

Perry Sales

TODAY'S DATE:

10-2-12

DATE REQUIRED

ASAP

CHECK AMOUNT:

\$ 4500.00

REASON:

1988 Dodge pickup

REQUESTED BY:

S. Penn

APPROVED BY:

VENDOR #
DISTRIBUTION #
VOUCHER #
CHECK CODE
APPROVED BY

Perry od
1505-100
10888

Agreement and Bill of Sale

Perry Sales & Service

1702 Providence Rd. • 508-234-8197 • Northbridge, MA 01534

BY AND BETWEEN

AND Suffe Downs hereinafter designated "Purchaser"
 of Boston MA
Purchaser's Name CITY STATE

"The above named seller agrees to sell the hereinafter mentioned and described automobile and the above named purchaser agrees to purchase said automobile upon the following conditions, it being agreed by both parties hereto that this contract embodies all terms and conditions of sale."

MILEAGE	MAKE AND TYPE OF CAR	MODEL	YEAR	SERIAL NO. OR IDENTIFICATION NO.	SALESMAN
52093	Dodge	D-150	1988	1B7HD14YXJ8655818	AR
Cash Price of Car	\$			Cash on Delivery of Car	\$ 4500 ^{CD}
Less Trade in Allowance	\$			Cash on Account with order	\$
Make				Balance	\$
Motor No.				FINANCE CHARGE	% PER YEAR \$
Serial No.				Includes	
Total	\$			Insurance	
	\$				
Documentary Fee	\$			Total Balance	\$ 4500 ^{CD}
Sales Tax	\$			Payable at rate of \$	per month for months
Total Cash Price	\$			to	

Remarks: 54000 M Odometer

"The purchaser agrees to pay the seller the sum of \$ _____ on delivery of this agreement, receipt of which is hereby acknowledged, and to pay to the seller the balance due on or before _____, 20____ or purchaser hereby agrees to forfeit said amount to the seller as and for liquidated damage for his breach. Title will not pass to purchaser until payment in full has been made. If final payment is made by check, title will not pass until check is paid"

The purchaser certifies that he is twenty-one years of age and has full legal capacity to enter into this agreement, and that the car he is trading in is free and clear of all encumbrances whatsoever.

It is understood that the purchaser has examined said motor car and accepts it in its present condition, and agrees that there are no warranties or representations, expressed or implied, not specified herein, respecting the same. It is further understood that **THIS MOTOR VEHICLE IS NOT GUARANTEED** unless otherwise stated in writing on this Bill of Sale.

Dated 10/1, 2012 Accepted [Signature]
Final Settlement of Bill Must Be In Cash or Certified Check

Sold subject to approval of an Executive of the Company _____ Cust. Phone _____

Delivery Accepted _____, 20____ Purchaser's Signature _____



**DIXON SALO
ARCHITECTS
INCORPORATED**

**Neil R. Dixon, Principal
Wayne O. Salo, Principal
Jesse G. Hilgenberg, Principal**

August 29, 2016

Mr. Douglas O'Donnell, Senior Financial Analyst
Massachusetts Gaming Commission/Racing Division
101 Federal Street
Boston, MA 02110

RE: Suffolk Downs
CIF Project SD 2012-23
Message Board
Request for Consideration

2016 AUG 31 PM 2:32
MASSACHUSETTS GAMING
COMMISSION

Dear Mr. O'Donnell:

Attached please find one copy of a Request for Consideration from Suffolk Downs to the Massachusetts Gaming Commission/Racing Division in the amount of \$3,293.75 for the repairs to the Message Board at Suffolk Downs.

The project involved the repairs to the primary electronic message board sign located at McClellan Highway at the main entrance to the track.

Based upon the above, it is the opinion of this office that the project is an appropriate Capital Improvement Fund Project and we recommend that this Request for Consideration be approved by the Massachusetts Gaming Commission/Racing Division in the amount of \$3,293.75.

Should you have any questions please do not hesitate to contact this office.

Very truly yours,
DIXON SALO ARCHITECTS, INC.


Neil R. Dixon,
Principal/Architect
NRD/hs

cc: Chip Tuttle, CFO Suffolk Downs
Enclosure: Suffolk Downs, Request for Considerations CIF Project SD 2012-23 (RFC)



July 11, 2016

Mr. Neil R. Dixon
Dixon Salo Architects, Inc.
501 Park Avenue, Suite 210
Worcester, MA 01610-1221

Dear Neil:

RE: CIF Project SD 2012-23 (RFC)

Enclosed are three copies of a Request for Consideration from the Running Horse Capital Improvement Trust Fund for Project SD 2012-23 (Message Board).

This project involved the necessary repair and maintenance of the track's primary electronic sign.

Should you have any questions please call me at (617) 568-3327.

Thank you for your consideration of this matter.

Sincerely,

Chip Tuttle
Chief Operating Officer

Encs.
CT:jf

RECEIVED

JUL 18 2016

Dixon Salo Architects, Inc.

Telephone: 617-567-3900
525 McClellan Highway, East Boston, Massachusetts 02128

Made in Massachusetts



The Commonwealth of Massachusetts

MASSACHUSETTS GAMING COMMISSION

CAPITAL IMPROVEMENT TRUST FUND PROMOTIONAL TRUST FUND

101 Federal Street, 12th Floor
Boston, Massachusetts 02110
Telephone (617) 979-8400 • Fax (617) 725-0258

★ *All information must be complete before any requests (RFC or RFR) can be processed.*

1. Date July 11, 2016

2. Association Making This Request Suffolk Downs

3. Project # 2012-23 (unique project number)

4. Project Message Board (unique descriptive title of this project)

5. Type of Request (indicate RFC or RFR)

RFC / Request for Consideration

RFR / Request for Reimbursement

Capital Improvement Fund

Promotional Trust Fund

6. Total Project Amount Requested: \$ 3,293.75 Estimate / RFC ♦ Actual / RFR

7. *RFC only* – Provide a detailed description of the promotional or capital improvement project including the project objectives, how it will enhance the operations of the association and / or improve attendance and handles at your racetrack.

This project involved the necessary repair and maintenance of the track's primary electronic sign.

RFR only – Requests for reimbursement must contain a listing of all project expenditures by date, paid to and check number. A copy of the invoice and the cancelled check must support each expenditure.

8. For Capital Improvement Projects only, RFC's and RFR's must be submitted to the Commission's architect engineer consultant for review. The consultant makes recommendations to the Trustees relative to the cost and nature of the capital improvement project.

By Track Official: Chip Tuttle Title: Chief Operating Officer Date: July 11, 2016
Chip Tuttle

RFR approval by the Trustees (signature and date) _____

SCOREBOARD ENTERPRISES, INC.

P.O. Box 272

No. Easton, MA 02356

FID#042605006

Phone # 508-339-8113

Fax #


508-339-0184

INVOICE # 25562

Date

4/2/2012

Suffolk Downs
 Christian Teji
 111 Waldemar Ave.
 Boston, MA 02128-



Ship To/Remarks
 Repairs to the message display on
 3/14/12 & 3/19/12.

Job No.	P.O. No.	Account #	Our #	Terms
		1095SR		Net Upon Receipt

Item	Quantity	Description	Unit Price	Amount
Misc	3	3/14/12 - Replace three (3) power supplies on the north facing message display. Repair broken wiring inside the display		
		12v power supply	595.00	1,785.00T
Labor - 1 Man	5	One man @ 5 hrs. including travel		
		Labor - 1 Man	85.00	425.00
Misc	1	3/19/12 - Replace one (1) power supply on the north facing message display		
		12V power supply	595.00	595.00T
Labor - 1 Man	4	One man @ 4 hrs. including travel		
		Labor - 1 Man	85.00	340.00
		Sales Tax	6.25%	148.75

RECEIVED
 APR 5 2012
 By _____

Vendor Number 500001
 Distribution 8247-900
 Voucher Number 105393
 Check Code _____
 Approved By _____



THANK YOU!	Total	\$3,293.75
------------	--------------	-------------------

WE NOW ACCEPT MASTERCARD/VISA/AMEX
 FINANCE CHARGE OF 1.5% PER MONTH ADDED TO
 PAST DUE BALANCES OVER 30 DAYS



Division of Racing

MEMORANDUM

To:	Massachusetts Gaming Commission / State Racing Division
FROM:	Doug O'Donnell, Senior Financial Analyst
SUBJECT:	Local Aid Distribution
DATE:	September 22, 2016

In accordance with Section 18D of Chapter 58, local aid is payable to each city and town within which racing activities are conducted. Amounts are computed at .35 percent times amounts wagered during the quarter ended six months prior to the payment.

- Local Aid Quarterly Payment - September 30, 2016 \$165,777.32

With the Commission's authorization payments will be made to the appropriate cities and towns.



Massachusetts Gaming Commission

Massachusetts Gaming Commission / State Racing Division

Computation of Local Aid Distributions

Qtr ending 09/30/2016

	Total handles			<u>Local Aid @ .0035</u>	<u>Pay to</u>
	Jan	Feb	Mar 16'		
Suffolk Downs -					
Suffolk on track			10,254,354		
Exports			-		
TVG			11,272,371		
Xpress Bets			3,222,017		
Twin Spires			6,519,677		
			-		
Total			<u>31,268,419</u>	<u>109,439.47</u>	Boston (2/3) & Revere (1/3)
Plainridge -					
On track			7,687,021		
Exports			-		
Total			<u>7,687,021</u>	<u>26,904.57</u>	Plainville
Raynham-Taunton					
On track			7,230,848		
Exports			-		
Total			<u>7,230,848</u>	<u>25,307.97</u>	Raynham
Wonderland - @ Suffolk Location					
On track			1,178,661		
Exports			-		
Total			<u>1,178,661</u>	<u>4,125.31</u>	Boston (2/3) & Revere (1/3)
Grand total			<u>47,364,949</u>	<u>165,777.32</u>	

<u>Distributions -</u>		
City of Boston (line 1)	72,960.01	On Suffolk
City of Revere (line 1)	36,479.46	On Suffolk
City of Boston (line 2)	2,750.22	On Wonderland @ Suffolk Location
City of Revere (line 2)	1,375.09	On Wonderland @ Suffolk Location
Town of Plainville	26,904.57	On Plainridge
Town of Raynham	<u>25,307.97</u>	On Raynham-Taunton
Total	<u>165,777.32</u>	
Payments should be made to the above communities for the amounts indicated.		
Appropriation =		
Object =		
Reference	Racing local aid q/e 09/16	dao
Description		

In accordance with Section 18D of Chapter 58, local aid is payable to each city and town within which racing activities are conducted. Amounts are computed at .35 percent times amounts wagered during the quarter ended six months prior to the payment.

Wonderland

1/1/2016

1/31/2016

31

23

January 2016

Out of State Running Horse Signal	Out of State Harness Horse Signal	Import of Out Intra-State						Weekly Total
		of State Greyhound Signal	Simulcast of Suffolk (NA Suffolk)	Intra-State Plainridge	Simulcast of Plainridge	Live Racing Suffolk	Live Racing Plainridge	
\$0.00	\$0.00	\$413,622.10	\$0.00	\$0.00	\$0.00	\$0.00	\$413,622.10	
\$0.00	\$0.00	\$961.88	\$0.00	\$0.00	\$0.00	\$0.00	\$961.88	
\$0.00	\$0.00	\$44,215.00	\$0.00	\$0.00	\$0.00	\$0.00	\$44,215.00	
\$0.00	\$0.00	\$369,407.10	\$0.00	\$0.00	\$0.00	\$0.00	\$369,407.10	
Distribution to Different Funds								
\$6,900.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,900.00	
\$1,712.75	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,712.75	
\$0.00	\$0.00	\$10,340.55	\$0.00	\$0.00	\$0.00	\$0.00	\$10,340.55	
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
\$0.00	\$0.00	\$3,029.99	\$0.00	\$0.00	\$0.00	\$0.00	\$3,029.99	
\$8,612.75	\$0.00	\$13,370.54	\$0.00	\$0.00	\$0.00	\$0.00	\$21,983.29	

1/1/2016

1/31/2016

31

23

Suffolk

January

2016

Import of Out of Intra-State

State

Greyhound

Signal

Out of State

Harness Horse

Signal

\$3,313,947.00

\$75,751.70

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

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\$0.00

\$0.00

Intra-State

Simulcast of

Suffolk (NA

Suffolk)

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

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\$0.00

Live Racing

Suffolk

\$0.00

\$0.00

\$0.00

\$0.00

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\$0.00

Live Racing

Plainridge

\$0.00

\$0.00

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\$0.00

\$0.00

\$0.00

\$0.00

Monthly Total

\$3,389,698.70

\$16,775.46

\$1,181,919.00

\$2,207,779.70

Distribution to Different Funds

\$6,900.00

\$41,710.19

\$12,427.30

\$16,428.71

\$4,142.43

\$0.00

\$296.39

\$0.00

\$1,223.61

\$48,610.19

\$6,900.00

\$41,710.19

\$12,711.37

\$16,428.71

\$4,142.43

\$643.14

\$296.39

\$0.00

\$82,832.24

2/1/2016
 2/29/2016
 29
 20

Suffolk

February 2016

Import of Out of Intra-State

Out of State		Out of State		State		Simulcast of		Intra-State		Live Racing		Monthly Total
Running Horse Signal	Harness Horse Signal	Greyhound Signal	Suffolk (NA Suffolk)	Plainridg	Plainridg	Suffolk	Suffolk	Plainridg	Plainridg	Suffolk	Plainridg	
\$3,220,657.60	\$73,598.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,294,256.10
\$17,330.89	\$300.85	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$17,631.74
\$1,158,321.00	\$16,091.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,174,412.00
\$2,062,336.60	\$57,507.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,119,844.10
Distribution to Different Funds												
\$6,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,000.00
\$39,019.21	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$39,019.21
	\$275.99	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$12,353.46
\$12,077.47	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$17,330.89
\$17,330.89	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,025.82
\$4,025.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$588.39
\$0.00	\$588.39	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$287.54
\$0.00	\$287.54	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
\$33,434.18	\$1,151.92	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$79,605.31

\$45,019.21

3/1/2016

3/31/2016

31

21

Suffolk

2016

March

Import of Out of Intra-State

State

Greyhound

Signal

\$0.00

\$0.00

\$0.00

\$0.00

Distribution to Different Funds

\$0.00

\$0.00

\$342.35

\$0.00

\$0.00

\$0.00

\$0.00

\$712.17

\$359.78

\$0.00

\$1,414.30

Simulcast of

Suffolk (NA

Suffolk)

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

Intra-State

Plainridge

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

Live Racing

Suffolk

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

Plainridge

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

Live Racing

Plainridge

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

Monthly Total

\$3,570,399.50

\$18,074.06

\$1,266,122.00

\$2,304,277.50

\$6,300.00

\$41,710.19

\$13,389.00

\$17,721.67

\$4,348.88

\$712.17

\$359.78

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$0.00

\$6,300.00

\$41,710.19

\$48,010.19

2/1/2016
2/29/2016

	Out of State		Out of State		Import of Out of State		Intra-State		Intra-State		Live Racing		Weekly Total
	Running Horse Signal	Harness Horse Signal	Greyhound Signal (NA Suffolk)	Simulcast of Suffolk (NA Suffolk)	Simulcast of Plainridge	Live Racing Suffolk	Live Racing Plainridge	Simulcast of Plainridge	Live Racing Suffolk	Live Racing Plainridge	Plainridge	Plainridge	
	\$3,250,494.00	\$402,554.00			\$0.00	\$0.00	\$0.00				\$0.00	\$0.00	\$3,653,048.00
	\$18,720.00	\$1,346.00											\$20,066.00
	\$1,350,721.00	\$162,420.00											\$1,513,141.00
	\$1,899,773.00	\$240,134.00											\$2,139,907.00
Contribution to Different Funds													
	\$0.00												\$0.00
	\$0.00												\$0.00
	\$12,189.35	\$1,509.58			\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$13,698.93
	\$18,720.00												\$18,720.00
	\$4,063.12												\$4,063.12
		\$2,546.67			\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$2,546.67
		\$1,200.67			\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$1,200.67
	\$0.00	\$34,972.47			\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00	\$40,229.39

Xpress Bets

2/1/2016
2/29/2016

Out of State Running Horse Signal	Out of State Harness Horse Signal	Import of Out of State		Intra-State Simulcast of Suffolk (NA Suffolk)	Intra-State Simulcast of Plainridge	Live Racing Suffolk	Live Racing Plainridge	Weekly Total
		Greyhound Signal (NA Suffolk)	Signal (NA Suffolk)					
\$994,118.00	\$75,998.00		\$0.00			\$0.00		\$1,070,116.00
\$5,314.00	\$431.00							\$5,745.00
\$407,097.00	\$28,126.00							\$435,223.00
\$587,021.00	\$47,872.00							\$634,893.00
Distrib								
\$0.00								\$0.00
\$0.00								\$0.00
\$3,727.94	\$284.99		\$0.00			\$0.00		\$4,012.94
\$5,314.00						\$0.00		\$5,314.00
\$1,242.65	\$670.36		\$0.00			\$0.00		\$1,242.65
	\$239.36		\$0.00			\$0.00		\$670.36
\$0.00	\$1,194.71		\$0.00			\$0.00	\$0.00	\$1,194.71
\$10,284.59			\$0.00			\$0.00	\$0.00	\$11,479.30

No Documents



Division of Racing

TO: Steve Crosby, Chairman
Gayle Cameron, Commissioner
Lloyd Macdonald, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

FROM: Alexandra Lightbown, Director of Racing

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

DATE: September 19, 2016

RE: Additional Plainridge Racing Official

Dear Commissioners:

Plainridge Park Casino Director of Racing Steve O'Toole has submitted a request to be approved as fill in Judge when Annmarie Mancini is not available, which is anticipated to occur rarely. Mr. O'Toole is accredited. He is also requesting to be a back-up starter.

Recommendation: That the Commission approve the request of Steve O'Toole to be approved as fill-in Judge when Annmarie Mancini is not available, and a back-up starter if needed.



Massachusetts Gaming Commission



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



PLAINRIDGE PARK
CASINO

September 19, 2016

Alexandra Lightbown
Director of Racing
Massachusetts Gaming Commission
101 Federal St.
Boston, MA 02110

Dear Alex,

Plainridge Park Casino respectfully requests approval for Steve O'Toole to fill in from time to time as association judge and starter as needed.

Sincerely,

Steve O'Toole
Director of Racing

205 CMR 134.00: LICENSING AND REGISTRATION OF EMPLOYEES, VENDORS, JUNKET ENTERPRISES AND REPRESENTATIVES, AND LABOR ORGANIZATIONS

Section

- 134.01: Key Gaming Employee Licensees
- 134.02: Gaming Employee Licensees
- 134.03: Gaming Service Employees
- 134.04: Vendors
- 134.05: Labor Organizations
- (134.06: Junket Enterprises and Junket Representatives: Reserved)
- 134.07: Forms
- 134.08: Submission of Application
- 134.09: Investigation, Determination, and Appeals for Gaming Establishment Employees and Vendors
- 134.10: Affirmative License Standards for the Licensing of Employees and Vendors of the Gaming Establishment
- 134.11: Affirmative Registration Standards for the Registration of Employees and Vendors of the Gaming Establishment and Labor Organizations
- 134.12: Temporary Licenses
- 134.13: Fingerprinting
- 134.14: Identification
- 134.15: Fees
- 134.16: Term of Licenses
- 134.17: Renewals
- 134.18: Duties of Applicants and Licensees
- 134.19: Disciplinary Action

134.01: Key Gaming Employee Licensees

No individual shall be employed by or perform services for a gaming licensee as a key gaming employee, as defined by M.G.L. c. 23K, § 2, unless the individual has been licensed in accordance with M.G.L. c. 23K, §30 and 205 CMR 134.00. There shall be two categories of key gaming employee licensees: key gaming employee- executive and key gaming employee-standard.

(1) An individual holding one of the following positions ~~at a gaming establishment~~, and any person in a similar or equivalent position, regardless of job title, whose employment relates to gaming shall be designated as a key gaming employee- executive:

- (a) Assistant General Manager;
- (b) Chief Internal Audit Officer;
- (c) Gaming Manager;
- (d) Chief Financial Officer;
- (e) Chief of Security;
- (f) General Manager;
- (g) Chief Surveillance Officer;
- (h) Chief Compliance Officer;
- (i) Principal executive Officer;
- (j) Principal operating Officer;
- (k) Principal accounting Officer;
- (l) Chief Information Officer;
- (m) Other executive level employees who are not identified as a key gaming employee-standard in accordance with 205 CMR 134.01(2) as determined by the commission.

(2) An individual holding one of the following positions ~~at a gaming establishment~~, and any person in a similar or equivalent position, regardless of job title, whose employment relates directly to a gaming establishment shall be designated as a key gaming employee- standard:

- (a) Controller;
- (b) Electronic gaming device or slot machines manager;

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- (c) Human resources manager;
- (d) Information technology manager;
- (e) Pit boss;
- (f) Shift supervisor of table games, of a slot department, credit department, security, surveillance, accounting department, cage, or player development;
- (g) Credit manager;
- (h) Cage manager;
- (i) Hotel Manager;
- (j) Entertainment Director;
- (k) Food & Beverage Manager;
- (l) Other managerial employees who are not identified as a key gaming employee-executive in accordance with 205 CMR 134.01(1), but who are empowered to make discretionary decisions which impact gaming establishment operations, or as determined by the commission.

(3) Any individual who is a qualifier of a gaming licensee but who does not perform any of the duties of the positions identified in 205 CMR 134.01(1)(a) or (b) does not have to become licensed as a key gaming employee. Such individual does have to be approved as a qualifier and issued a positive determination of suitability in accordance with 205 CMR 111.00: *Phase 1 Application Requirements*, 115.00: *Phase 1 Suitability Determination, Standards and Procedures*, and 116.00: *Persons Required to Be Licensed or Qualified*. An individual who has been issued a positive determination of suitability in accordance with 205 CMR 111.00: *Phase 1 Application Requirements* and who will be performing the responsibilities requiring licensure as a key gaming employee shall apply for licensure in accordance with 205 CMR 134.08(2) subject to the term limitation of 205 CMR 134.16(4).

134.02: Gaming Employee Licensees

No individual shall be employed by or perform services for a gaming licensee as a gaming employee, as defined by M.G.L. c. 23K, § 2, unless the individual has been licensed in accordance with M.G.L. c. 23K, § 30 and 205 CMR 134.00. An individual holding one of the following positions ~~at a gaming establishment, and any person in a similar or equivalent position, regardless of job title, whose employment relates directly to a gaming establishment shall be designated as a gaming employee:~~

- (a) Boxpersons;
- (b) Cashiers;
- (c) Change personnel;
- (d) Clerks;
- (e) Count room personnel;
- (f) Data processing personnel;
- (g) Dealers and croupiers;
- (h) Floorpersons;
- (i) Gaming Hosts;
- (j) Internal audit and accounting personnel whose duties include reviewing, verifying, and recording gaming revenue entries, the processing or control of active accounting documents related to gaming activity, or that have access to active accounting documents related to gaming activity;
- (k) An individual who is directly connected to the operation or maintenance of a slot machine or game taking place in a gaming establishment (whether employed by the gaming licensee or a vendor licensed in accordance with 205 CMR 134.00);
- (l) Personnel authorized to extend complimentary services, including employees performing functions similar to those performed by a junket representative;
- (m) Junket representative employed by the gaming licensee or affiliate of the gaming license or a junket enterprise licensed as a gaming vendor in accordance with 205 CMR 134.00;
- (n) Personnel authorized to issue credit;
- (o) Personnel authorized to issue promotional play including persons who identify patrons or groups of patrons who shall receive complimentaries based on actual patron play, authorize such complimentaries, or determine the amount of such complimentaries;
- (p) Personnel with security administrator access to a slot machine tracking system;
- (q) Security personnel, including guards and game observers, or an employee with

knowledge of security procedures of the gaming establishment

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134.02: continued

- (r) Surveillance personnel, including surveillance equipment maintenance and repair technicians (whether employed by the gaming licensee or a vendor licensed in accordance with 205 CMR 134.00);
- (s) Any employee who conducts or participates in the conduct of gaming, who participates in the transfer or handling of chips, tokens or money, or who participates in audit or accounting functions;
- (t) Any employee whose has access to a restricted area of a gaming establishment;
- (u) A person who supervises a person required to be licensed as a gaming employee in accordance with 205 CMR 134.02;
- (v) An employee of a gaming ~~licensee establishment~~ whom the Bureau deems necessary to be licensed to ensure compliance with the M.G.L. c. 23K and 205 CMR and to protect the public and ensure the credibility and integrity of gaming in the Commonwealth.

134.03: Gaming Service Employees

(1) An individual employed ~~in a gaming establishment~~ by a gaming licensee who is not classified as a key gaming employee in accordance with 205 CMR 134.01, or a gaming employee in accordance with 205 CMR 134.02, shall be designated as a gaming service employee and shall register in accordance with 205 CMR 134.09 prior to engaging in the provision of employment services. An individual employed by a vendor of a gaming establishment for work in a gaming establishment shall be considered a gaming service employee unless otherwise specified in 205 CMR 134.02.

(2) During the pre-opening phase of a gaming establishment, and continuing for up to 30 days from the date an Operation Certificate is issued in accordance with 205 CMR, a gaming licensee may temporarily allow an individual(s) who is employed at a gaming property which is owned and/or operated by it, its parent, or an affiliated company to assist with gaming establishment employee training and related purposes for up to 60 days without those individuals having to become licensed or registered in accordance with 205 CMR 134.00, provided that the gaming licensee does the following:

- (a) Supplies the Bureau a reasonable time in advance of arrival with the name of the individual, name of the gaming property at which they are employed, the position at the gaming property at which they are employed, a description of the reason for the individual being at the gaming establishment including the services to be performed, the anticipated duration of their stay, and any other information requested by the Bureau;
- (b) Ensures all individuals performing services under 205 CMR 134.03(2) carry identification and wear a badge issued by the gaming licensee that is distinguishable from those that are issued to employees of the gaming establishment and that is clearly visible at all times while at the gaming establishment;
- (c) If the individual is licensed, certified, or otherwise approved for employment by the jurisdiction which the gaming property in which they are employed is located, an individual licensed as a key gaming employee in accordance with 205 CMR 134.00 shall attest in writing that the individual is in good standing in that jurisdiction; and
- (d) Ensures that the individual is accompanied by an individual who is licensed or registered in accordance with 205 CMR 134.00 anytime they are in a restricted area of the gaming establishment.

134.04: Vendors

No person shall conduct business with a gaming licensee as a vendor ~~to a gaming establishment~~ unless such person has been licensed as a gaming vendor, as defined by M.G.L. c. 23K, § 2, or registered as a non-gaming vendor, as defined by M.G.L. c. 23K, § 2, in accordance with 205 CMR 134.00. A person shall be considered to be conducting business upon commencement of performance of a contract or provision of a good or service.

A subcontractor to a vendor shall not be required to obtain licensure or registration under 205 CMR 134.00. For purposes of 205 CMR 134.00 a subcontractor shall be considered a person that contracts with a licensed or registered vendor to provide goods or services

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necessary to fulfill the licensed or registered vendor's contract with a gaming licensee. As part of the application process, vendors shall be required to identify all of its known or anticipated subcontractors and shall have a continuing duty to update the Bureau relative to the identification of any new subcontractors. The Bureau may, at its discretion, require the submission of additional information and documents, including but not limited to the Subcontractor Information Form as provided in 205 CMR 134.07(11).

(1) Gaming Vendors.

(a) Gaming Vendors-Primary. A person who conducts business with a gaming applicant or gaming licensee on a regular or continuing basis for provision of goods or services which directly relates to gaming, as defined by M.G.L. c. 23K, § 2, including, but not limited to a person who does any of the following, shall be designated as a gaming vendor-primary:

1. Manufactures, sells, leases, supplies, or distributes devices, machines, equipment (except gaming table layouts), accessories, or items that meet at least one of the following conditions:
 - a. are designed for use in a gaming area as defined by M.G.L. c. 23K, § 2;
 - b. are designed for use in a simulcast wagering area;
 - c. are used in connection with a game in the gaming area;
 - d. have the capacity to affect the calculation, storage, collection, electronic security, or control of the gaming revenues from a gaming establishment.
2. provides maintenance services or repairs gaming or simulcast wagering equipment, including slot machines;
3. acts as a junket enterprise; or
4. provides items or services that the Commission has determined are used in or are incidental to gaming or to an activity of a gaming facility.

Exception. Any person, by submission of a written petition, may request a determination from the commission that the person providing goods or services deemed by the Bureau to meet a description contained in 205 CMR 134.04(1)(a) need not be licensed as a Gaming Vendor-primary on the grounds that they are not providing services on a regular or continuing basis or that they do not directly relate to gaming.

(b) Gaming Vendors- Secondary. Any person who regularly conducts over \$250,000 in gross sales with any one gaming licensee within a 12 month period or a person who conducts over \$100,000 in gross sales with any one gaming licensee within a three month period, and who does not otherwise qualify for designation as a Gaming Vendor-primary in accordance with 205 CMR 134.04(1)(a), may be designated a Gaming Vendor-secondary by the ~~Commission~~ **Division of Licensing after consultation with the Bureau** regardless of the type of goods or services being provided. **The procedure for making** ~~This designation may be made either by virtue of submission of a *Business Entity Disclosure Form* Gaming Vendor secondary application by the vendor in anticipation of meeting the monetary threshold, or in accordance with 205 CMR 134.04(3).~~

(2) Non-gaming Vendors. A person who offers to a ~~gaming establishment or~~ gaming licensee goods or services which are not directly related to gaming, as defined by M.G.L. c. 23K, § 2, including, but not limited to any of the following, shall be designated as a non-gaming vendor:

- (1) construction company;
- (2) vending machine provider;
- (3) linen supplier;
- (4) garbage handler;
- (5) maintenance company;
- (6) limousine service company;
- (7) food purveyor;
- (8) supplier of alcoholic beverages;
- (9) a person that sells, distributes, tests, or repairs antique slot machines as described in M.G.L. c. 271, § 5A;
- (10) suppliers of gaming table layouts.

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(3) The Division of Licensing after consultation with the Bureau may designate a person as a gaming vendor-secondary. In making the determination to designate a vendor as a gaming vendor-secondary, the following factors may, without limitation, be considered: the total dollar amount by which the vendor's business with the gaming licensee is reasonably expected to exceed the thresholds set forth in G.L. c. 23K, § 31(c) and 205 CMR 134.04(1)(b); the relative value of the contract compared to the gaming licensee's overall disbursements to vendors; whether the goods or services are limited to the pre-opening phase of the gaming establishment; the duration of the contract; whether the vendor will be providing goods or services on-site at the gaming establishment; the number of subcontractors involved in the performance of the vendor's contract with the gaming establishment; whether the vendor is licensed, registered or certified and regulated by a governmental or quasi-governmental body or board; the nature of the goods or services; and public safety considerations. ~~shall determine upon consultation with the gaming licensee, review of the Disbursement Report required to be submitted in accordance with 205 CMR, and/or review of the terms of the agreement required to be maintained pursuant to 205 CMR whether a non-gaming vendor has met or is reasonably likely to meet the thresholds provided in 205 CMR 134.04(1)(b). If the Division of Licensing determines that the non-gaming vendor is a gaming vendor-secondary, has met or is likely to meet a threshold, it shall forward notice of such to the vendor of its obligation to submit an application for licensure as a gaming vendor-secondary. Within 45 days of service of the notice, the vendor, if already providing goods and/or services to the gaming licensee as a registrant, shall submit a completed *Business Entity Disclosure Form-gaming Vendor-Secondary* as set forth in 205 CMR 134.07(3)(b)(7) for licensure as a gaming vendor-secondary, discontinue providing the goods and/or services it is contracted to provide, file for an exemption in accordance with 205 CMR 134.04(6), or file a written request to the Division of Licensing for reconsideration from the determination requiring filing of an application for licensure as a gaming vendor-secondary on the grounds that it is not providing goods or services on a regular or continuing basis. If the vendor is not already providing goods and/or services to the gaming licensee as a registrant, it may file for an exemption in accordance with 205 CMR 134.04(6), or file a written request to the Division of Licensing for reconsideration from the determination requiring filing of an application for licensure as a gaming vendor-secondary on the grounds that it will not be providing goods and/or services on a regular or continuing basis.~~

(4) Gaming Vendor Qualifier.

(a) ~~Persons designated as gaming vendor qualifiers must establish their qualifications in accordance with 205 CMR 134.09 and 134.10.~~

(b) Gaming vendors-primary. The following persons shall be designated as a gaming vendor-primary qualifiers ~~and must establish their qualifications for licensure in accordance with 205 CMR 134.09 and 134.10:~~

1. If the gaming vendor-primary applicant is a sole proprietor: The owner.
2. If the gaming vendor-primary applicant is a corporation:
 - a. Each officer;
 - b. Each inside director and those outside directors serving on the audit or compliance committees;
 - c. Any person owning more than 5% of the common stock of a company applying for licensure as a gaming vendor-primary as provided by 205 CMR 134.04(1)(a), or a holding, intermediary or subsidiary company of such company;
 - d. Any person who will act as a sales representative or regularly engage in the solicitation of business from a licensed gaming establishment;
 - e. In the judgment of the Division of Licensing after consultation with the Bureau any person with significant and substantial responsibility for the applicant's business under the jurisdiction of the Commission. ~~in the Commonwealth.~~

134.04: continued

3. If the applicant is a limited liability corporation:
 - a. Each Member;
 - b. Each transferee of a Member's interest;
 - c. Each Manager;
 - d. In the judgment of the **Division of Licensing after consultation with the Bureau** any person with significant and substantial responsibility for the applicant's business **under the jurisdiction of the Commission** ~~in the Commonwealth.~~
 4. If the applicant is a limited partnership:
 - a. Each General Partner;
 - b. Each Limited Partner;
 - c. In the judgment of the **Division of Licensing after consultation with the Bureau** any person with significant and substantial responsibility for the applicant's **under the jurisdiction of the Commission.** ~~business in the Commonwealth.~~
 5. If the applicant is a partnership:
 - a. Each Partner;
 - b. In the judgment of the **Division of Licensing after consultation with the Bureau** any person with significant and substantial responsibility for the applicant's business **under the jurisdiction of the Commission.** ~~in the Commonwealth.~~
- (c) **Gaming vendors-secondary.**
1. If the gaming vendor-secondary applicant is a sole proprietor, the Owner shall be designated as a qualifier.
 2. If the gaming vendor-secondary applicant is a corporation, limited liability corporation, limited partnership, or partnership
 - a. Each Officer, Member, Partner or functional equivalent w expected to exercise operational control over the business under the jurisdiction of the Commission shall be designated as a qualifier;
 - b. Any person who will act as a sales representative or regularly engage in the solicitation of business from a licensed gaming establishment shall be designated as a qualifier;
 - c. Any person owning more than 5% of the common stock of a company applying for licensure as a gaming vendor-secondary shall be designated as a qualifier;
 - d. In the judgment of the **Division of Licensing after consultation with the Bureau** any person with significant and substantial responsibility for the applicant's business under the jurisdiction of the Commission shall be designated as a qualifier;
 - e. The **Division of Licensing after consultation with the Bureau** may designate any person owning more than 5% of the common stock of a holding or intermediary company of an applicant for licensure as a gaming vendor-secondary as a qualifier.
 - f. The **Division of Licensing after consultation with the Bureau** may designate any inside director or any outside director or its functional equivalent serving on the audit or compliance committees as a qualifier.
- (~~b~~) (d) In all cases, any person who, in the opinion of ~~the commission or the~~ **Division of Licensing after consultation with the Bureau**, can exercise control or provide direction to a gaming vendor or applicant for a gaming vendor license or holding, intermediary or subsidiary companies thereof may be designated a ~~Gaming Vendor~~ **gaming vendor** qualifier.
- (~~e~~) (e) **Other Qualifiers.** The ~~commission or~~ **Division of Licensing after consultation with the Bureau** may, at its discretion, require other persons that have a business association of any kind with the applicant for a gaming vendor license to be **subject to the qualification requirements as a qualifier** ~~licensed as a gaming vendor qualifier~~. These persons include, but are not limited to an affiliate or holding, intermediary or subsidiary ~~companies~~ of the applicant for a gaming vendor license.
- (~~d~~) An applicant may appeal any determination made by the Bureau in accordance with 205 CMR 134.04(4) to the commission by filing a petition on a form prescribed by the commission. The commission shall decide the appeal at a public hearing on the matter at

which it may allow representatives of the petitioner and Bureau to testify.

(5) Waiver. Upon written petition, the commission may waive the requirement to be licensed as a gaming vendor qualifier for:

(a) institutional investors holding up to 15% of the stock of the gaming vendor or applicant for a gaming vendor license, or holding, intermediary or subsidiary company thereof, upon a showing by the person seeking the waiver that it purchased the securities for investment purposes only and does not have any intention to influence or affect the affairs or operations of the gaming vendor or applicant for a gaming vendor license or a holding, intermediary or subsidiary company thereof. Provided, however, any institutional investor granted a waiver which subsequently determines to influence or affect the affairs or operations of the gaming vendor or applicant for a gaming vendor license, or a holding, intermediary thereof shall provide not less than 30 days' notice to the commission of such intent and shall file an application and be subject to the licensing requirements of 205 CMR 134.00 before taking any action that may influence or affect the affairs of the gaming vendor or applicant for a gaming vendor license or a holding, intermediary or subsidiary company. Any person holding over 15% of a gaming vendor or applicant for a gaming vendor license, or a holding, intermediary or subsidiary company thereof, shall be required to apply for a license before doing business in the Commonwealth; or

(b) Any person who, in the opinion of the Bureau or the commission, cannot exercise control or provide direction to a gaming vendor or applicant for a gaming vendor license or a holding, intermediary or subsidiary company thereof. Provided, however, a person who is not an institutional investor and who holds more than 5% of the common stock of a company, or holding, intermediary or subsidiary company of such a company may not petition for waiver in accordance with 205 CMR 134.04(5)(b).

(6) Exemptions. For purposes of 205 CMR 134.04 the following persons engaged in the following fields of commerce who provide goods or services to a gaming applicant or gaming licensee, and that are not otherwise required to be licensed as a key gaming employee, gaming employee, or gaming service employee, shall not be deemed to be conducting business for purposes of M.G.L. c. 23K, § 31 and accordingly shall not be required to obtain licensure or registration as a vendor:

- (a) insurance companies and insurance agencies;
- (b) television, radio, newspaper, internet or other similar media outlets used for advertising purposes;
- (c) transactions with a governmental entity;
- (d) ~~professional~~ legal, accounting, **lobbying** and financial services;
- (e) physicians;
- (f) labor organizations, unions, or affiliates registered in accordance with 205 CMR 134.00;
- (g) utility companies;
- (h) telecommunications companies;
- (i) training seminars, publication subscriptions, conference registration or membership dues for professional associations intended to directly contribute to the work performance or professional development of an employee;
- (j) non-profit charitable corporations or organizations, provided that no consideration is received for the contribution;
- (k) court order or stipulation of settlement or for settlement of guest losses or guest refunds
- (l) payments for freight charges to freight transporters select by the vendor for delivering goods;
- (m) professional entertainers and/or celebrity appearances;
- (n) any ~~other~~ person that, by submission of a written petition, can demonstrate to the commission that registration as a non-gaming vendor is not necessary to protect the public interest.
- (o) **Upon submission of a written certification by a gaming licensee, any person providing goods or services not directly related to gaming to whom the gaming licensee reasonably expects to pay an amount less than \$_____ within a 12-month period.**

(7) Qualification of New Qualifiers for Gaming Vendors - Primary.

(a) No person requiring qualification pursuant to 205 CMR 134.04(4)(a)(b) may perform any duties or exercise any powers relating to the position that said qualifier is seeking to assume for a Gaming Vendor - Primary licensee unless the person notifies the Bureau in writing within 30 days of appointment to the position. Such notification shall be accompanied by a completed Key Gaming Employee - Standard Application Form. Following such notification and submission of the completed Form, the person may continue to perform duties and exercise powers relating to the position pending qualification.

(b) A person with reason to believe that his or her new position with a Gaming Vendor - Primary may require qualification pursuant to 205 CMR 134.04(4)(a) shall notify the Bureau in writing within 30 days of appointment to the position. Such notification shall be accompanied by a summary of the responsibilities and/or features of the position. The Bureau shall determine whether the person shall be designated a qualifier pursuant to 205 CMR 134.04(4) and shall notify the person of such designation in writing. Within 30 days of designation as a qualifier, the person shall submit a completed Key Gaming Employee - Standard Application Form. Following submission of the completed Form, the person may continue to perform duties and exercise powers relating to the position pending qualification.

(c) The Bureau shall review the Forms submitted by the new qualifier, as well as such other information that the Bureau may request, and, upon completion of its investigation, shall make a determination or recommendation to the Commission in accordance with 205 CMR 134.09(1)(c) whether the new qualifier meets the standards for suitability.

(d) Upon notification by the Bureau of a determination that reasonable cause exists to believe the qualifier may not ultimately be found suitable, a gaming vendor licensee shall promptly remove the qualifier from his or her position until such time as the commission makes its final determination on suitability.

134.05: Labor Organizations

(1) Each labor organization, union or affiliate seeking to represent employees who are employed at a gaming establishment shall register with the Commission in accordance with 205 CMR 134.05.

(2) Within 30 days of the date on which it begins organizing activities directed at the employees who are employed in a gaming establishment, a labor organization, union or affiliate shall file with the **Bureau Division of Licensing** a labor organization registration statement in accordance with 205 CMR 134.08. Organizing activities shall include, without limitation, soliciting membership by means of any direct personal contact, or any public notices such as the posting or distribution of fliers, posters or advertisements.

~~(3) Each officer, agent or principal employee of the labor organization, union or affiliate shall file a Labor Organization Individual Disclosure Form in accordance with 205 CMR 134.08 at the time the pertinent labor organization, union or affiliate registers or should register, or within 30 days of the date on which the individual is elected, appointed or hired, whichever is later, or within such additional time as the Bureau may, upon a showing of good cause, permit.~~

~~(4) Notwithstanding 205 CMR 134.05 a Labor Organization Individual Disclosure Form need not be filed by an officer, agent or principal employee of a national or international labor organization who exercises no authority, discretion or influence over the operation of such labor organization with regard to any employment matter relating to employees who are employed in a Massachusetts gaming establishment provided that the Bureau may direct such officer to file such form or to provide any other information in the same manner and to the same extent as may be required of any other officer of a labor organization which is required to register.~~

(5) Neither a labor organization, union, or affiliate, nor its officers who are not otherwise licensed or registered as a key gaming employee, gaming employee, gaming service employee, gaming vendor, gaming vendor qualifier, or non-gaming vendor, may hold any financial interest in a gaming establishment whose employees are represented by the labor

organization, union, or affiliate.

(134.06: Junket Enterprises and Junket Representatives: Reserved

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134.07: Forms

(1) (a) **Key Gaming Employee and Gaming Employee License Application Forms**

Every individual applying for a key gaming employee license or a gaming employee license shall be obligated to complete and submit an application to the Division of Licensing. Said application forms shall be created by the Bureau, subject to the approval of the Commission. The Division of Licensing may make non-material changes to the form. The license application forms for key gaming employees and gaming employees shall require, at a minimum, the following information:

1. the name of applicant;
2. the address of applicant;
3. A detailed employment history of the applicant, as prescribed by the Bureau;
4. the fingerprints of the applicant;
5. the criminal and arrest record of the applicant; and
6. any civil judgments obtained against the applicant pertaining to antitrust or security regulation.

(b) The Bureau may require the applicant to provide additional information, as set forth in the application forms, including, but not limited to:

1. information related to the financial integrity of the applicant;
2. bank accounts and records of the applicant;
3. bank references for the applicant;
4. business and personal income and disbursement schedules of the applicant;
5. tax returns and other reports filed by government agencies regarding the applicant; and
6. business and personal accounting check records and ledgers of the applicant.

(2) **Gaming Service Employee Registration Form**

Every individual seeking to register as a Gaming Service Employee shall be obligated to complete and submit a registration form to the Division of Licensing. The registration form shall be created by the Bureau and shall request the disclosure of the information deemed necessary by the Bureau. Any changes to the gaming service employee registration form must be approved by the Director of the Bureau.

(3) **Gaming Vendor License Application Form**

(a) Every person applying for a gaming vendor license shall be obligated to complete and submit a business entity disclosure form to the Division of Licensing. Said forms shall be created by the Bureau, subject to the approval of the Commission. The Division of Licensing may make non-material changes to the form. The license application forms for gaming vendors shall require, at a minimum, the following information:

1. The name of applicant;

2. The post office address and, if a corporation, the name of the state under the laws of which it was incorporated, the location of its principal place of business and the names and addresses of its directors and stockholders;
3. The applicant's criminal and arrest record;
4. Any civil judgments obtained against the applicant pertaining to antitrust or security regulation;
5. The identity of every person having a direct or indirect interest in the business and the nature of such interest; provided, however, that if the disclosed entity is a trust, the application shall disclose the names and addresses of all beneficiaries; provided further, that if the disclosed entity is a partnership, the application shall disclose the names and addresses of all partners, both general and limited; and provided further, that if the disclosed entity is a limited liability company, the application shall disclose the names and addresses of all members
6. An independent audit report of all financial activities and interests including, but not limited to, the disclosure of all contributions, donations, loans or any other financial transactions to or from a gaming entity or operator in the past 5 years
7. Clear and convincing evidence of financial stability including, but not limited to, bank references, business and personal income and disbursement schedules, tax returns and other reports filed by governmental agencies and business and personal accounting check records and ledgers.

(b). Every person designated as a qualifier for a gaming vendor under 205 CMR 134.04(4) shall be obligated to complete and submit a disclosure form to the Division of Licensing. Said forms for gaming vendor qualifiers shall be created by the Bureau, subject to the approval of the Commission. The Division of Licensing may make non-material changes to the form.

(4) **Non-Gaming Vendor Registration Form**

Every person seeking to register as a non-gaming vendor shall be obligated to complete and submit a registration form to the Division of Licensing. The registration form shall be created by the Bureau and shall request the disclosure of any information deemed necessary by the Bureau, subject to the approval of the Commission. The Division of Licensing may make non-material changes to the form.

~~(1) Multi-jurisdictional Personal History Disclosure Form for Key Gaming Employees-Executive. The Multi-jurisdictional Personal History Disclosure Form For Key Gaming Employees-Executive shall contain the following information:~~

- ~~(a) Name, including maiden name and any aliases or nicknames and applicable dates of use;~~
- ~~(b) Date of birth;~~
- ~~(c) Physical description;~~
- ~~(d) Current address and residence history;~~
- ~~(e) Social Security Number, which information is voluntarily provided in accordance with 5 U.S.C. § 552a;~~
- ~~(f) Citizenship and, if applicable, information regarding resident alien status, including information regarding passports;~~
- ~~(g) Marital history, spouse, dependents and other family data;~~
- ~~(h) The gaming licensee or qualifier, gaming vendor licensee or qualifier or holding company, as applicable, with which the qualifier is affiliated, and the nature of the qualifier's position with or interest in such entity;~~
- ~~(i) Telephone number at the current place of employment, and home number;~~
- ~~(j) Email address;~~
- ~~(k) Employment history of the qualifier and qualifier's immediate family;~~
- ~~(l) Education and training;~~

- ~~(m) Record of military service;~~
- ~~(n) Government positions and offices presently or previously held, and the offices, trusteeships, directorships or fiduciary positions presently or previously held with any business entity;~~
- ~~(o) Trusteeships or other fiduciary positions held by the qualifier and the qualifier's spouse, and any denial or suspension of, or removal from, such positions;~~
- ~~(p) Current memberships in any social, labor or fraternal union, club or organization;~~
- ~~(q) Licenses and other approvals held by or applied for by the qualifier or, where specified, the qualifier's spouse, in the Commonwealth of Massachusetts or any other jurisdiction, as follows:~~
 - ~~1. Any professional or occupational license held by or applied for the by the qualifier or the qualifier's spouse;~~
 - ~~2. Motor vehicle registrations and operator licenses held by or applied for the by the qualifier or the qualifier's spouse, and any revocation or suspension thereof;~~
 - ~~3. Possession or ownership of any pistol or firearm, or any application for any firearm permit, firearm dealer's license, or permit to carry a pistol or firearm;~~
 - ~~4. Any license, permit, approval or registration required to participate in any lawful gambling operation in the Commonwealth of Massachusetts or any jurisdiction held by or applied for by the qualifier; and~~
 - ~~5. Any denial, suspension or revocation by a government agency of a license, permit or certification held by or applied for by the qualifier or the qualifier's spouse, or any entity in which the qualifier or the qualifier's spouse was a director, officer, partner or any owner of a 5% or greater interest.~~
- ~~(r) Any interest in or employment presently or previously held by the qualifier with any entity which has applied for a permit, license, certificate or qualification in connection with any lawful gambling or alcoholic beverage operation in the Commonwealth of Massachusetts or any other jurisdiction; and any current employment or other association by the qualifier's family with the gambling or alcoholic beverage industries in the Commonwealth of Massachusetts or any other jurisdiction;~~
- ~~(s) Civil, criminal and investigatory proceedings in any jurisdiction, as follows:~~
 - ~~1. Any arrest, indictment, charge, or conviction of the applicant;~~
 - ~~2. Any instance where the applicant has been named as a co-conspirator in a criminal proceeding or held as a material witness;~~
 - ~~3. Any appearance before, investigation by or request to take a polygraph examination by any governmental agency, court, committee, grand jury or investigatory body, and any refusal to comply with a request to do so;~~
 - ~~4. Any pardons, dismissals, suspensions or deferrals of any criminal investigation, prosecution, or conviction;~~
 - ~~5. Lawsuits to which the applicant was or is a party;~~
 - ~~6. Any citation or charge for a violation of a statute, regulation or code or any jurisdiction, other than a criminal disorderly persons, petty disorderly persons or motor vehicle violation; and~~
 - ~~7. Any use, distribution, or possession of any narcotic, hallucinogenic, drug, barbiturate, amphetamine or other substance listed in M.G.L. c. 94C other than pursuant to a valid prescription issued by a licensed physician.~~
- ~~(t) Any exclusion or barring from any casino, gaming establishment or gambling/gaming related entity in any jurisdiction;~~
- ~~(u) Financial data, as follows:~~
 - ~~1. All assets and liabilities of the applicant, and the applicant's spouse and dependent children as indicated on the net worth statement and supporting schedules in a format prescribed by the commission, including cash, bank accounts, notes payable and receivable, real estate and income taxes payable, loans, accounts payable and any other indebtedness, contingent liabilities, securities, real estate interests, real estate mortgages and liens, life insurance, pension funds, vehicles and other assets;~~
 - ~~2. Bank accounts, including any right of ownership in, control over or interest in any foreign bank account, and safe deposit boxes;~~
 - ~~3. Real estate interests held by the applicant or the applicant's spouse or dependent children;~~
 - ~~4. Businesses owned;~~
 - ~~5. Copies of federal tax returns and related information;~~
 - ~~6. Judgments or petitions for bankruptcy, insolvency or liquidation concerning the qualifier or any business entity in which the qualifier held a 5% or greater interest,~~

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~~other than a publicly traded corporation, or in which the qualifier served as an officer or director;~~

~~7. Any business entity in which the qualifier was an owner, director or officer which has been placed under some form of governmental administration or monitoring;~~

~~8. Any garnishment or attachment of wages, charging order or voluntary wage execution, including the amount, court, nature of the obligation and the holder of the obligation;~~

~~9. Any repossessions of real or personal property;~~

~~10. Any guarantees, co-signatures or insuring of payments of financial obligations of any persons or business entities;~~

~~11. Status as executor, administrator or fiduciary of any estate;~~

~~12. Life insurance policies on the applicant's life which name someone other than the applicant's family as a beneficiary;~~

~~13. Positions held, assets held, or interest received in any estate or trust;~~

~~14. Whether the applicant has ever been bonded for any purpose or been denied any type of bond, including the nature of the bond and if applicable, the reason for denial;~~

~~15. Insurance claims in excess of \$ 100,000.00 by the applicant or the applicant's spouse or dependent children;~~

~~16. Referral or finder's fees in excess of \$ 10,000.00;~~

~~17. Loans in excess of \$ 10,000.00 made or received by the applicant, the applicant's spouse or dependent children;~~

~~18. Gifts in excess of \$ 10,000.00 given or received by the applicant or the applicant's immediate family;~~

~~19. Brokerage or margin accounts with any securities or commodities dealer;~~

~~20. Currency exchanges in an amount greater than \$ 10,000.00;~~

~~21. Information regarding any instance where the applicant or any entity in which the applicant was a director, officer or holder of a 5% or greater interest has traded in foreign currencies or in a foreign commodities exchange, sold or purchased discounted promissory notes or other commercial paper, or been a party to any leasing arrangements in excess of \$ 50,000.00; and~~

~~22. Information regarding any ownership interest or financial investment by the applicant in any entity which holds or is an applicant for a license issued by the commission, or in any gambling venture which does not require licensure by the commission, including persons providing or reasonably anticipated to provide the applicant with support in the financing of such investment or interest; the extent and nature of the applicant's involvement in the management and operation of the entity; whether the applicant has or has agreed to assign, pledge or hypothecate such interest or investment, the nature and terms of any such transaction and a copy of any such agreement.~~

~~(v) The name, address, occupation and phone number of persons who can attest to the qualifier's good character and reputation;~~

~~(w) A signed, dated Statement of Truth affidavit.~~

~~(2) Massachusetts Supplement Form For Key Gaming Employees Executive. The Massachusetts Supplement Form For Key Qualifiers Gaming Employees Executive shall contain the following information:~~

~~(a) Name, including maiden name and any aliases or nicknames and applicable dates of use;~~

~~(b) Date of birth;~~

~~(c) Physical description;~~

~~(d) Current address, mailing and home, if different;~~

~~(e) Home, cell, and work telephone numbers;~~

~~(f) Social Security Number, which information is voluntarily provided in accordance with 5 U.S.C. § 552a;~~

~~(g) Whether any civil judgments have been obtained against the applicant pertaining to antitrust or security regulation;~~

~~(h) The gaming license applicant or holding company, as applicable, with which the applicant is affiliated, and the nature of the applicant's position with or interest in such entity;~~

~~(i) Citizenship and, if applicable, resident alien status, including any employment authorization with expiration date; country of which the applicant is a citizen, place of birth, port of entry to the United States, and name and addresses of sponsor(s) upon the~~

applicant's arrival;

~~(j) Whether during the last ten years any entity in which the applicant has been a director, officer, principal employee or a holder of 5% or more interest has:~~

- ~~1. Made or been charged with (either itself or through third parties acting for it) bribes or kickbacks to any government official, domestic or foreign, to obtain favorable treatment or to any company, employee or organization to obtain a competitive advantage;~~
- ~~2. Held a foreign bank account or has had authority to control disbursements from a foreign bank account;~~
- ~~3. Maintained a bank account or other account, whether domestic or foreign, which is not reflected on the books or records of the business or which is in a name other than the name of the business;~~
- ~~4. Donated, loaned or used funds or property for the use or benefit or in opposing any government, political party, candidate or committee either domestic or foreign;~~
- ~~5. Compensated any of its directors, officers or employees for time and expenses incurred in performing services for the benefit of or in opposing any government or political party domestic or foreign; or~~
- ~~6. Made any loans, donations or other disbursement to its directors, officers or employees for the purpose of making political contributions or reimbursing such individuals for political contributions whether domestic or foreign;~~
- ~~7. Copies of federal and foreign tax returns and related information for the last five years;~~
- ~~8. The name, address, occupation and phone number of persons who can attest to the qualifier's good character and reputation;~~
- ~~9. A signed, dated and notarized release authorization which shall direct all courts, law enforcement agencies, probation departments, military organizations, selective service boards, employers, education institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the qualifier as requested by the commission, the bureau or a contractor investigator;~~
- ~~10. A signed, dated Statement of Truth;~~
- ~~11. A waiver of liability as to the Commonwealth of Massachusetts and its instrumentalities and agents for any damages resulting from any disclosure and publication of information acquired during the license or investigation process; and~~
- ~~12. Consent to fingerprinting, photographing, supplying of handwriting exemplars, and any lawful inspection, search, or seizure of the applicant, licensee, or registrant while present in a gaming establishment, and/or their personal effects present in a gaming establishment conducted in accordance with 205 CMR.~~

~~(3) Key Gaming Employee Standard Application Form. A Key Gaming Employee Standard Application Form shall contain the following information:~~

- ~~(a) Name, including maiden name and any aliases or nicknames along with applicable dates of usage;~~
- ~~(b) Date and place of birth;~~
- ~~(c) Physical description;~~
- ~~(d) Current address and telephone number, and residence history for the past ten years;~~
- ~~(e) Social Security Number, which information is voluntarily provided in accordance with § 7 of the Privacy Act, 5 U.S.C. § 552a;~~
- ~~(f) Citizenship and, if applicable, resident alien status, including any employment authorization and expiration date, country of which the applicant is a citizen, place of birth, port of entry to the United States, and name and address of sponsor(s) upon the applicant's arrival;~~
- ~~(g) Reason for filing the Key Gaming Employee Standard Application Form;~~
- ~~(h) Marital history and other family data;~~
- ~~(i) Employment history, including any gaming-related employment, for the past ten years;~~
- ~~(j) Education and training;~~
- ~~(k) Record of military service;~~
- ~~(l) Licenses and other approvals held by or applied for by the applicant or, where specified, the applicant's spouse, in the Commonwealth of Massachusetts or any other jurisdiction, including;~~

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- ~~1. Any license, permit, approval or registration required to participate in any lawful gambling operation in the Commonwealth of Massachusetts or any jurisdiction;~~
 - ~~2. Any denial, suspension or revocation by a government agency in the Commonwealth of Massachusetts or any other jurisdiction of a license, permit, approval or registration held by or applied for by the applicant or the applicant's spouse; and~~
 - ~~3. Motor vehicle registrations and operator licenses held by or applied for by the applicant or the applicant's spouse, and any revocation or suspension thereof.~~
- (m) ~~Civil, criminal and investigatory proceedings in any jurisdictions, as follows:~~
- ~~1. Any arrest, indictment, charge, or conviction of the applicant;~~
 - ~~2. Any appearance before, investigation by or request to take a polygraph examination by any governmental agency, court, committee, grand jury or investigatory body;~~
 - ~~3. Lawsuits to which the applicant was or is a party in the past ten years; and~~
 - ~~4. Whether any civil judgments have been obtained against the applicant pertaining to antitrust or security regulation.~~
- (n) ~~Financial data, as follows:~~
- ~~1. All assets and liabilities of the applicant, and the applicant's spouse and dependent children as indicated on the net worth statement and supporting schedules in a format prescribed by the Commission, including cash, bank accounts, notes payable and receivable, real estate and income taxes payable, loans, accounts payable, credit card debt and any other indebtedness, contingent liabilities, securities, real estate interests, real estate mortgages and liens, life insurance, pension funds, vehicles and other assets;~~
 - ~~2. Bank accounts, including any right of ownership in, control over or interest in any foreign bank account during the last ten year period as well as with regard to safe deposit boxes;~~
 - ~~3. Real estate interests held by the applicant or the applicant's spouse or dependent children in the past ten years regardless of whether such interest was held under a recorded or unrecorded instrument;~~
 - ~~4. Any business in which the applicant has held an ownership interest for the past 20 years;~~
 - ~~5. Copies of federal and state tax returns and related information for the last five years;~~
 - ~~6. Judgments or petitions for bankruptcy or insolvency concerning the applicant or any business entity in which the applicant held a 5% or greater interest, other than a publicly traded corporation, in the past 20 years or in which the applicant served as an officer or director;~~
 - ~~7. Any garnishment or attachment of wages, charging order or voluntary wage execution, during the past ten year period including the amount, court, nature of the obligation and the name and address holder of the obligation;~~
 - ~~8. Positions held or interest received in any estate or trust during the last ten year period;~~
 - ~~9. Insurance claims in excess of \$100,000 by the applicant or the applicant's spouse or dependent children filed within the past ten year period;~~
 - ~~10. Loans in excess of \$10,000 made or received by the applicant, the applicant's spouse or dependent children in the last ten year period;~~
 - ~~11. During the last five year period, any gifts in excess of \$10,000, either individually or in the aggregate, given or received, whether tangible or intangible, by the applicant or the applicant's immediate family in any one year period; and~~
 - ~~12. Referral or finder's fees in excess of \$10,000 in the past ten years.~~
- (o) ~~The name, address, occupation and phone number of persons who can attest to the applicant's good character and reputation;~~
- (p) ~~Consent to fingerprinting, photographing, supplying of handwriting exemplars, and any lawful inspection, search, or seizure of the applicant, licensee, or registrant while present in a gaming establishment, and/or their personal effects present in a gaming establishment conducted in accordance with 205 CMR;~~
- (q) ~~A signed, dated and notarized release authorization which shall direct all courts, law enforcement agencies, probation departments, military organizations, selective service boards, employers, education institutions, banks, financial and other institutions and all~~

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~~governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the applicant as requested by the commission, the bureau or a contractor investigator; and~~
~~(f) A signed, dated Statement of Truth.~~

~~(4) Gaming Employee License Form. The *Gaming Employee License Form* shall contain the following information:-~~

- ~~(a) Name and address of the applicant;~~
- ~~(b) Detailed employment history;~~
- ~~(c) Education and training;~~
- ~~(d) Record of military service;~~
- ~~(e) Government positions and offices presently or previously held, and offices, trusteeships, directorships or fiduciary positions presently or previously held with any business entity;~~
- ~~(f) Licenses, registrations, permits, certification and other approvals held by or applied for in the Commonwealth of Massachusetts or any other jurisdiction;~~
- ~~(g) Any denial, suspension or revocation by a governmental agency of a license, registration, permit or certification held by or applied for the applicant or any entity in which the applicant a director, officer, partner or an owner of a 5% or greater interest;~~
- ~~(h) Any interest in or employment presently or previously held by the applicant with an entity which has applied for a permit, license, certificate or qualification in connection with any lawful gambling or alcoholic beverage operation in the Commonwealth of Massachusetts or any other jurisdiction;~~
- ~~(i) Any arrest, indictment, charge, or conviction of the applicant;~~
- ~~(j) Civil litigation history where the applicant was or is a party;~~
- ~~(k) Gaming regulatory history;~~
- ~~(l) All governmental financial liens or judgments, including state tax liens, delinquent child support obligations, defaulted student loans, unemployment judgments, unpaid motor vehicle surcharges, welfare judgments, bankruptcy or insolvency findings, wage garnishments;~~
- ~~(m) Whether any civil judgments have been obtained against the applicant pertaining to antitrust or security regulation;~~
- ~~(n) Consent to fingerprinting, photographing, supplying of handwriting exemplars, and any lawful inspection, search, or seizure of the applicant, licensee, or registrant while present in a gaming establishment, and/or their personal effects present in a gaming establishment conducted in accordance with 205 CMR;~~
- ~~(o) A signed, dated and notarized release authorization which shall direct all courts, law enforcement agencies, probation departments, military organizations, selective service boards, employers, education institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the applicant as requested by the commission, the bureau or a contractor investigator; and~~
- ~~(p) A signed, dated and notarized Statement of Truth.~~

~~(5) Gaming Service Employee Registration Form. A *Gaming Service Employee Registration Form* shall contain the following information:-~~

- ~~(a) Name, including maiden name and any aliases and nicknames;~~
- ~~(b) Date of birth;~~
- ~~(c) Physical description;~~
- ~~(d) Current address and residence history for the past five years;~~
- ~~(e) Social Security Number, which information is voluntarily provided in accordance with § 7 of the Privacy Act, 5 U.S.C. § 552a;~~
- ~~(f) Citizenship, and, if applicable, resident alien status, including any employment authorization and expiration date; country of which the applicant is a citizen, place of birth, port of entry to the United States and name and address of sponsor(s) upon the applicant's arrival;~~
- ~~(g) Last three jobs, and any gaming related employment during the last ten years;~~
- ~~(h) Any license, permit, approval or registration held by or applied for by the applicant and required to participate in any gaming operation in any jurisdiction;~~
- ~~(i) Any license, permit, approval or registration held by the applicant to work in the gaming industry that was suspended, revoked or denied or had any disciplinary action~~

~~taken against in any jurisdiction;~~

~~(j) Any arrest, indictment, charge, or conviction of the applicant;~~

~~(k) All governmental financial liens or judgments, including state tax liens, delinquent child support obligations, defaulted student loans, unemployment judgments, unpaid motor vehicle surcharges, and/or welfare judgments;~~

~~(l) Consent to fingerprinting, photographing, supplying of handwriting exemplars, and any lawful inspection, search, or seizure of the applicant, licensee, or registrant while present in a gaming establishment, and/or their personal effects present in a gaming establishment conducted in accordance with 205 CMR;~~

~~(m) A signed, dated Statement of Truth; and~~

~~(n) A signed, dated and notarized Release Authorization which shall direct all courts, law enforcement agencies, probation departments, selective service boards, employers, educational institutions, banks, financial and other institutions and all governmental agencies, federal, state and local both foreign and domestic, to release any and all information pertaining to the applicant as requested by the Commission and/or the Bureau.~~

~~(6) Business Entity Disclosure Form – Gaming Vendor Primary. A *Business Entity Disclosure Form Gaming Vendor Primary (BED GVP)* shall contain the following information:~~

~~(a) The current or former official and trade names used and the dates of use;~~

~~(b) The current post office address and, if a corporation, the name of the state under the laws of which it was incorporated, the location of its principal place of business and the names and addresses of its directors and stockholders;~~

~~(c) The former business addresses within the last ten year period and dates of use;~~

~~(d) The business telephone number;~~

~~(e) The name, title and telephone number of the contact person;~~

~~(f) Whether the application is for initial licensure or retention of that license and, if retention, the license number and date of last submission;~~

~~(g) The business form and, as appropriate, a copy of the certificate of incorporation, charter, bylaws, partnership agreement and all amendments, trust agreement or other documentation relating to the legal organization of the enterprise;~~

~~(h) If a publicly traded corporation, the stock exchange its stock is traded on and its symbol;~~

~~(i) The Federal Employer Identification Number;~~

~~(j) A description of the present and any former business engaged in or intended to be engaged in by the vendor and any parent, holding, intermediary or subsidiary company within the past five years and similar information for former businesses for the past ten years;~~

~~(k) A description of the nature, type, number of shares, terms, conditions, rights and privileges of all classes of stock issued by the vendor, if any, and the amount outstanding of each, or which the vendor plans to issue;~~

~~(l) The identity of every person having a direct or indirect interest in the business and the nature of such interest; provided, however, that if the disclosed entity is a trust, the application shall disclose the names and addresses of all beneficiaries; provided further, that if the disclosed entity is a partnership, the application shall disclose the names and addresses of all partners, both general and limited; and provided further, that if the disclosed entity is a limited liability company, the application shall disclose the names and addresses of all members;~~

~~(m) The name, address, date of birth (if appropriate), class of non voting stock, number and percentage of shares held by each person or entity having a beneficial interest in any non voting stock;~~

~~(n) The name, home address, date of birth, current title or position and, if applicable, number of shares and class of stock and percentage of ownership for the following persons:~~

~~1. Each officer, director or trustee;~~

~~2. Each partner whether general, limited or otherwise;~~

~~3. A sole proprietor;~~

~~4. Each natural person or entity that directly or indirectly holds any beneficial or ownership interest of 5% or more of the entity completing the form;~~

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- ~~5. Each sales representative or other person who will regularly solicit business from a casino licensee;~~
 - ~~6. Each management person who supervises a regional or local office which employs sales or junket representatives or other persons who regularly solicit business from a casino hotel;~~
 - ~~7. Any other person not otherwise specified in 205 CMR 134.07(6)(n)1. through 6. who has signed or will sign any agreement with a gaming licensee;~~
 - ~~8. Each natural person who indirectly holds any beneficial or ownership interest of 10% or more of an applicant for a junket enterprise license; and~~
 - ~~9. If a junket enterprise, each junket representative who will deal directly with gaming licensees and their employees.~~
- ~~(o) A flow chart which illustrates the ownership of any other vendor which holds an interest in the filing vendor;~~
- ~~(p) The name, last known address, date of birth, position, dates the position was held, and reason for leaving for any former officers or directors who held such office during the preceding ten years;~~
- ~~(q) The annual compensation of each partner, officer, director and trustee;~~
- ~~(r) The name, home address, date of birth, position, length of time employed and the amount of compensation of each person, other than the persons identified in 205 CMR 134.07(6)(m), who is currently expected to receive annual compensation of more than \$300,000;~~
- ~~(s) A description of all bonus, profit sharing, pension, retirement, deferred compensation or similar plans in existence or to be created by the vendor;~~
- ~~(t) If the vendor is a partnership, a description of the interest held by each partner, whether limited or general, amount of initial investment, amount of additional contribution, amount and nature of any anticipated future investments, degree of control of each partner, percentage of ownership of each partner, and method of distributing profits to each partner;~~
- ~~(u) A description of the nature, type, terms, covenants, and priorities of all outstanding debt and the name, address and date of birth of each debt holder or security holder, type and class of debt instrument held, original debt amount and current debt balance;~~
- ~~(v) A description of the nature, type, terms and conditions of all securities options;~~
- ~~(w) Within the last ten years, the following information for each account held by a bank, savings and loan association or other financial institution, whether foreign or domestic, in the name of the vendor or its nominee or which is otherwise under the direct or indirect control of the vendor:~~
- ~~1. The name and address of the financial institution;~~
 - ~~2. The type of account;~~
 - ~~3. The account numbers; and~~
 - ~~4. The dates held.~~
- ~~(x) A description of the ten highest value contracts or agreements in effect during the preceding 12 months to which it is a party including name, address and nature of the contract or goods or service provided;~~
- ~~(y) A description of any civil, criminal, administrative and investigatory proceedings in any jurisdiction in which the vendor or its subsidiaries have been involved as follows:~~
- ~~1. Any arrest, indictment, charge or conviction for any criminal or disorderly persons offense;~~
 - ~~2. Any criminal proceeding in which the business or its subsidiaries has been a party or has been named as an unindicted co-conspirator;~~
 - ~~3. Existing civil litigation if damages are reasonably expected to exceed \$100,000, except for claims covered by insurance;~~
 - ~~4. Any judgment, order, consent decree or consent order entered against the vendor pertaining to a violation or alleged violation of the federal antitrust, trade regulation or securities laws or similar laws of any state, province or country; and~~
 - ~~5. Any judgment, order, consent decree or consent order entered against the vendor pertaining to a violation or alleged violation of any other state or federal statute, regulation or code which resulted in the imposition of a fine or penalty of \$50,000 or more.~~
- ~~(z) Within the last ten years, for the vendor and any holding or intermediary company, information regarding any judgments or petitions by or against it for bankruptcy or insolvency and any relief sought under any provision of the Federal Bankruptcy Act or~~

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~~any state insolvency law, and any receiver, fiscal agent, trustee, reorganization trustee, or similar officer appointed for the property or business of the vendor or its parent, any holding, intermediary or subsidiary company;~~

~~(aa) Within the last ten years, whether the vendor has had any license or certificate denied, suspended or revoked by any government agency in the Commonwealth of Massachusetts or any other jurisdiction, the nature of such license or certificate, the agency and its location, the date of such action, the disposition, the reasons therefore, and the facts related thereto;~~

~~(bb) Whether the vendor has ever applied for a license, permit or authorization to participate in any lawful gaming operation in the Commonwealth of Massachusetts or any other jurisdiction, the agency and its location, date of application, the nature of the license permit or authorization, number and expiration date;~~

~~(cc) Within the last ten years, whether the vendor or any director, officer, partner, employee or person acting for or on behalf of the vendor has made bribes or kickbacks to any employee, company, organization or government official, foreign or domestic, to obtain favorable treatment or to obtain a competitive advantage;~~

~~(dd) The names and addresses of any current or former directors, officers, partners, employees or third parties who would have knowledge or information concerning 205 CMR 124.07(6)(aa);~~

~~(ee) A copy of each of the following:~~

~~1. Annual reports for the past five years;~~

~~2. If the enterprise is a corporation registered under the Securities Act of 1933 or the Securities Exchange Act of 1934, any annual reports prepared within the last five years on Form 10K pursuant to the Securities Exchange Act of 1934;~~

~~3. An audited financial statement for the last fiscal year, including, without limitation, an income statement, balance sheet and statement of sources and application of funds, and all notes to such statements and related financial schedules;~~

~~4. Copies of all annual financial statements, whether audited or unaudited, prepared in the last five fiscal years, any exceptions taken to such statements by an independent auditor and the management response thereto; and an independent audit report of all financial activities and interests including, but not limited to, the disclosure of all contributions, donations, loans or any other financial transactions to or from a gaming entity or operator in the past five years;~~

~~5. Any current report prepared due to a change in control of the vendor, an acquisition or disposition of assets, a bankruptcy or receivership proceeding, a change in the vendor's certifying accountant or any other material event, or, if the vendor is registered with the SEC, a copy of the most recently filed Form 8K;~~

~~6. The most recent Proxy or Information Statement filed pursuant to § 14 of the Securities Exchange Act of 1934; and~~

~~7. Registration Statements filed in the last five years pursuant to the Securities Act of 1933.~~

~~(ff) An organizational chart of the vendor, including position descriptions and the name of the person holding each position;~~

~~(gg) Copies of all Internal Revenue Forms 1120 (corporate income tax return), all Internal Revenue Forms 1065 (partnership return) or all Internal Revenue Forms 1040 (personal return) filed for the last five years;~~

~~(hh) A copy of a business registration certificate or other proof of valid business registration in Massachusetts;~~

~~(ii) A Subcontractor Information Form completed in accordance with 205 CMR 134.07(11), if so authorized by the Bureau;~~

~~(jj) In addition to the information above, a completed BED GVP shall include the following documents, which shall be dated and signed by the president, chief executive officer, partners, general partner, sole proprietor or other authorized person and notarized:~~

~~1. A Statement of Truth;~~

~~2. A Release Authorization directing all courts, law enforcement agencies, probation departments, selective service boards, employers, educational institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the vendor as requested by the Commission; and~~

~~3. An acknowledgment of receipt of notice regarding confidentiality, and non-refundability of filing fees.~~

~~(7) Business Entity Disclosure Form – Gaming Vendor – Secondary. A Business Entity Disclosure Form – Gaming Vendor – Secondary (BED – GVS) shall contain the following information:~~

- ~~(a) The current or former official and trade names used and the dates of use;~~
- ~~(b) The current post office address and, if a corporation, the name of the state under the laws of which it was incorporated, the location of its principal place of business and the names and addresses of its directors and stockholders;~~
- ~~(c) The former business addresses within the last ten year period and dates of use;~~
- ~~(d) The business telephone number;~~
- ~~(e) The name, title and telephone number of the contact person;~~
- ~~(f) Whether the application is for initial licensure or retention of that license and, if retention, the license number and date of last submission;~~
- ~~(g) The business form and, as appropriate, a copy of the certificate of incorporation, charter, bylaws, partnership agreement and all amendments, trust agreement or other documentation relating to the legal organization of the business;~~
- ~~(h) If a publicly traded corporation, the stock exchange its stock is traded on and its symbol;~~
- ~~(i) The Federal Employer Identification Number;~~
- ~~(j) A description of the nature, type, number of shares, terms, conditions, rights and privileges of all classes of stock issued by the vendor, if any, and the amount outstanding of each, or which the vendor plans to issue;~~
- ~~(k) The identity of every person having a direct or indirect interest in the business and the nature of such interest; provided, however, that if the disclosed entity is a trust, the application shall disclose the names and addresses of all beneficiaries; provided further, that if the disclosed entity is a partnership, the application shall disclose the names and addresses of all partners, both general and limited; and provided further, that if the disclosed entity is a limited liability company, the application shall disclose the names and addresses of all members;~~
- ~~(l) The name, home address, date of birth, current title or position and, if applicable, number of shares and class of stock and percentage of ownership for the following persons:~~
 - ~~1. Each officer, director or trustee;~~
 - ~~2. Each partner whether general, limited or otherwise;~~
 - ~~3. A sole proprietor;~~
 - ~~4. Each natural person or entity that directly or indirectly holds any beneficial or ownership interest of 5% or more of the entity completing the form;~~
 - ~~5. Each sales representative or other person who will regularly solicit business from a gaming licensee;~~
 - ~~6. Any other person not otherwise specified in 205 CMR 134.07(7)(l)1. through 5. who has signed or will sign any agreement with a gaming licensee.~~
- ~~(m) The annual compensation of each partner, officer, director and trustee;~~
- ~~(n) The name, home address, date of birth, position, length of time employed and the amount of compensation of each person, other than the persons identified in 205 CMR 134.07(7)(l), who is currently expected to receive annual compensation of more than \$300,000;~~
- ~~(o) If the vendor is a partnership, a description of the interest held by each partner, whether limited or general, amount of initial investment, amount of additional contribution, amount and nature of any anticipated future investments, degree of control of each partner, percentage of ownership of each partner, and method of distributing profits to each partner;~~
- ~~(p) A description of the nature, type, terms, covenants, and priorities of all outstanding debt and the name, address and date of birth of each debt holder or security holder, type and class of debt instrument held, original debt amount and current debt balance;~~
- ~~(q) A description of the nature, type, terms and conditions of all securities options;~~
- ~~(r) Within the last ten years, the following information for each account held by a bank, savings and loan association or other financial institution, whether foreign or domestic, in the name of the vendor or its nominee or which is otherwise under the direct or indirect control of the vendor:~~
 - ~~1. The name and address of the financial institution;~~
 - ~~2. The type of account;~~

- ~~3. The account numbers; and~~
 - ~~4. The dates held.~~
- (s) ~~A description of any civil, criminal, administrative and investigatory proceedings in any jurisdiction in which the vendor or its subsidiaries have been involved as follows:~~
- ~~1. Any arrest, indictment, charge or conviction for any criminal or disorderly persons offense;~~
 - ~~2. Any criminal proceeding in which the business or its subsidiaries has been a party or has been named as an unindicted co-conspirator;~~
 - ~~3. Existing civil litigation if damages are reasonably expected to exceed \$100,000, except for claims covered by insurance;~~
 - ~~4. Any judgment, order, consent decree or consent order entered against the vendor pertaining to a violation or alleged violation of the federal antitrust, trade regulation or securities laws or similar laws of any state, province or country; and~~
 - ~~5. Any judgment, order, consent decree or consent order entered against the vendor pertaining to a violation or alleged violation of any other state or federal statute, regulation or code which resulted in the imposition of a fine or penalty of \$50,000 or more.~~
- (t) ~~Within the last ten years, for the vendor and any holding or intermediary company, information regarding any judgments or petitions by or against it for bankruptcy or insolvency and any relief sought under any provision of the Federal Bankruptcy Act or any state insolvency law, and any receiver, fiscal agent, trustee, reorganization trustee, or similar officer appointed for the property or business of the vendor or its parent, any holding, intermediary or subsidiary company;~~
- (u) ~~Within the last ten years, whether the vendor has had any license or certificate denied, suspended or revoked by any government agency in the Commonwealth of Massachusetts or any other jurisdiction, the nature of such license or certificate, the agency and its location, the date of such action, the disposition, the reasons therefore, and the facts related thereto;~~
- (v) ~~Whether the vendor has ever applied for a license, permit or authorization to participate in any lawful gaming operation in the Commonwealth of Massachusetts or any other jurisdiction, the agency and its location, date of application, the nature of the license permit or authorization, number and expiration date;~~
- (w) ~~Within the last ten years, whether the vendor or any director, officer, partner, employee or person acting for or on behalf of the vendor has made bribes or kickbacks to any employee, company, organization or government official, foreign or domestic, to obtain favorable treatment or to obtain a competitive advantage;~~
- (x) ~~The names and addresses of any current or former directors, officers, partners, employees or third parties who would have knowledge or information concerning 205 CMR 134.07(7)(w);~~
- (y) ~~A copy of each of the following:~~
- ~~1. Annual reports for the past five years;~~
 - ~~2. If the enterprise is a corporation registered under the Securities Act of 1933 or the Securities Exchange Act of 1934, any annual reports prepared within the last five years on Form 10K pursuant to the Securities Exchange Act of 1934;~~
 - ~~3. An audited financial statement for the last fiscal year, including, without limitation, an income statement, balance sheet and statement of sources and application of funds, and all notes to such statements and related financial schedules;~~
 - ~~4. Copies of all annual financial statements, whether audited or unaudited, prepared in the last five fiscal years, any exceptions taken to such statements by an independent auditor and the management response thereto; and an independent audit report of all financial activities and interests including, but not limited to, the disclosure of all contributions, donations, loans or any other financial transactions to or from a gaming entity or operator in the past five years;~~
 - ~~5. Any current report prepared due to a change in control of the vendor, an acquisition or disposition of assets, a bankruptcy or receivership proceeding, a change in the vendor's certifying accountant or any other material event, or, if the vendor is registered with the SEC, a copy of the most recently filed Form 8K;~~
 - ~~6. The most recent Proxy or Information Statement filed pursuant to § 14 of the Securities Exchange Act of 1934; and~~
 - ~~7. Registration Statements filed in the last five years pursuant to the Securities Act of 1933.~~

- ~~(z) An organizational chart of the vendor, including position descriptions and the name of the person holding each position;~~
- ~~(aa) Copies of all Internal Revenue Forms 1120 (corporate income tax return), all Internal Revenue Forms 1065 (partnership return) or all Internal Revenue Forms 1040 (personal return) filed for the last five years;~~
- ~~(bb) A copy of a business registration certificate or other proof of valid business registration in Massachusetts;~~
- ~~(cc) A Subcontractor Information Form completed in accordance with 205 CMR 134.07(11), if so authorized by the Bureau;~~
- ~~(dd) In addition to the information above, a completed BED GVS shall include the following documents, which shall be dated and signed by the president, chief executive officer, partners, general partner, sole proprietor or other authorized person and notarized:

 - ~~1. A Statement of Truth;~~
 - ~~2. A Release Authorization directing all courts, law enforcement agencies, probation departments, selective service boards, employers, educational institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the vendor as requested by the commission; and~~
 - ~~3. An acknowledgment of receipt of notice regarding confidentiality and non-refundability of filing fees.~~~~

~~(8) Non-gaming Vendor Registration Form. A *Non-gaming Vendor Registration Form* shall contain the following information:~~

- ~~(a) Any official or trade name used by the non-gaming vendor;~~
- ~~(b) The current address and telephone number of the non-gaming vendor;~~
- ~~(c) The nature of the non-gaming vendor's business and the type of goods and services to be provided to a gaming licensee;~~
- ~~(d) The Federal Employer Identification Number;~~
- ~~(e) The name, residence address, social security number, and date of birth of each of the following persons:

 - ~~1. The sales representative(s) or other person(s) who solicit(s) business from a gaming licensee or applicant and such person's immediate supervisors; and~~
 - ~~2. Any person authorized to sign any agreement with the gaming licensee or applicant on behalf of the vendor; and~~
 - ~~3. The name(s), address(es) and percentage of ownership held by each entity or person directly owning more than five percent of the enterprise.~~~~
- ~~(f) A Subcontractor Information Form completed in accordance with 205 CMR 134.07(11), if so authorized by the Bureau.~~
- ~~(g) Consent to fingerprinting, photographing, and the supplying of handwriting exemplars signed by any individual identified in accordant to 205 CMR 134.07(8)(e).~~
- ~~(h) A Release Authorization directing all courts, law enforcement agencies, probation departments, selective service boards, employers, educational institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the vendor as requested by the Commission.~~

- (5) **Labor Organization Registration Statement.** Each labor organization, union or affiliate seeking to represent employees who are employed at a gaming establishment shall register with the commission on a form to be created by the Bureau and submitted to the Division of Licensing. Such form shall contain, at a minimum, information to identify the officers, agents and/or principals of the organization and information to establish whether the organization and/or any of its officers, agents or principals hold any financial interest in a gaming establishment whose employees are represented by the organization.

A Labor Organization Registration Statement shall contain the following information:

- ~~(a) The name of the registrant as shown on its charter or in its constitution;~~
- ~~(b) The current business addresses of the registrant, including the address, telephone and fax numbers of any office where matters pertaining to employees of a gaming licensee will be conducted;~~
- ~~(c) The name, title, email address, telephone and fax numbers of a primary contact person;~~
- ~~(d) Whether the submission is an initial or biennial renewal registration;~~

- ~~(e) The names of the registrant's parent organization and all affiliates of the registrant or its parent organization, whether chartered by the parent organization or governed by the same constitution or bylaws;~~
- ~~(f) The name and nature of the actual or probable involvement of any affiliate which represents or is seeking to represent employees who are employed in a gaming establishment or which is involved or seeking to be involved in the control or direction of such representation;~~
- ~~(g) Financial data, including information concerning any financial interests held in a gaming establishment; and~~
- ~~(h) The name, address and, where applicable, date of birth, title or position and authority or responsibility, of the following persons or entities:

 - ~~1. Any pension or welfare system maintained by the registrant;~~
 - ~~2. Each officer and agent of any pension or welfare system maintained by the registrant;~~
 - ~~3. Each officer and officer-elect of the registrant;~~
 - ~~4. Each agent authorized to represent the registrant in Massachusetts; and~~
 - ~~5. Each principal employee of the registrant.~~~~
- ~~(i) A notarized Statement of Truth, which shall be dated and signed by the registrant's president or other authorized officer;~~
- ~~(j) A waiver of liability as to the Commonwealth of Massachusetts and its instrumentalities and agents for any damages resulting to the registrant from any disclosure or publication of information acquired during the investigation process;~~

~~(10) Labor Organization Individual Disclosure Form. A *Labor Organization Individual Disclosure Form* shall contain the following information:~~

- ~~(a) Name, including maiden name and any aliases or nicknames;~~
- ~~(b) Title or position with the labor organization;~~
- ~~(c) Date and place of birth;~~
- ~~(d) Physical description;~~
- ~~(e) Current address and home telephone number, email address, and residence history for the past year;~~
- ~~(f) Social Security Number, which information is voluntarily provided in accordance with § 7 of the Privacy Act, 5 U.S.C. § 552a;~~
- ~~(g) Citizenship and, if applicable, information concerning resident alien status;~~
- ~~(h) Full name of the labor organization represented;~~
- ~~(i) Telephone number and email address at current place of employment;~~
- ~~(j) Employment history:

 - ~~1. All positions held with a labor organization, union or affiliate, whether or not compensated, for the past five years; and~~
 - ~~2. Last three jobs, indicating any gaming related positions;~~~~
- ~~(k) Licenses or other approvals held or applied for which are required to participate in any lawful gambling operation in the Commonwealth of Massachusetts or any jurisdiction;~~
- ~~(l) A signed, dated and notarized Statement of Truth;~~
- ~~(m) A waiver of liability as to the Commonwealth of Massachusetts and its instrumentalities and agents for any damages resulting to the officer, agent or principal employee from any disclosure or publication of information acquired during the investigation process.~~

(6) Subcontractor Information Form. A Subcontractor Information Form shall be created by the Bureau requesting any information as deemed necessary by the Bureau and submitted to the Division of Licensing. contain the following information:

- ~~(a) The official or trade name (for purposes of 205 CMR 134.07(11) a subcontractor shall be considered a person that contracts with a licensed or registered vendor to provide goods or services necessary to fulfill the licensed or registered vendor's contract with a gaming licensee);~~
- ~~(b) The current address, telephone number, email address, and any website for the subcontractor;~~
- ~~(c) The nature of the subcontractor's business and the type of goods and services to be provided to the vendor including the term and value of the contract;~~
- ~~(d) The Federal Employer Identification Number of the subcontractor;~~

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- ~~(e) The name, residence address, social security number, and date of birth of each of any person authorized to sign any agreement with the vendor on behalf of the subcontractor; and~~
- ~~(f) Consent to fingerprinting, photographing, and the supplying of handwriting exemplars signed by any individual identified in accordance with 205 CMR 134.07(11);~~
- ~~(g) The name(s), address(es) and percentage of ownership held by each entity or person directly owning more than 5% of the enterprise;~~
- ~~(h) A Release Authorization directing all courts, law enforcement agencies, probation departments, selective service boards, employers, educational institutions, banks, financial and other institutions and all governmental agencies, federal, state and local, both foreign and domestic, to release any and all information pertaining to the subcontractor as requested by the commission.~~

134.08: Submission of Application

(1) An application, **disclosure form, or registration** for the initial issuance of a key gaming employee license in accordance with 205 CMR 134.01, a gaming employee license in accordance with 205 CMR 134.02, a gaming service employee registration in accordance with 205 CMR 134.03, a gaming vendor license in accordance with 205 CMR 134.04(1), a non-gaming vendor registration in accordance with 205 CMR 134.04(2), a Gaming Vendor qualifier license **disclosure form** in accordance with 205 CMR 134.04(1)(c), **and** a Labor Organization registration **statement** in accordance with 205 CMR 134.05, ~~and officers, agents, and principal employees of a Labor Organization in accordance with 205 CMR 134.05~~ shall include all of the following:

(a) A completed application form as follows:

1. An applicant for a key gaming employee-executive license shall file a *Multi-jurisdictional Personal History Disclosure Form For Key Gaming Employees-Executive* as set forth in 205 CMR 134.07(1) and a *Massachusetts Supplement Form For Key Gaming Employees-Executive* as set forth in 205 CMR 134.07(1)(a)(2);
2. An applicant for a key gaming employee-standard license shall file a Key Gaming Employee-standard Application Form as set forth in 205 CMR 134.07(3);
3. ~~(3)~~An applicant for a gaming employee license shall file a Gaming Employee License Form as set forth in 205 CMR 134.07(1)(a)(4);
4. ~~(4)~~An person seeking to register as a ~~applicant for a~~ gaming service employee ~~registration~~ shall file a Gaming Service Employee Registration Form as set forth in 205 CMR 134.07(2)(a)(5);
5. ~~(5)~~An applicant for a gaming vendor-primary license shall file a Business Entity Disclosure Form-Gaming Vendor-primary as set forth in 205 CMR 134.07(3)(b)(6);
6. ~~(6)~~An applicant for a Gaming Vendor-secondary license shall file a Business Entity Disclosure Form-Gaming Vendor-secondary as set forth in 205 CMR 134.07(3)(b)(7);
7. ~~(7)~~An **person seeking to register as applicant** for a non-gaming vendor ~~registration~~ shall file a Non-gaming Vendor Registration Form as set forth in 205 CMR 134.07(4)(a)(8);
8. ~~(8)~~A gaming vendor-primary qualifier (individual) shall file a Key Gaming Employee-standard Application Form as set forth in 205 CMR 134.07(2)(a) **or in the alternative the individual may request authorization from the Bureau to file a Multi-jurisdictional Personal History Disclosure Form and a Massachusetts Supplement;**
9. ~~(9)~~A gaming vendor-secondary qualifier (individual) shall file a Gaming Employee Application Form as set forth in 205 CMR 134.07(2)(a)(4);
10. ~~(10)~~A gaming vendor-primary qualifier (entity) shall file a Business Entity Disclosure Form-Gaming Vendor-primary as set forth in 205 CMR 134.07(6)(3)(b);
11. ~~(11)~~A gaming vendor-secondary qualifier (entity) shall file a Business Entity Disclosure Form-Gaming Vendor-Secondary as set forth in 205 CMR 134.07(7)(3)(b).
12. ~~(12)~~A Labor Organization shall file a Labor Organization Registration Statement as set forth in 205 CMR 134.07(5)(a)(9);
13. ~~(13)~~Officers, agents, and principal employees of a Labor Organization shall file a Labor Organization Individual Disclosure Form as set forth in 205 CMR 134.07(10).

- ~~(b) A passport style photograph of the applicant, taken within the preceding 12 months;~~
- ~~(c) Proof of fingerprinting in accordance with 205 CMR 134.13;~~

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- ~~(d) The documents required for identification by 205 CMR 134.14~~
- ~~(e) Any applicable fee required by 205 CMR 134.15.~~
- (b) (For Gaming Employees and Gaming Service Employees) Proof of an offer of employment from a gaming licensee **in the manner prescribed by the Division of Licensing, pending licensure or registration of the applicant.**
- (c) (For Gaming Vendors-Secondary and Non-Gaming Vendors) **Proof of vendor's business relationship with gaming licensee in the manner prescribed by the Division of Licensing.**

(2) Notwithstanding 205 CMR 134.08(1)(a), a qualifier for a gaming vendor license may, if authorized by the Bureau, file **licensing disclosure** information, including but not limited to, for publicly traded companies, copies of their securities filings and/or audited consolidated financial statements for a period as determined by the Bureau, in *lieu* of the form identified in 205 CMR 134.08(1)(a).

(3) An applicant for a key gaming employee license who has previously been issued a positive determination of suitability by the Commission as part of an RFA-1 investigation may file supplemental licensing information that updates their previous filing submitted as part of the qualifier suitability investigation as directed by the Division of Licensing in *lieu* of the full application identified in 205 CMR 134.08(1)(a).

(4) Each applicant shall file a complete application pursuant to 205 CMR 134.08(1) with the **Division of Licensing in the manner prescribed by the Division of Licensing.** ~~Bureau by mail, in person at the address specified on the application form, or via the Commission's website.~~ The ~~Bureau~~ **Division of Licensing** shall not accept an incomplete application.

(5) Reciprocity for Vendors. If an applicant for a gaming vendor license or non-gaming vendor registration is licensed or registered in another jurisdiction within the United States with comparable license and registration requirements, as determined by the Bureau, and is in good standing in all jurisdictions in which it holds a license or registration, the commission may enter into a reciprocal agreement with the applicant, upon the recommendation of the Bureau, to allow for an abbreviated licensing or registration process and issue a gaming vendor license or registration in accordance with 205 CMR 134.00; provided, however, as part of any such an agreement that the commission shall reserve its rights to investigate the qualifications of an applicant at any time and may require the applicant to submit to a full application for a gaming vendor license or provide further information for registration. The reciprocal agreement shall identify the nature of the investigation to be conducted prior to issuance of the requested license or registration including, but not limited to, such provisos as the review of any investigatory reports from any jurisdictions in which the applicant is approved to conduct business, interviewing of any witnesses, and the filing of all required Massachusetts business filings.

(6) Scope of Duties. An employee of a gaming establishment may, where otherwise qualified, engage in the following duties without further licensure by the commission:

- (a) A person who is licensed as a Key Gaming Employee-executive may, where otherwise qualified, engage in the performance of duties of a Key Gaming Employee-standard, gaming employee or gaming service employee.
- (b) A person who is licensed as a Key Gaming Employee-standard may, where otherwise qualified, engage in the performance of duties of a gaming employee or gaming service employee.
- (c) A person who is licensed as a gaming employee may engage in the performance of duties of a gaming service employee.

134.09: Investigation, Determination, and Appeals for Gaming Establishment Employees and Vendors

(1) Upon receipt of an application for a key gaming employee license in accordance with 205 CMR 134.01, a gaming employee license in accordance with 205 CMR 134.02, a gaming service employee registration in accordance with 205 CMR 134.03, a gaming vendor license in accordance with 205 CMR 134.04(1), a non-gaming vendor registration in accordance with 205 CMR 134.04(4), **or the disclosure materials from** a gaming vendor qualifier license in accordance with 205 CMR 134.04(4), ~~or a Labor Organization in accordance with 205~~

~~CMR 134.05~~ the Division of Licensing shall conduct a review of each for administrative completeness and then forward the application **or submission** to the Bureau which shall conduct an investigation of the applicant. In the event an application **or submission** is deemed incomplete, the Division of Licensing may either request supplemental information from the applicant **or qualifier, or administratively close the application in accordance with 205 CMR 134.14**~~or forward the application to the commission with a recommendation that it be denied.~~ For individuals, the investigation shall include obtaining and reviewing criminal offender record information from the Department of Criminal Justice Information Services (DCJIS) and exchanging fingerprint data and criminal history with the Massachusetts Department of State Police and the United States Federal Bureau of Investigation. The investigation shall be conducted for purposes of determining whether the applicant is suitable to be issued a license or registration in accordance with 205 CMR 134.10 and 134.11.

In determining the weight to be afforded any information bearing on suitability in accordance with 205 CMR 134.10 and 134.11, the Division of Licensing, Bureau, or commission, as applicable, shall consider: the relevance of the information to employment in a gaming establishment or doing business with a gaming establishment in general, whether there is a pattern evident in the information, and whether the applicant is likely to be involved in gaming related activity. Further, the information will be considered in the light most favorable to the applicant unless the information cannot be so viewed pursuant to M.G.L. c. 23K or the information obtained does not otherwise support such view. For purposes of 205 CMR 134.00 and M.G.L. c. 23K, § 16 an adjudication of delinquency shall not be considered a conviction. Such a finding may, however, be considered for purposes of determining the suitability of an applicant. Records of criminal appearances, criminal dispositions, and/or any information concerning acts of delinquency that have been sealed shall not be considered for purposes of making a suitability determination in accordance with 205 CMR 134.00 and M.G.L. c. 23K.

(a) ~~Keys Gaming Employees Executive, Key Gaming Employee Standard, and Gaming Employees.~~ Upon completion of the investigation conducted in accordance with 205 CMR 134.09(1) the Bureau shall either approve or deny the application for a key gaming employee ~~executive license, key gaming employee standard license~~ or a gaming employee license pursuant to 205 CMR 134.10. If the application for a Key Gaming Employee ~~standard~~ license or Gaming Employee license is approved, the Bureau shall forward a written approval to the Division of Licensing which shall issue a license to the applicant on behalf of the Commission. ~~If the Bureau approves the application for a Key Gaming Employee executive, the decision shall be forwarded to the Commission as a recommendation along with the application materials for review and issuance of the license.~~ If the application is denied, the Bureau shall forward the ~~recommendation for~~ **determination of** denial and reasons therefor to the Division of Licensing which shall issue a written decision to the applicant explaining the reasons for the denial. The decision shall include an advisory to the applicant that they may **request an appeal hearing before** ~~appeal the decision to~~ the Bureau in accordance with 205 CMR 134.09(2). If the denial is based upon information contained in the individual's criminal record the decision shall also include an advisory that the individual will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The decision may be served via first class mail or via email to the addresses provided by the applicant on the application.

(b) Gaming Service Employees. The Division of Licensing shall issue a gaming service employee registration to the applicant on behalf of the Commission in accordance with 205 CMR 134.11(1). In the event that the Bureau determines upon completion of the investigation conducted in accordance with 205 CMR 134.09(1) that the applicant should be disqualified from holding a registration or is otherwise unsuitable in accordance with 205 CMR 134.11, it shall forward the results of the investigation to the Division of Licensing which shall issue a written notice to the registrant **denying or** revoking the registration. The notice shall include an advisory to the applicant that they shall immediately cease employment at the gaming establishment and may request an appeal hearing before the Bureau in accordance with 205 CMR 134.09(2). If the denial is based upon information contained in the individual's criminal record the decision shall also

include an advisory that the individual will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The notice may be served via first class mail or via email to the addresses provided by the applicant on the application.

(c) ~~Gaming Vendors and Gaming Vendor Qualifiers.~~ Upon completion of the investigation conducted in accordance with 205 CMR 134.09(1) the Bureau shall either approve or deny the application for a gaming vendor license pursuant to 205 CMR 134.10. If the Bureau approves the application for a Gaming Vendor license and any associated applications for Gaming Vendor qualifier licenses, the Bureau shall forward a written approval to the Division of Licensing which shall issue a license to the applicant on behalf of the commission. ~~decisions shall be forwarded to the Commission as a recommendation along with the application materials for review and issuance of the license. If an application for a Gaming vendor qualifier license is approved by the Bureau subsequent to the issuance of the Gaming Vendor license by the commission, the Bureau shall forward a written approval to the Division of Licensing which shall issue a license to the applicant on behalf of the Commission.~~ If the application is denied, the Bureau shall forward the recommendation for **determination of** denial and reasons therefor to the Division of Licensing which shall issue a written decision to the applicant explaining the reasons for the denial. The decision shall include an advisory to the applicant that they may **request an appeal hearing before** the decision to the Bureau in accordance with 205 CMR 134.09(2). If the denial is based upon information contained in a person's criminal record the decision shall also include an advisory that the person will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The decision may be served via first class mail or via email to the addresses provided by the applicant on the application.

(d) Non-gaming Vendors. The Division of Licensing shall issue a non-gaming vendor registration to the applicant on behalf of the Commission in accordance with 205 CMR 134.11(1). In the event that the Bureau determines upon completion of the investigation conducted in accordance with 205 CMR 134.09(1) that the applicant should be disqualified from holding a registration or is otherwise unsuitable in accordance with 205 CMR 134.11, it shall forward the results of the investigation to the Division of Licensing which shall issue a written notice to the registrant **denying or** revoking the registration. The notice shall include an advisory to the applicant that they shall immediately cease doing business with the gaming establishment and may request an appeal hearing before the Bureau in accordance with 205 CMR 134.09(2). If the denial is based upon information contained in the person's criminal record the decision shall also include an advisory that the person will be provided with a copy of their criminal record upon request and that they may challenge the accuracy of any relevant entry therein. The notice may be served via first class mail or via email to the addresses provided by the applicant on the application.

(e) ~~Labor Organizations.~~ The Bureau shall issue a Labor Organization registration to the applicant on behalf of the Commission in accordance with 205 CMR 134.11(1).

(2) If an application for a key gaming employee license, gaming employee license, gaming service employee registration, gaming vendor license, **or** non-gaming vendor registration, ~~or gaming vendor qualifier license~~ is denied or revoked in accordance with 205 CMR 134.09(1) the applicant may appeal the decision and request a hearing before the Bureau within 30 days of service of the decision. The request for an appeal hearing must be in writing on a form provided by the Bureau **clerk of the Commission** and contain an explanation of the basis for the appeal. **Hearings held pursuant to this section shall be held in accordance with 205 CMR 101.03.**

(3) ~~The Bureau shall appoint a hearing officer to preside over the appeal hearing requested by an applicant in accordance with 205 CMR 134.09(2). The hearing will be conducted in accordance with M.G.L. c. 30A and 801 CMR 1.02: Informal/Fair Hearing Rules. An audio recording of the hearing shall be taken. The hearing officer shall issue a written decision to the applicant. The hearing officer may affirm the denial of the application or revocation of the registration, reverse the decision and recommend that the license or registration be issued, or recommend that the license or registration be issued with conditions. The hearing officer may recommend any condition that is reasonably calculated to ensure faithful performance of the employee's duties or vendor's obligations. The decision shall include an advisory to the applicant that they may appeal the decision to the commission in accordance with 205 CMR~~

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~~134.09(5). The decision may be served via first class mail or via email to the addresses provided by the applicant on the application. Review by the commission of decisions of the hearing officer may be obtained in accordance with 205 CMR 101.04.~~

~~(4) After a hearing conducted in accordance with 205 CMR 134.09(3) the following shall apply:-~~

~~(a) If the hearing officer recommends that a Key Gaming Employee standard license, Gaming Employee license, gaming service employee registration, Gaming vendor qualifier, or non-gaming vendor registration be issued, the Division of Licensing shall issue a license or registration to the applicant on behalf of the Commission.-~~

~~(b) If the hearing officer recommends that the application for a Key Gaming Employee executive or Gaming vendor license be issued, the decision shall be forwarded to the Commission as a recommendation along with the application and appeal materials for review and issuance of the license.~~

~~(5) If an application for a key gaming employee license, gaming employee license, gaming service employee registration, gaming vendor license, non gaming vendor registration, or gaming vendor qualifier is denied or approved with conditions in accordance with 205 CMR 134.09(3) the applicant may appeal the decision and request a hearing before the commission within 30 days of service of the decision. The request for an appeal hearing must be in writing on a form provided by the commission and contain an explanation of the basis for the appeal. The hearing will be conducted at a public meeting solely on the record of the administrative proceedings conducted by the Bureau in accordance with 205 CMR 134.09(3). The Bureau shall forward a copy of the administrative record of the proceeding to the commission promptly upon receipt of the notice of appeal.-~~

~~(6) After the hearing conducted in accordance with 205 CMR 134.09(5) the commission shall issue a written decision to the applicant. The commission may affirm the denial of the application or revocation of the registration, reverse the decision and order that the license or registration be issued, order that the license or registration be issued with conditions or remand the matter to the Bureau for further proceedings. The commission may impose any condition that is reasonably calculated to ensure faithful performance of the employee's duties or vendor's obligations.-~~

~~(7) In reviewing the Bureau's decision in accordance with 205 CMR 134.09(6), the commission may consider whether the decision or any condition imposed is:-~~

~~(a) In excess of the statutory or regulatory authority or jurisdiction of the commission; or-~~

~~(b) Based upon an error of law; or-~~

~~(c) Made upon unlawful procedure; or-~~

~~(d) Unsupported by substantial evidence; or-~~

~~(e) Arbitrary or capricious, an abuse of discretion, or otherwise not in accordance with law.-~~

~~(8) The decision of the commission made in accordance with 205 CMR 134.09(6) and (7) shall be final and an applicant shall not be entitled to further review.-~~

134.10: Affirmative License Standards for the Licensing of Employees and Vendors of the Gaming Establishment

(1) An applicant for a key gaming employee license, gaming employee license, gaming vendor license, and a gaming vendor qualifier ~~license~~ shall establish its individual qualifications for licensure by clear and convincing evidence.

(2) In determining whether an applicant for licensure is suitable for purposes of being issued a key gaming employee license, gaming employee license, **or** gaming vendor license, ~~or gaming vendor qualifier license~~, or having any of these licenses renewed, the Bureau shall evaluate and consider the overall reputation of the applicant **and qualifiers, if any**, including, without limitation:

(a) the integrity, honesty, good character and reputation of the applicant **and qualifiers**;

(b) the financial stability, integrity and background of the applicant **and qualifiers**;

(c) whether the applicant **and its qualifiers have** ~~has~~ a history of compliance with gaming licensing requirements in other jurisdictions;

- (d) whether the applicant **or any qualifier**, at the time of application, is a defendant in litigation;
- (e) whether the applicant is disqualified from receiving a license under 205 CMR 134.10(3);
- (f) whether the applicant **or any qualifier** has been convicted of a crime of moral turpitude;
- (g) whether and to what extent the ~~individual~~**applicant or any qualifier** has associated with members of organized crime and other persons of disreputable character;
- (h) the extent to which the ~~individual~~**applicant and qualifiers have**~~has~~ cooperated with the Bureau in connection with the background investigation;
- (i) (for vendors) the integrity, honesty, and good character of any subcontractor.

(3) The Bureau and Commission shall deny an application for a key gaming employee license, gaming employee license, **or gaming vendor license**, ~~or gaming vendor qualifier license~~ if the applicant:

- (a) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; **except that for such disqualifying convictions under G.L. c. 23K, § 16 and 205 CMR 134.10(3)(a) which occurred before the 10-year period immediately preceding submission of the application for licensure, the Bureau may, in its discretion, approve the issuance of a gaming employee license to an applicant who affirmatively demonstrates rehabilitation in accordance with 205 CMR 134.10(4);**
- (b) submitted an application for a license under M.G.L. c. 23K, § 30 and 205 CMR 134.00 that **willfully, knowingly or** intentionally contains false or misleading information;
- (c) committed prior acts which have not been prosecuted or in which the applicant was not convicted but form a pattern of misconduct that makes the applicant unsuitable for a license; or
- (d) has affiliates or close associates that would not qualify for a license or whose relationship with the applicant may pose an injurious threat to the interests of the commonwealth in awarding a gaming license to the applicant.

(4) Rehabilitation.

(a) An applicant for a Key gaming employee license, gaming employee license, ~~or gaming vendor license~~ **or a gaming vendor qualifier license** may provide proof of rehabilitation from a criminal conviction as part of the application for licensure.

(b) An applicant for a Key gaming employee license may not appeal a decision made by the Bureau to the Commission in accordance with 205 CMR 134.09(6) that was based upon a disqualifying prior conviction in accordance with 205 CMR 134.10(3)(a) on the basis that they wish to demonstrate rehabilitation.

~~(c) An applicant for a Gaming employee license or gaming vendor qualifier license may appeal a decision made by the Bureau based upon a disqualifying prior conviction in accordance with 205 CMR 134.10(3)(a) on the basis that they wish to demonstrate rehabilitation only if the conviction occurred before the ten year period immediately preceding the date of submission of the application for licensure or registration.~~

~~(b) (d) In its discretion, the Bureau and/or Commission may issue a Gaming employee license or Gaming vendor qualifier license to an applicant who can affirmatively demonstrate the applicant's rehabilitation. In considering the rehabilitation of an applicant the Bureau and Commission shall consider the following:~~

1. the nature and duties of the position of the applicant;
2. the nature and seriousness of the offense or conduct;
3. the circumstances under which the offense or conduct occurred;
4. the date of the offense or conduct;
5. the age of the applicant when the offense or conduct was committed;
6. whether the offense or conduct was an isolated or repeated incident;
7. any social conditions which may have contributed to the offense or conduct; and
8. any evidence of rehabilitation, including recommendations and references of persons supervising the applicant since the offense or conduct was committed.

~~(c) Any applicant may appeal a decision made by the Bureau based upon a conviction for a crime of moral turpitude as set forth in 205 CMR 134.10(2)(f). In its discretion, the Bureau and Commission may issue a Key gaming employee license, Gaming employee license, or gaming vendor qualifier license to an applicant who can affirmatively~~

~~demonstrate the applicant's rehabilitation. In considering the rehabilitation of an applicant, the Bureau and Commission shall consider the factors outlined in 205 CMR 134.10(4)(d).~~

(c) ~~(f)~~An applicant for a license or registration shall be at least 18 years of age at the time of application.

134.11: Affirmative Registration Standards for the Registration of Employees and Vendors of the Gaming Establishment and Labor Organizations

(1) Upon submission of an administratively complete ~~application for~~ registration ~~form~~ as a gaming service employee; ~~or non-gaming vendor, or Labor Organization by an applicant~~ the ~~Division of Licensing Bureau~~ shall issue the registration on behalf of the Commission in accordance with 205 CMR 134.09(1). A registration may be ~~denied or~~ subsequently revoked if it is determined that the applicant is disqualified in accordance with 205 CMR 134.11(2) or unsuitable for any criteria identified in 205 CMR 134.11(3).

(2) The Bureau and Commission shall deny and/or revoke a registration as a gaming service employee or non-gaming vendor ~~registrant~~ if the ~~person individual applicant or individual identified in 205 CMR 134.07(8)(e):~~ **person** individual applicant or individual identified in 205 CMR 134.07(8)(e):

(a) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; ~~except that for such disqualifying convictions under M.G.L. c. 23K, § 16 and 205 CMR 134.11(2)(a) which occurred before the 10-year period immediately preceding submission of the registration, the Bureau may, in its discretion, decline to deny or revoke the registration of a person who affirmatively demonstrates rehabilitation in accordance with 205 CMR 134.11(4).~~

(b) submitted an ~~registration form application for a license~~ under M.G.L. c. 23K, § 30 and 205 CMR 134.00 that ~~willfully, knowingly or~~ intentionally contains false or misleading information;

(c) committed prior acts which have not been prosecuted or in which the ~~registrant applicant~~ was not convicted but form a pattern of misconduct that makes the ~~registrant applicant~~ unsuitable; or

(d) has affiliates or close associates that would not qualify for a license or whose relationship with the ~~registrant applicant~~ may pose an injurious threat to the interests of the commonwealth in awarding a ~~registration gaming license to the applicant.~~

(3) In determining whether a ~~registrant applicant for registration~~ is suitable for purposes of being issued a gaming service employee registration or non-gaming vendor registration, or having a registration renewed, the Bureau may evaluate and consider the overall reputation of the ~~registrant applicant~~ including, without limitation:

(a) the integrity, honesty, good character and reputation of the ~~registrant applicant~~;

(b) the financial stability, integrity and background of the ~~registrant applicant~~;

(c) whether the ~~registrant applicant~~ has a history of compliance with gaming licensing requirements in other jurisdictions;

(d) whether the ~~registrant applicant~~, at the time of ~~submission of the registration form application~~, is a defendant in litigation;

(e) whether the ~~registrant applicant~~ is disqualified from receiving a ~~registration license~~ under 205 CMR 134.11(2);

(f) whether the ~~registrant applicant~~ has been convicted of a crime of moral turpitude;

(g) whether and to what extent the individual has associated with members of organized crime and other persons of disreputable character;

(h) the extent to which the individual has cooperated with the Bureau in connection with the background investigation;

(i) (for vendors) the integrity, honesty, and good character of any subcontractor.

(4) Rehabilitation.

~~(a) The holder of a Gaming service employee registration or non-gaming vendor registration may appeal a decision made by the Bureau based upon a disqualifying prior conviction in accordance with 205 CMR 134.11(2) on the basis that they wish to demonstrate rehabilitation only if the conviction occurred before the ten year period immediately preceding application for licensure or registration.~~

~~(b) In its discretion, the Bureau and/or Commission may issue a Gaming service~~

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~~employee registration or a non gaming vendor registration to an applicant who can affirmatively demonstrate the applicant's rehabilitation. In considering the rehabilitation of an applicant the Bureau and Commission shall consider the following:~~

1. the nature and duties of the position of the applicant;
2. the nature and seriousness of the offense or conduct;
3. the circumstances under which the offense or conduct occurred;
4. the date of the offense or conduct;
5. the age of the applicant when the offense or conduct was committed;
6. whether the offense or conduct was an isolated or repeated incident;
7. any social conditions which may have contributed to the offense or conduct; and
8. any evidence of rehabilitation, including recommendations and references of persons supervising the applicant since the offense or conduct was committed.

~~(e) Any applicant may appeal a decision made by the Bureau based upon a conviction for a crime of moral turpitude as set forth in 205 CMR 134.11(3). In its discretion, the Bureau and Commission may issue a Gaming service employee registration or non-gaming vendor registration to an applicant who can affirmatively demonstrate the applicant's rehabilitation. In considering the rehabilitation of an applicant, the Bureau and Commission shall consider the factors outlined in 205 CMR 134.11(4)(b).~~

(5) An applicant for a registration shall be at least 18 years of age or older at the time of application.

(6) The Bureau may deny an application for registration as a non-gaming vendor if it determines that the applicant formed the applicant entity for the sole purpose of circumventing 205 CMR 134.04(1)(b).

134.12: Temporary Licenses

(1) Temporary Licenses for Employees.

(a) Upon petition to the commission by a gaming licensee, the commission may issue a temporary license to an applicant for a key gaming employee license or a gaming employee license if:

1. the applicant for a key gaming employee license or a gaming employee license has filed a completed application with the commission and has submitted all of the disclosure forms as required by the Division of Licensing; and
2. the gaming licensee certifies, and the commission finds, that the issuance of a temporary license is necessary for the operation of the gaming establishment and is not designed to circumvent the normal licensing procedures.

(b) A temporary license shall issue unless:

1. A preliminary review of the Applicant shows that the Applicant is disqualified under one or more of the criteria listed in 205 CMR 134.10(3); or
2. A preliminary review of the Applicant shows that the Applicant will be unable to establish his or her qualifications for licensure under the standards set forth in 205 CMR 134.10(1) and (2).

(c) Unless otherwise stated by the commission, a temporary license issued in accordance with 205 CMR 134.12 shall expire six months from the date of its issuance and may be renewed, at the discretion of the commission, for an additional six-month period.

(2) Temporary Licenses for Gaming Vendors.

(a) Upon petition to the commission by a gaming licensee, the commission may issue a temporary license to an applicant for a gaming vendor license if:

1. the applicant for a gaming vendor license has filed a completed application with the commission and has submitted all of the disclosure forms as required by the Division of Licensing; and
2. the gaming licensee certifies, and the commission finds, that the issuance of a temporary license is necessary for the operation of the gaming establishment and is not designed to circumvent the normal licensing procedures.

(b) A temporary license shall issue unless:

1. A preliminary review of the Applicant shows that the Applicant is disqualified under one or more of the criteria listed in 205 CMR 134.10(3); or
2. A preliminary review of the Applicant shows that the Applicant will be unable to

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establish his or her qualifications for licensure under the standards set forth in 205 CMR 134.10(1) and (2).

3. Unless otherwise stated by the commission, a temporary gaming vendor license issued under this section shall expire upon issuance of the full license or upon suspension or revocation of the temporary license, and in any event no later than the term of the license as set forth in 205 CMR 134.16(1).

134.13: Fingerprinting

Each applicant for a key gaming employee license, gaming employee license, gaming service employee registration, and each qualifier for a gaming vendor applicant or licensee, shall be fingerprinted under the supervision of the Commission. The Bureau in its discretion may require one or more officers or employees of any non-gaming vendor registrant to be fingerprinted under the supervision of the Commission. The Commission may, for good cause shown, permit an applicant to alternatively submit three sets of classifiable fingerprints on fingerprint impression cards provided by the Commission.

134.14 Administrative Closure of Applications for Registration or Licensure

- (1) All applicants for a Key Gaming Employee License, a Gaming Employee License, a Gaming Vendor License, a Gaming Service Employee Registration or a Non-Gaming Vendor Registration shall promptly respond to any request for information from the Division of Licensing and/or the Bureau. This obligation is in addition to the continuing duty set forth in 205 CMR 134.18(1).
- (2) Failure of an applicant for a Key Gaming Employee License, a Gaming Employee License, or a Gaming Service Employee Registration to respond to a request for information from the Division of Licensing and/or the Bureau within fourteen (14) days of the request may result in the administrative closure of the application for registration or licensure.
- (3) Failure of an applicant for a Gaming Vendor License or a Non-Gaming Vendor Registration to respond to a request for information from the Division of Licensing and/or the Bureau within thirty (30) days of the request may result in the administrative closure of that license application or registration.
- (4) In the event that an application for registration or licensure is administratively closed for failure to provide requested information or to comply with the obligations set forth in 205 CMR 134.18(1), the Division of Licensing will notify the applicant of the specific deficiencies in the application. Additionally, the following conditions will apply:
 - a. Once an application for registration or licensure has been administratively closed it shall not be re-opened for a minimum of thirty (30) days.
 - b. Any request to re-open an application for registration or licensure previously subject to administrative closure requires the applicant to provide all outstanding information as previously detailed in the administrative closure notification from the Division of Licensing. The submission of outstanding information is not a guarantee of licensure/registration. The Division of Licensing and/or the Bureau may in its discretion require a revised full application after considering the potential for stale information in the original application.

~~134.14: Identification~~

- ~~(1) Every individual applicant for a license or registration shall establish his or her identity to a reasonable certainty.~~
- ~~(2) An individual applicant for a license or registration may establish their identity pursuant to 205 CMR 134.14(1) by providing either:~~
 - ~~(a) One of the following authentic documents:~~
 - ~~1. A current and valid United States passport;~~

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- ~~2. A Certificate of United States Citizenship, or a Certificate of Naturalization, issued by the United States Department of Homeland Security, Citizenship and Immigration Services (USCIS); or~~
- ~~3. A current and valid identification card issued by the USCIS containing a photograph or fingerprints and identifying information such as name, date of birth, sex, height, color of eyes and address; or~~
- ~~(b) A certified copy of a birth certificate issued by a state, county or municipal authority in the United States bearing an official seal, and any one of the following authentic documents:-~~
- ~~1. A current and valid driver's license containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address;-~~
 - ~~2. A current and valid identification card issued to persons who serve in the United States military or their dependents by the United States Department of Defense containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address;-~~
 - ~~3. A current and valid student identification card containing a photograph, an expiration date, the seal or logo of the issuing institution, and the signature of the card holder;-~~
 - ~~4. A current and valid identification card issued by a federal, state or local government agency containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address; or~~
- ~~(c) A current and valid foreign passport with an employment authorization issued by the USCIS, and any one of the following authentic documents:-~~
- ~~1. A current and valid driver's license containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address;-~~
 - ~~2. A current and valid identification card issued to persons who serve in the United States military or their dependents by the United States Department of Defense containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address;-~~
 - ~~3. A current and valid student identification card containing a photograph, an expiration date, the seal or logo of the issuing institution, and the signature of the card holder;-~~
 - ~~4. A current and valid identification card issued by a federal, state or local government agency containing a photograph or identifying information such as name, date of birth, sex, height, color of eyes and address.-~~
- ~~(3) Any individual whose current legal name is different from the name on his or her certified birth certificate (for example, maiden name) must show legal proof of the name change. Such proof includes a certified marriage or civil union certificate, divorce decree or court order linking the new name with the previous name, provided that, a divorce decree may be used as authority to resume using a previous name only if it contains the new name and permits a return to use of the previous name.-~~
- ~~(4) Any individual required to establish his or her identity pursuant to 205 CMR 134.14 who is not a United States citizen shall also be required to demonstrate that he or she is authorized to work in the United States.-~~
- ~~(5) Any individual may request that the commission change the name designated on his or her application, license or registration by establishing identity pursuant to 205 CMR 134.14 or by providing a certified copy of certificate of marriage, a divorce decree or court order from this or any other state, which evidences the requested name change.-~~

134.15: Fees

(1) The following non-refundable initial fees shall be paid at the time of application for licensure, registration, or renewal:

- (a) Key Gaming Employee. Initial fee: \$1000.00, submitted with the application. The applicant shall be billed for the efforts of the Commission and the Bureau on matters directly related to the applicant that exceed the initial fee at hourly rates to be set by the Commission pursuant to M.G.L.c. 23K, § 30(i) including payment for all unusual or out of pocket expenses incurred by the Commission. Timely Renewal fee: \$1000.00.

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- (b) Gaming Employee. Initial fee: \$300.00 Renewal fee: \$300.00.
 - (c) Gaming Service Employee. Initial fee: \$75.00 Renewal fee: \$75.00.
 - (d) Gaming Vendor-primary. Initial fee: \$ 15,000.00, submitted with the application. The applicant shall be billed for the efforts of the Commission and the Bureau on matters directly related to the applicant that exceed the initial fee at hourly rates to be set by the Commission pursuant M.G.L. c. 23K, § 30(i) including payment for all unusual or out of pocket expenses incurred by the Commission. Timely Renewal fee: \$ 15,000.00.
 - (e) Gaming Vendor-secondary. Initial fee \$ 5,000.00 Renewal fee \$ 5,000.00.
 - (f) Gaming Vendor-qualifier. No individual fee. The fee shall be included as part of the application fee for the Gaming vendor. Any additional fees resulting from the investigation of a gaming vendor qualifier shall be assessed to the gaming vendor in accordance with 205 CMR 134.15(2).
 - (g) Non-gaming Vendor. Initial fee: \$100.00 Renewal fee: \$100.00.
 - (h) Labor Organization. Initial fee: \$200.00 Renewal fee: \$200.00.
 - (i) Replacement/Name or Address Changes. \$10.00.
 - (j) Late Fee. a 10% late fee will be assessed to the initial application fee if a renewal application is not received by the Commission by the due date.
- (2) The application fee for a license or registration may be increased to the extent that the cost of the background investigation relating to an applicant exceeds the application fee set forth in 205 CMR 134.15(1). The commission shall advise the applicant in writing that an additional application fee is required and the manner in which the additional fee was calculated. Once an applicant is directed to submit an additional application fee, the commission will take no additional steps with respect to the application until the increased application fee is paid. In the event that an application fee is not promptly paid without just cause, the application may be denied.
- (3) All fees must be submitted to the Bureau in the form of a certified check, cashier's check, personal check or electronic funds transfer payable to the Commonwealth of Massachusetts.
- (4) A processing fee of \$30 will be assessed for return of dishonored checks.
- (5) Payroll Deduction. Licensing fees for applicants for a Gaming Employee license in accordance with 205 CMR 134.15(1)(b) and a Gaming Service Employee registration in accordance with 205 CMR 134.15(1)(c) shall be submitted on behalf of the applicant by the gaming establishment or vendor with which the individual is employed. The gaming establishment or vendor may recover the cost of the fee by way of deduction from the individual's periodic salary payment.

134.16: Term of Licenses

- (1) Licenses and registrations issued in accordance with 205 CMR 134.00 shall be valid for the following terms:
- (a) Key Gaming Employees. Key Gaming employee licenses shall be for an initial term of five years. The initial term of a key gaming employee license shall expire and be renewable on the last day of the month on the fifth anniversary of the issuance date. Key gaming employee license renewals shall be for a term of three years.
 - (b) Gaming Employees. Gaming employee licenses shall be for an initial term of five years. The initial term of a gaming employee license shall expire and be renewable on the last day of the month on the fifth anniversary of the issuance date. Gaming employee license renewals shall be for a term of three years.
 - (c) Gaming Service Employees. Gaming service employee registrations shall be for an initial term of five years. The initial term of a Gaming service employee registration shall expire and be renewable on the last day of the month on the fifth anniversary of the issuance date. Gaming service employee registration renewals shall be for a term of five years.
 - (d) Gaming Vendors and Gaming Vendor Qualifiers. Gaming vendor licenses and gaming vendor qualifier licenses shall be for an initial term of three years. The initial term of a Gaming vendor license and gaming vendor qualifier license shall expire and be renewable on the last day of the month on the third anniversary of the issuance date.

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Gaming vendor license and gaming vendor qualifier license renewals shall be for a term of three years.

(e) Non-gaming Vendors. Non-gaming vendor registration shall be for an initial term of five years. The initial term of a Non-gaming vendor license shall expire and be renewable on the last day of the month on the fifth anniversary of the issuance date. Non-gaming vendor registration renewals shall be for a term of five years.

(f) Labor Organizations. Labor organization registrations shall be for an initial term of one year. The initial term of a Labor organization registration shall expire and be renewable on the last day of the month on the first anniversary of the issuance date.

(2) Notwithstanding 205 CMR 134.16(1), licenses and registrations issued in accordance with 205 CMR 134.00 may be issued with a conditional expiration date to coincide with any employment authorization issued by the United States which is less than the term of the license or registration. A license or registration that is issued with such a conditional expiration date may be extended upon the presentation of proof of United States citizenship or authorization to work in the United States beyond the previous expiration date. Provided, however, no expiration date shall be extended beyond the term for which such a license would have been issued in accordance with 205 CMR 134.16(1).

(3) If a licensee or registrant has, in accordance with 205 CMR 134.17, made timely and sufficient application for a renewal, their license or registration shall not expire and the applicant shall remain in good standing until the Bureau has issued a decision on the application. If a renewal application is received after the renewal date and the license expires before the Commission issues a new license, the person shall not be employable nor conduct business with the gaming establishment until a new license is issued.

(4) A license for a person for whom a positive determination of suitability was issued in accordance with 205 CMR 115.05(3) as part of the RFA-1 process and who filed an application in accordance with 205 CMR 134.08(2) in *lieu* of the complete application for the position for which they seek licensure shall be issued *nunc pro tunc* to the date of the suitability finding.

(5) All licenses and registrations issued in accordance with 205 CMR 134.00 shall be valid for employment with any Massachusetts gaming licensee.

134.17: Renewals

(1) At a minimum of 150 days prior to expiration, each Key gaming employee licensee, gaming employee licensee, gaming vendor licensee, and gaming vendor qualifier licensee shall submit a new and updated application in accordance with 205 CMR 134.08.

(2) At a minimum of 30 days prior to expiration, each gaming service employee registrant and non-gaming vendor registrant shall submit a new and updated application in accordance with 205 CMR 134.08.

(3) It shall be the responsibility of the licensee or registrant to ensure that their license or registration is current.

134.18: Duties of Applicants and Licensees

(1) All applicants, licensees, and registrants shall have the continuing duty to provide any assistance or information required by the commission or the Bureau and to cooperate in any inquiry or investigation conducted by the commission or the Bureau. Refusal to answer or produce information, evidence or testimony by an applicant, licensee, or registrant may result in denial of the application or suspension or revocation of the license or registration.

(2) No applicant, licensee, registrant shall willfully withhold information from, or knowingly give false or misleading information to, the commission or the Bureau. If the commission or Bureau determines that an applicant, or a close associate of an applicant, has willfully provided false or misleading information, such applicant shall not be eligible to receive a license or registration under 205 CMR 134.00. Any licensee or registrant who willfully provides false or misleading information shall have its license conditioned, suspended or revoked by the commission.

(3) Notification of Changes by Employees. Each key gaming employee applicant or licensee, gaming employee applicant or licensee, and gaming service employee registrant shall have a continuing duty to notify and update the commission, in writing, within ten days of the occurrence of the following:

- (a) Any denial, suspension or revocation by a government agency in any jurisdiction of a license, registration, certification, permit or approval held by or applied for by the individual;
- (b) Any discipline imposed upon the individual by a government agency in any jurisdiction;
- (c) Any arrest, indictment, charge or criminal conviction of the individual in any jurisdiction;
- (d) Any reports, complaints or allegations of which the individual is or should be aware involving conduct of that individual that could lead to potential criminal charges, including but not limited to allegations of theft or embezzlement; and
- (e) Any exclusion or barring of the individual from any casino, gaming establishment or gambling/gaming related entity in any jurisdiction.

(4) Notification of Changes by Gaming Vendors. Each gaming vendor applicant or licensee shall have a continuing duty to promptly notify and update the commission, in writing, within ten days of the occurrence of the following:

- (a) The proposed appointment, appointment, proposed nomination, nomination, election, hiring, intended resignation, resignation, removal, firing, incapacitation or death of any person required to be a qualifier under 205 CMR 134.04(4);
- (b) Any denial, suspension or revocation by a government agency of a license, registration, certification, permit or approval held by or applied for by the vendor or any qualifying entity or individual;
- (c) Any indictment, charge or criminal conviction of the vendor or any qualifying entity or individual;
- (d) Any civil litigation in which the vendor is named as a party if damages are reasonably expected to exceed \$100,000, except for claims covered by insurance; and
- (e) Any judgments or petitions by or against the vendor, any qualifying entity or individual or any holding or intermediary company of the vendor for bankruptcy or insolvency.

(5) Notification of Changes by Non-gaming Vendors. Each non-gaming vendor registrant shall have a continuing duty to notify the commission, in writing, of the name, residence address, social security number, and date of birth of each relevant person within ten days of the occurrence of the following:

- (a) Any denial, suspension or revocation by a government agency of a license, registration, certification, permit or approval held by or applied for by the vendor or any qualifying individual;
- (b) Any indictment, charge or criminal conviction of the vendor or any qualifying individual;
- (c) The sales representative(s) or other person(s) who solicit(s) business from a gaming licensee; and
- (d) Any person authorized to sign any agreement with the gaming licensee on behalf of the vendor.

(6) Notification of Change of Ownership of Vendor Entities. Each gaming vendor applicant or licensee and each non-gaming vendor registrant shall have a continuing duty to promptly notify and update the commission, in writing, prior to or immediately upon becoming aware of any proposed or contemplated change of ownership which involves more than 5% of the vendor. This duty includes without limitation the duty to specify whether the transaction involving the change in ownership will result in a consolidation involving the vendor and another entity, including by merger or acquisition.

(7) Commission Referral to the Bureau. Upon receipt of a notice under 205 CMR 134.18(3) through (6), the commission shall refer the matter to the Bureau for appropriate handling, which may include, without limitation, a notice to the applicant, licensee or registrant requiring the filing of an appropriate application or information and the subsequent

investigation of that application or information.

134.19: Disciplinary Action

(1) Grounds for Disciplinary Action. Any license or registration issued under 205 CMR 134.00 may be conditioned, suspended, or revoked, if the commission or the Bureau finds that a licensee or registrant has:

- (1) been arrested or convicted of a crime while employed by a gaming establishment and failed to report the charges or the conviction to the commission;
- (2) failed to comply with M.G.L. c. 23K, § 13; or
- (3) failed to comply with any provision of M.G.L. c. 23K or 205 CMR pertaining to licensees and registrants.

(2) Complaints. Any person may file a complaint against any person licensed or registered in accordance with 205 CMR 134.00. All complaints relative to a licensee or registrant must be in writing on a form provided by the Commission. All complaints must be received by the Commission within one year of the date of the alleged wrongdoing. The Commission or Bureau may itself initiate a complaint at any time notwithstanding the date of the alleged wrongdoing.

(3) Basis of Complaint. A complaint must allege wrongdoing by a licensee or registrant in the form of a violation of 205 CMR ~~134.19(1)~~ and/or M.G.L. c. 23K.

(4) Review and Investigation of Complaints. Every complaint filed shall be reviewed by the commission or its designee. A hearing may be convened, the complaint may be forwarded to the Bureau, or the complaint may be dismissed in the discretion of the commission or its designee. The Bureau may, if it elects, investigate a complaint prior to scheduling a hearing. In its discretion, the Bureau may resolve informal patron complaints without formal investigation, notification of parties, or convening a hearing. Failure of a complainant to cooperate in the investigation may be grounds for dismissal of a complaint.

(5) Notice of Hearing. If the Bureau determines that a hearing shall be held to resolve a complaint, reasonable notice shall be provided to the complainant and the licensee or registrant. Mailing of notice to the address on record with the Commission, or emailing the notice to the address provided by the licensee or registrant on their application for licensure or registration, shall be deemed satisfactory notice. The notice of hearing shall contain:

- (a) The name of the complainant;
- (b) The date, time and place of said hearing;
- (c) The location of the incident giving rise to the complaint;-

(6) Hearing. Hearings convened pursuant to 205 CMR 134.19 shall be conducted pursuant to 801 CMR 1.02: *Informal/Fair Hearing Rules* and M.G.L. c. 30A. Any party may be represented by legal counsel. All parties shall be permitted to present an opening statement, testify on their own behalf, cross-examine all witnesses, present any relevant witness testimony, present any relevant documentary evidence, and offer a closing argument. The Bureau may question any witness and include any records kept by the commission as exhibits. The Bureau may conclude the hearing at any time and issue a decision based on the evidence presented.

If a licensee or registrant does not appear for the hearing, the Bureau may conduct a hearing in his or her absence and render a decision based upon the evidence presented, but only after making a finding that the licensee was provided notice as required by 205 CMR 134.19(5).

The Bureau may designate a hearing officer to convene a hearing and either make a recommendation or issue a decision on its behalf.

(7) Subpoenas. The Bureau may issue a subpoena in accordance with M.G.L. c. 30A, § 12 requiring the attendance and testimony of witnesses and the production of any evidence, including books, records, correspondence or documents, relating to any matter in question in the proceeding.

(8) Decisions and Discipline of License and Registration Holders. The Bureau shall issue a written decision after the hearing. Decisions shall be issued in a reasonably prompt manner. The Bureau may suspend a license or registration for a fixed period of time, revoke a license or registration permanently, or issue a reprimand the licensee or registrant. In conjunction with or in *lieu* of these disciplinary measures, the Bureau may assess a fine pursuant to M.G.L. c. 23K, § 36, and recoup the costs of investigation. Any license or registration that is suspended or revoked shall be forwarded to the Bureau immediately. A person whose license is revoked may apply in writing to the commission for reinstatement no sooner than five years from the date of the revocation.

(9) Appeals.

(a) Any person aggrieved by a decision of the hearing officer may, in writing, request review of said decision by the commission. The filing of such a petition shall not serve to stay any disciplinary action taken by the hearing officer.

(b) The commission may review such decision at its discretion. Such review is an administrative review that shall be based solely on the administrative record and is not to be construed as a second hearing on the same complaint(s). After review, the commission may either deny the petition or remand the matter to the hearings officer for further proceedings as directed. The filing of an appeal with the commission shall serve to toll the timing provisions of M.G.L. c. 30A, § 14 until such time as a final decision is rendered by the commission.

(c) Any person aggrieved by a decision of the hearings officer or the commission may appeal such decision in conformance with M.G.L. c. 30A, § 14.



September 6, 2016

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

RE: Blue Tarp reDevelopment Comments on Proposed Revisions to 205 CMR 134.00

To Whom It May Concern:

In response to the Massachusetts Gaming Commission's (the "Commission") request for comments on proposed changes to 205 CMR 134, *Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations*, Blue Tarp reDevelopment, LLC ("MGM Springfield") submits the following comments on the revised draft regulations to the Commission.

MGM Springfield appreciates the Commission's and its staff's commitment to continuously review its regulations to ensure that they most efficiently and effectively achieve the goals of G.L. c. 23K (the "Gaming Act"). Nowhere is such an approach more critical than the requirements and processes for employee and vendor registration and licensing. In creating the Gaming Commission and its regulatory structure, the Legislature recognized the need to ensure "public confidence in the integrity of the gaming licensing process" while at the same time "to provide for new employment opportunities in all sectors of the economy, particularly opportunities for the unemployed" and "promote small businesses". G.L. c. 23K, § 1. Accordingly, registration and licensing regulations should recognize the need of large, complex and multi-faceted businesses to operate efficiently, thereby providing economic opportunities to the greatest number of people and businesses in the Commonwealth, while steadfastly protecting the integrity of gaming in the Commonwealth.

The proposed changes to the vendor and employee licensing regulations are all designed to align the Gaming Act's goals by focusing the Commission's resources where the risk to the integrity of gaming and the public interest is the greatest while providing efficiencies and less restrictive regulatory requirements where little risk exists to justify the cost and burdens of compliance. As

further set forth below, MGM generally supports the proposed changes to 205 CMR 134 with some additional modifications. MGM also supports the Commission's continuing review of the Gaming Act and its regulations for any potential adverse impacts on the ability of gaming licensees to meet the Gaming Act's employment and economic development goals.

The addition of a de minimus exception for nongaming vendor registration- 205 CMR 134.04(6)(o)

MGM Springfield strongly supports the proposed change to 205 CMR 134.04(6) to add an exemption from nongaming vendor registration based on a reasonable annual spending threshold ("*de minimus* exemption"). MGM Springfield recommends that the *de minimus* exemption be initially set at \$10,000.00 annually. Adding this exemption will provide operational flexibility for gaming licensees for low dollar purchases and eliminate the registration requirement for many small businesses while allowing the Division of Licensing to focus its resources on vendors that are the recipients of the vast majority of gaming licensee spending.

In creating a *de minimus* exemption, Massachusetts would join the majority of other non-tribal, US gaming jurisdictions that either exempt nongaming vendors from registration or licensing requirements based on a purchasing threshold or do not require any form of mandatory registration or licensing whatsoever for nongaming vendors. *See Summary of State De Minimus Exemption Threshold Applicable to Non-Gaming Vendors* attached as Exhibit A. For example, Missouri and Mississippi do not require nongaming vendors to be registered or licensed. Likewise, New Jersey does not require nongaming vendors to be licensed. Although New Jersey does require all nongaming vendors to be registered, the initial registration process is highly abbreviated and is completed and filed electronically by the gaming licensee (not the vendor). *Id.* Pennsylvania, Louisiana and Michigan each have significantly higher registration/licensure thresholds than what is being considered in Massachusetts (i.e., \$100,000, \$200,000 and \$50,000, respectively). *Id.* Even Maryland, which has a nongaming vendor registration/licensure system most closely analogous to Massachusetts, recently increased its *de minimus* registration exemption from \$2,500 per year to \$10,000 per year. *Id.*

Creation of a *de minimus* exemption for a nongaming vendor paid less than \$10,000 annually will likely only exempt a small fraction of the total annual spending by a gaming licensee from the vendor registration requirements while substantially conserving the gaming regulator's limited resources. For example, in Michigan there are approximately 818 vendors receiving payment from MGM Detroit (in the annual pool sampled). Applying a theoretical \$10,000 *de minimus* exemption to the pool of 818 vendors would exclude less than 1% of MGM Detroit's annual spending. Remarkably, however, the \$10,000 threshold would exclude 467 of the 818 vendors from the vendor registration requirements. Put another way, without the *de minimus* exemption, the gaming regulator's limited administrative resources would be squandered attempting to regulate 467 vendors representing less than 1% of total annual spending. Those resources are probably much better directed regulating the remaining 351 vendors that represent *over 99%* of total annual spending. Indeed, the top 25 vendors at MGM Detroit were paid

between \$82M and \$1.4M annually while the bottom 25 vendors to MGM Detroit were paid between \$120 and \$10. Similar results are expected for MGM Springfield.¹

Of course, none of this is to suggest that the exempted pool of 467 vendors would escape the scrutiny of the Commission and its staff. A gaming licensee's vendor spending and disbursements are reported bi-monthly to the Commission as part of the Commission's Uniform Standards of Accounting Procedures and Internal Controls, 205 CMR 138.06(2). For example, the current format for the bi-monthly disbursement report submitted by MGM Springfield includes disbursements to all registered or licensed vendors under 205 CMR 134.06 as well as disbursement to all other entities exempt from the registration or licensing requirements. Simply put, exemption from the registration requirement does not exempt the reporting of payments to such vendors to the Commission. Accordingly, even if a *de minimus* exemption is adopted, the Commission will continue to have a record of payments to all such vendors, and the Commission certainly retains the discretion and right to require any such vendor to register if the facts and circumstances so warrant. The *de minimus* exemption simply provides the Commission with a more surgically precise tool for regulating low dollar value nongaming vendors.

A *de minimus* exemption will also provide gaming licensees needed flexibility to quickly make comparatively small dollar purchases with a business to cover miscellaneous items and services as business needs dictate. These purchases could include sandwiches for a staff lunch, printed materials at a local copy store to magazine subscriptions, off the shelf or downloadable software or other office products. Registering nongaming vendors for these types of transactions adds very little to the integrity of gaming and, in some cases, serves as a barrier to doing business with a gaming licensee which is contrary to the Gaming Act's goal of promoting small businesses. A few hundred or even a few thousand dollars' worth of business does not justify the time and resources needed to register as a nongaming vendor.

In addition to setting a threshold of \$10,000, MGM Springfield also recommends further amendment to the proposed draft *de minimus* exemption to provide a clear process for an exempted vendor to register as a nongaming vendor once the \$10,000 threshold is reached:

(o) Upon submission of a written certification by a gaming licensee, any person providing goods or services not directly related to gaming to whom the gaming licensee reasonably expects to pay an amount less than **\$10,000** within a 12-month period. **If a vendor exceeds the \$10,000 threshold, the Division of Licensing shall forward notice to the vendor of its obligation to register as a non-gaming vendor. Within 45 days of service of the notice, the vendor shall submit a completed Non-Gaming Vendor Registration Form as set forth in 205 CMR 134.07(4) or file a written request to the Division of Licensing for a determination that a registration is not required as a non-gaming vendor on**

¹ At the August 18, 2016 Public Hearing of the Commission, Commission staff was asked about applying a \$10,000 *de minimus* exemption to the current vendor pool providing goods and services to Plainridge Park Casino. Staff indicated that applying a \$10,000 *de minimus* exemption would exclude "almost a third" of Plainridge's vendors from the registration requirement. Massachusetts Gaming Commission Public Meeting No. 198, Transcript at p. 257. Staff was not asked what percentage of total annual spending this group of Plainridge's potentially exempted vendors constitutes. An analysis of the exemption should capture the impact on total spending, not just total number of vendors.

the grounds that it is not providing goods or services on a regular or continuing basis.

Additional Vendor Registration and Licensing Exemptions 205 CMR 134.04(6)(d).

MGM Springfield supports the proposed change to the exemption for legal, accounting and financial services in 205 CMR 134.04(6)(d) eliminating the term “professional” before “legal and adding “lobbying” to this exemption. Legal services are recognized as a professional service making the “professional” qualifier unnecessary and redundant. Lobbying services like accounting, legal and financial services is a regulated industry that requires registration, disclosure of activities and is under the supervision of the Commonwealth’s Secretary of State’s Office. There are significant restrictions on lobbyist interaction with the executive and legislative branches as well as limits on fee arrangements, gifts and political contributions *See* G.L. c. 3, §§ 39 –50. As lobbying services are independently regulated and reported to the Secretary of State’s Office, registration as a nongaming vendor is redundant to the lobbying registration requirements for the purposes of protecting the public interest. Louisiana, Maryland and Pennsylvania all exempt lobbyists from nongaming vendor registration and licensing requirements. *See*, COMAR 36.03.02.17(C)(11); La. Admin. Code tit. 42, § 2108(c)(10); and 58 Pa. Code § 437a.1(d)(11). In Michigan, lobbyists may be exempted from nongaming vendor registration requirements under broad waiver authority where a “person or field is regulated by another regulatory agency in Michigan. *Michigan Gaming Control Board Resolution No. 2015-01 Regarding Vendor Exemptions and Waivers from Supplier-Licensing Requirements Pursuant to Rule 432.1322(4) and Rule 432.1223 and Delegation of Authority to the Executive Director to Grant Vendor Exemptions and Waivers (4)(b).*

In addition to supporting the proposed changes to 205 CMR 134.04(6), MGM Springfield requests that the Commission add an additional exemption for publicly traded companies, other than a Gaming Vendor Primary, in good standing and up to date with all required filings. Similar to the justification for the services detailed in exemption (d), a publicly traded company is subject to heavy regulatory oversight and disclosure under the auspices of the Security and Exchange Commission (SEC) pursuant to the Securities Acts of 1933 and 1934. A publicly traded company is required to be registered with the SEC and must regularly disclose certain business and financial information through annual and periodic public reporting. These Acts also prohibit certain types of conduct and provide the SEC with broad investigatory and disciplinary powers. This oversight was further enhanced through subsequent Acts of Congress since the late 1930’s, most recently the Sarbanes-Oxley Act of 2002 and Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Collectively, these laws ensure the integrity of publicly traded companies and set significant requirements for corporate governance, disclosure and transparency consistent with the Commission’s goals of ensuring the high character of vendors and suppliers doing business with gaming licensees.

Several US gaming jurisdictions have an exemption for publicly traded companies that provide nongaming goods or services to a gaming licensee. In Michigan, the executive director of the Michigan Gaming Control Board (MGCB) can exempt a publicly traded domestic company under the regulation of the SEC, whose annual overall gross revenues from doing business with casino licensees constitute less than 5% of the publicly traded corporation's annual gross

revenues. *See MGCB Resolution No. 2015-0.* In Louisiana, publicly traded companies subject to regulation by the SEC, who are in good standing and are current with required filings are exempt from obtaining a non-gaming supplier permit. La. Admin. Code tit. 42, § 2108(c)(13). Pennsylvania also exempts publicly traded companies that are under the regulation of the SEC if the publicly traded company submits a completed Publicly Traded Gaming Service Provider Form to the Bureau of Licensing, agrees to abide by gaming service provider responsibilities and pays a fee. 58 Pa. Code § 437a.1(g).

There are practical challenges to registering or licensing publicly traded companies including vast corporate structures that often span the globe. Registering these types of entities is not practicable and would require significant Commission resources. Moreover, considering the potential for business with Massachusetts gaming licensees as compared to large corporate revenues, many publicly traded companies would likely take a pass at doing business with a Massachusetts licensee rather than go through the licensing and registration process – especially for a "one off" transaction. Of course, once again, the Commission certainly retains the discretion and right to require any such company to register or be licensed if the facts and circumstances so warrant.

Proof of Business Relationship, 205 CMR 134.08(1)(c)

MGM Springfield supports the Commission’s amendment to the vendor and employee licensing regulation that requires a vendor to provide “proof of a business relationship” to the Division of Licensing in connection with a vendor registration application. Providing proof of a business relationship with a licensee will ensure that only vendors with a likelihood of doing business with a licensee are eligible to apply for a nongaming vendor license. In determining what the form of “proof” will be, MGM Springfield requests that the Commission avoid requiring documentation that could be construed as creating a contractual relationship or would require the disclosure of potentially confidential or proprietary contract terms.

Enhanced Licensing Division discretion to designate a nongaming vendor a gaming vendor secondary. 205 CMR 134.04(3)

MGM Springfield supports providing additional discretion to the Division of Licensing to designate a nongaming vendor a gaming vendor secondary. Providing the Licensing Division this discretion will allow the Division to avoid expending resources in connection with a full licensing investigation where the facts and circumstances demonstrate such a process is not necessary to protect the public interest. This discretion can be utilized where a registered nongaming vendor has reached the gaming secondary license threshold but is wrapping up a contract or where the nongaming vendor is under an existing regulatory structure. Other criteria may include the nature of the work, the size of the business and its relationship to or presence at the gaming establishment.

Similar to other changes to the vendor licensing regulations, this proposed change will lessen the burden of a full license review and application on businesses seeking to provide goods and services to a gaming licensee. This additional discretion will serve to encourage small and medium businesses to compete for gaming licensee contracts.

Vendor and Employee Registration and Licensing Efficiencies

Both the IEB and Division of Licensing have recommended changes to the employee and vendor licensing regulation to make the registration and licensing process more efficient for prospective employees and vendors and better deploy the Commission's resources. MGM Springfield supports these changes including but not limited to:

- Changes to Scoping Requirements for Gaming Vendor and Gaming Vendor Secondary Qualifiers, 205 CMR 134.04(4)
- Greater Discretion to Change Application Forms, 205 CMR 134.07
- Changes to the Hearing and Appeal Process for Employees and Vendors Denied Registrations or Licenses, 205 CMR 134.09(2)
- Changes to the Rehabilitation Process, 205 CMR 134.10(4)
- Administrative Closure of Applications, 205 CMR 134.14

Additional Topics for Comment

MGM Springfield appreciates the Commission's invitation to provide comments on additional topics related to employee and vendor licensing including but not limited to the gaming service employee rehabilitation process; interpretation and implementation of Criminal Offender Record Information (CORI) requirements; utilization of the reciprocity enabled in 31(f); registration process for non-gaming vendors; registration process for gaming service employees; review of the license application forms; and the development of a routine process for overall regulatory review.

First, regarding the interpretation and implementation of Criminal Offender Record Information (CORI) requirements, specifically as applied to Gaming Service Employees, this topic is worthy of further review and discussion separate from the current rule making process. This topic was identified by MGM Springfield in its RFA 2 Application as a key post licensing area of concern. The issue has been discussed by the Commission in the past and was summarized in a March 27, 2014 Memorandum to the Commission from the Law Firm of Michael & Carrol, consultants to the Gaming Commission, where they concluded the following:

It is our view that the mandatory disqualification of gaming service employees who have convictions of the type described in Section 16(b) works at cross - purposes with the Legislature's policy declaration at section 1(5). We believe that, given the nature of the non-gaming functions served by [gaming] service employees, the restrictions of Section 16(b) are not necessary in order to maintain the appropriate degree of honesty and efficiency in a casino.

See, Memorandum to Stephen Crosby from Michael & Carroll re; Gaming Service Employee Licensing Standards, March 27, 2014 attached hereto as Exhibit B. While the hiring of gaming service employees is likely 18 – 20 months away, the Commission should convene a working group to make specific recommendations to address the potential impact of the mandatory disqualification of gaming service employees on the hiring goals of the category 1 licensees and the overall intent of the Gaming Act.

Turning to the registration requirements for nongaming vendors and gaming service employees, MGM Springfield supports Chairman’s Crosby’s recommendation of streamlining these processes as much as possible to alleviate the potential burden of registration. Massachusetts Gaming Commission Public Meeting No. 198, Transcript at pp. 207-208. The Gaming Commission has significant authority to determine what type of information a nongaming vendor and gaming service employee must produce for registration purposes. *See* G.L c. 23K, § 30 and § 31. Under both sections, nongaming vendors and gaming service employees “shall produce such information as the commission may require.” *Id.*

The Commission has taken some important steps in this regard including providing relief to nongaming vendors from the fingerprinting requirement. Further streamlining of the nongaming vendor registration requirements should be considered in addition to increasing exemptions and other efficiencies. The Commission may wish to consider a New Jersey-like registration requirement. In New Jersey, nongaming vendors provide the casino licensee with a simple two-page vendor registration form, which the casino licensee then files electronically with the New Jersey Division of Gaming Enforcement (“DGE”). Then, within the next 30 days the vendor completes and signs a 4-page Supplemental Disclosure form, and files same with the DGE. A similar process could be utilized for nongaming vendors in Massachusetts. Importantly, the Commission could retain discretion to require further information and investigation of any vendor providing a good or service to a gaming licensee. Similar efficiencies and registration requirements can also be explored with gaming service employees.

Finally, MGM Springfield supports the Commission’s interest in periodically reviewing its regulations. Commission staff has been very willing to discuss the impacts of its regulations on the licensees’ business practices and make adjustments where warranted. The Commission should continue to review its regulations, some of which were promulgated prior to the award of licenses in Massachusetts with an eye toward efficiencies and eliminating unnecessary requirements. As the category 1 licensees become operational, revisiting the operation related regulations may be warranted as well.

MGM Springfield fully recognizes “the professionalism of the IEB and integrity of the results that professionalism has produced” for the Commonwealth as recently noted by Chairman Crosby in summarizing the importance of vendor and employee licensing issues. MGM Springfield strives for the same level of professionalism and integrity in the selection of its employees and vendors to staff and service MGM Springfield. MGM Springfield shares the Commission’s interest in only doing business with reputable organizations and employing people with the requisite qualities and integrity and have our own processes in place to that end. At the same time, MGM Springfield is committed to meeting its hiring, diversity and purchasing goals including hiring 35% of gaming establishment employees from the City of Springfield, 50%

minorities, 50% women and 2% veterans as well as spending \$50 million per year on local vendors from the Greater Springfield Area. We appreciate the Commission's thoughtful and collaborative approach to these issues and partnership in achieving these goals and the goals of the Gaming Act.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Seth N. Stratton". The signature is fluid and cursive, with the first name "Seth" being the most prominent.

Seth N. Stratton
Vice President & General Counsel

BLUE TARP REDEVELOPMENT LLC

Exhibit A

De Minimis Exemption Thresholds Applicable to Non-Gaming Vendors

A. States in which Non-Gaming Vendors Must be Licensed

1. *Pennsylvania*

In Pennsylvania, gaming service providers (i.e., persons who provide non-gaming goods or services to gaming facility operators, 58 Pa. Code § 401a.3) that will do or anticipate doing less than \$100,000 in business with a single gaming facility operator or multiple gaming facility operators in a consecutive 12-month period are exempted from vendor registration and certification requirements. See 58 Pa. Code § 437a.1(a)(1)

2. *Louisiana*

Non-gaming vendors that will do or anticipate doing \$200,000 or less in business per calendar year with a Louisiana gaming facility are exempt from the Louisiana non-gaming supplier permit requirement. See LA Rev. Stat. § 27:29.3A(1)

3. *Michigan*

Non-gaming vendors providing \$50,000 or less in goods or services to a Michigan gaming facility are automatically exempted from the Michigan vendor licensing requirements. Michigan Gaming Control Board (“MGCB”) 2015 Resolution No. 2015-01.¹ Any non-gaming vendor that does or anticipates doing between \$50,000 and \$400,000 in business with a Michigan gaming facility in any 12-month period may apply to the MGCB for a vendor exemption. *Id.* at pg. 5; see also Rule 432.1322(1) & (3) (requiring non-gaming vendors doing business “on a regular and continuing basis” with a Michigan gaming facility, i.e., providing goods or services between \$200,000 and \$400,000 in a 12-month period, to obtain a supplier’s license).

4. *Maryland*

Non-gaming vendors are presently exempt from the vendor registration requirements if the vendor does or anticipates doing less than \$2,500 in business with a Maryland gaming facility in a calendar year. See COMAR 36.03.02.17(D). In February 2016, the Maryland Lottery and Gaming Control Commission approved a regulatory amendment to: (1) increase the registration exemption threshold to \$10,000; and (2) entirely exempt from registration vendors of goods or services that a video lottery operator purchases solely to be given to a player. The amendment is anticipated to be effective in the third quarter of 2016.

¹ Available at: http://www.michigan.gov/mgcb/0,4620,7-120-57615_58037-345200--,00.html.

B. States in which Non-Gaming Vendors Need Not be Licensed

1. Missouri

Non-gaming vendors are not, and have not historically been, required to be licensed in Missouri. Supplier's licenses are required for manufacturers and sellers of gaming-related equipment and supplies. Mo. Code Regs. Ann. tit. 11, § 45-4.200.

2. Mississippi

Non-gaming vendors are not, and have not historically been, required to be licensed under the Mississippi Gaming Control Act or regulations promulgated thereunder. Rather, licensure is required only for manufacturers of gaming and associated equipment, distributors of gaming and associated equipment, and operators. Rule 12.2(a); see Miss. Code Ann. § 75-76-33. Further, the Executive Director of the Mississippi Gaming Commission may require licensing of any person that provides "services or property to a gaming licensee under any arrangement pursuant to which the person receives payments based on earnings, profits or receipts from gaming." Miss. Code. Ann. § 75-76-63.

3. New Jersey

The statutory requirement that non-gaming vendors be licensed was repealed. However, all vendors must be registered to do business with New Jersey casino licensees. N.J.S.A. 5:12-92(c)(1). But, vendor registration is now a highly abbreviated process. The vendor provides the casino licensee with a simple two-page vendor registration form, which the casino licensee then files electronically with the New Jersey Division of Gaming Enforcement ("DGE"). Then, within the next 30 days the vendor completes and signs a 4-page Supplemental Disclosure form, and files same with the DGE.²

The New Jersey gaming regulations contained an exemption for transactions involving "[p]ayments for goods and services totaling \$1,000 or less made pursuant to a contract or purchase agreement not in excess of \$1,000 if the casino licensee or applicant reasonably and in good faith believes that no other goods or services will be provided to it by the same vendor." N.J.A.C. 19:43-10.5 (2011). The exemption was repealed as of June 7, 2012 in connection with the statutory repeal of the requirement that non-gaming vendors be licensed.

² Available at: <http://www.nj.gov/oag/ge/docs/Forms/VendorRegistrationSupplementalDisclosure.pdf>.

4. Illinois

Absent extraordinary circumstances, non-gaming vendors are not, and have not historically been, required to apply for a supplier's license. Although the Illinois Riverboat Gambling Act states that a supplier's license is required to "suppl[y] any equipment, devices, or supplies to a licensed riverboat gambling operation," Illinois Gaming Board ("IGB") "may waive this requirement for any specific product or products if it determines that the requirement is not necessary to protect the integrity of the game." 230 Ill. Comp. Stat. Ann. 10/8(e); see also Ill. Admin. Code tit. 86, § 3000.200(b)(6). As a matter of practice, non-gaming vendors file an application with the riverboat gambling facility with which it intends to do business, and will not be required by the IGB to submit to the supplier licensing requirement.

Exhibit B



MICHAEL & CARROLL

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

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MEMORANDUM

REPLY TO: POINT PLEASANT OFFICE
ATLANTIC CITY OFFICE

TO: Stephen Crosby, Chairman
FROM: Michael & Carroll
SUBJECT: Gaming Service Employee Licensing Standards
DATE: March 27, 2014

You have asked us to review the present standards established under M.G.L. Chapter 23K ("Act"). You have further requested that we compare those standards to those utilized in other jurisdictions and then provide you with our suggestions about whether it might be useful to revise them in order to better achieve the aims of the Gaming law.

For the reasons that follow, we do recommend that the Commission suggest legislative changes that would provide the agency with greater discretion in determining the qualification of applicants for gaming service employee registration.¹

1. Present Statutory Standards

Section 30(c) of the Act provides that:

¹ We have taken the information contained here from the applicable statutes and regulations. It is our experience that sometimes gaming agencies will promulgate informal policies beyond the words of the published rules. These policies are also often changed. We cannot speak definitively regarding every state's informal practice. We have tried to make this review as comprehensive as possible, but we note this caveat.

All other employees in a gaming establishment who are not considered to be gaming employees, key gaming employees or who have restricted access to an area of the gaming establishment or knowledge of security procedures, shall be required to register with the bureau as a gaming service employee and shall produce such information as the bureau may require to become registered under this chapter.

Thus, "gaming service employees" are those persons whose work at the gaming establishment is the least sensitive in terms of the integrity of operations. When determining the qualifications of these persons for permission to work in these positions, Section 16(b) of the Act, in part, requires the Commission to deny registration if the applicant:

. has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that for convictions which occurred before the 10-year period immediately preceding application for licensure, an applicant may demonstrate, and the commission shall consider, the applicant's rehabilitation and whether such conviction should not be an automatic disqualification under this section
.....

Accordingly, under this scheme, reading these two statutory provisions together, the Commission is now required to deny permission to persons who want to assume the least sensitive jobs in a casino if those persons have felony or other theft or fraud convictions within ten years of their application. This rule should be analyzed in the context of one of the principle, enunciated purposes of casino legalization in the Commonwealth. Section 1((5) of the Act establishes that:

the Commonwealth must provide for new employment opportunities in all sectors of the economy, particularly opportunities for the unemployed

It is our view that the mandatory disqualification of gaming service employees who have convictions of the type described in Section 16(b) works at cross -purposes with the Legislature's policy declaration at Section 1(5). We also believe that, given the nature of the non-gaming functions served by casino service employees, the restrictions of Section 16(b) are not necessary in order to maintain the appropriate degree of honesty and efficiency in in a casino.

We buttress these opinions with a survey of the standards now utilized by other jurisdictions. In the following section, we will explain those standards.

2. Survey of Other Jurisdictions

We do not offer the comparisons below as an exhaustive list. To do so would be unnecessary and duplicative. We have chosen what we consider the major gaming jurisdictions in the United States. Should you want additional jurisdictional comparisons, please let us know.

New Jersey

Historically, New Jersey licensed all facility employees, including those working solely within the hotel. Gradually, New Jersey lowered those standards. First, the state reduced the standard to registration only. Recently, all pre-approval requirements were dropped. At present, employees who work in non-gaming capacities (analogous to casino service employees in the Commonwealth) are not licensed or registered at all.

In fact, the present licensing system in New Jersey does not even require the licensing of casino employees (defined in New Jersey as those, generally who perform services in the gaming areas, including dealers, et al). This category of employees is only registered and their registration standards include rehabilitation without any mandatory disqualifications.

Nevada

Nevada registers only its "gaming employees" This category is defined to include those positions traditionally associated with direct involvement in gaming activity. It expressly excludes "barbacks or bartenders whose duties do not involve gaming activities, cocktail servers or other persons engaged exclusively in preparing or serving food or beverages." The standard for registration of these employees is discretionary. The Board is not required to deny any applicant. The regulations establish standards within which the Board "may" deny a registration. Approval of persons who work at the gaming facility but are not "gaming employees" are not handled by the Board. Some are required to obtain only Sheriff's work cards.

Ohio

Many years after the New Jersey initial experience, Ohio commenced its operations by licensing only key employees and casino gaming employees. In its definition of "casino gaming employee," the legislation expressly exempts, "an individual whose duties are related solely to non-gaming activities such as entertainment, hotel operations, maintenance, or preparing or serving food and beverage." This description would apply to Massachusetts' "gaming service

employees.” Therefore, Ohio does not require pre-approval of “casino service employees”, let alone require any mandatory disqualification for this category.

Pennsylvania

Pennsylvania issues permits to those persons considered non-gaming employees. Under the controlling legislation, this category includes, “bartenders, cocktail servers or other persons engaged solely in preparing or serving food or beverages, clerical or secretarial personnel, parking attendants, janitorial, stage, sound and light technicians and other nongaming personnel as determined by the board.” These employees would be considered “casino service employees” in Massachusetts.

Applicants for these permits are addressed under a discretionary standard otherwise applicable to all applicants. The governing regulation states in its introduction to the disqualification criteria that:

An application for issuance or renewal of a license, permit, certification or registration may be denied; or a license, permit, certification or registration may be suspended or revoked if”

Accordingly, Pennsylvania provides for no automatic mandatory disapproval of persons who would, under Massachusetts parlance, be considered “casino service employees.”

Mississippi

The Mississippi system requires that those considered “gaming employees” obtain licenses. For this category of employee, the law does contain mandatory disqualification for a wide variety of criminal conduct. However, the definition of “gaming employee” to whom these standards would apply states that, “gaming employee does not include bartenders, cocktail waitresses or other persons engaged in preparing or serving food or beverages unless acting in some other capacity.” There are no pre-qualification requirements for those persons exempted from the “gaming employee” category. Thus, here, too, those who would be considered “gaming service employees” in Massachusetts would have no mandatory disqualifications applied to them.

Missouri

Missouri does contain a mandatory disqualification standard for employees. The State divides employees into two Categories. Category Level I are those who would be considered key employees. Level II includes those who would clearly be considered gaming-related persons, but it also is broad enough to potentially include, at the discretion of the Gaming Commission, some employees who might be considered "gaming service employees" in Massachusetts. The mandatory disqualification applies to both Level I and Level II employees. However, it is temporally more limited than the mandatory terms of the Commonwealth.

Level I and Level II employee applications may be denied for, among other things, any criminal record. However, those applications must be denied for convictions **within 5 years** for convictions for offenses involving generally gambling, theft, fraud or dishonesty. Thus, while Missouri, like Massachusetts, includes a mandatory disqualification requirement for persons who may be similar to "casino service employees", that standard applies only to those within 5 years of application, not 10 years as in the Commonwealth.

Iowa

Iowa is somewhat like Missouri. All persons working on the riverboat casinos must be licensed. There is also a mandatory disqualification requirement for convictions for felonies; theft or fraudulent practices in excess of \$500; using an alias for fraud; illegal bookmaking; and for certain serious or repeated misdemeanors. . However, like Missouri, the mandatory criteria apply only for convictions within 5 years. If the conviction is more than 5 years old, then a showing of rehabilitation is available.

Michigan

Michigan establishes three levels of employee licensure. Level III, the lowest level, includes persons who directly effect gaming but do not come in contact with gaming. Examples include beverage servers, wait staff, maintenance staff and housekeeping personnel, but only those with access to the areas where gaming is conducted. On this basis alone, the Michigan licensing scheme does not include persons who would be "casino service employees" in Massachusetts. However, the system does allow the Board to designate others for licensing in this category at its discretion.

The standards for licensing employees of all Levels are the same and they DO include mandatory disqualification. The rules prevent issuance of a license to any applicant with a felony conviction or with misdemeanor convictions for gambling, theft, or fraud.² Therefore, Michigan could be said to be similar in its treatment of "casino service employees", but only in the case of the Board reaching out specially for one of those persons and including them as a special Level III licensee. In the main, Michigan does not provide an automatic disqualification for persons who would be "casino service employees".

Indiana

Indiana is the only state on our list that does provide for automatic disqualification of persons who would be "casino service employees" in Massachusetts. Like Michigan, Indiana has three levels of employee license. Level 3 is the lowest level. Unlike Michigan, however, the category of Level 3 is much broader. Not only can the regulators designate anyone to require Level 3 scrutiny, but the Level 3 designation applies to "any employee of a riverboat gambling operation whose duties are performed on the riverboat . . ." Accordingly, this would apply to many, if not all, "casino service employees."

In addition, the standard applied to all Levels of employee, including Level 3, contains a mandatory denial for any felony conviction. There is no rehabilitation available and there is no time limit.

3. Conclusion

Based on our experience, and on the above analysis of other jurisdictions, we believe that the present statutory standard for the issuance of casino service employee registration is too harsh. We say this with a full appreciation for the need to strictly control casino operations and the people who staff them. However, we come to this conclusion for three basic reasons:

1. The type of work that will be undertaken by casino service employees will not directly impact on the integrity of casino operations. The focus of gaming control should be on the conduct of gaming. Casino service employees will not be involved in that activity.

² There is also a provision in the Michigan statute that seems to contradict the mandatory standard. It provides only that the Board "may" deny applicants on the basis of these convictions. We have used here the most restrictive interpretation.

2. It is an important stated policy of the Act to foster new employment opportunities for the disadvantaged and the unemployed. Often, sadly, those within this demographic will be more likely to have had some involvement with law enforcement in their past. It is, therefore, counter-productive to render the job possibilities created by the Act to be unavailable to the people who need them most.
3. The experience of other jurisdictions has illustrated that rigid licensing standards for the casino service employee category are not necessary for effective gaming regulation. Most major jurisdictions either don't license this type of employee at all or do so with discretionary standards. We point especially to the experience of New Jersey where the level of scrutiny of this type of employee has continually lessened. It has gone from full licensing to now, no pre-qualification whatsoever.

4. Recommendation

Based on all of the above, we would recommend two potential changes to the Act as it applies to the standards for casino service employees.

Our first recommendation is, we recognize, likely too extreme at this time. It is common at the outset of gaming in any jurisdiction that stricter standards are more popular. It takes a period of successful experience before those standards can be loosened. However, if feasible, we would recommend that the requirement for registration of casino service employees be removed in its entirety. To do so would not interfere with the integrity of gaming. In fact, it could conceivably improve it by allowing the Commission to focus its attention on more sensitive matters.

Our second recommendation would be to make a less radical revision to the present language. We suggest the following:

"Section 16(b) The commission shall deny an application for a *gaming* license [or registration, other than a gaming license] or a license for a key gaming employee under this chapter if the applicant: has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that (a) for *an applicant for a casino employee license*, convictions which occurred before the 10-year period immediately preceding application for licensure, and (b) for *applicants for casino service employee registrations*, convictions which occurred at any time, an applicant may demonstrate [remainder remain unchanged] "

MICHAEL & CARROLL
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We hope this information is helpful to you. We are, of course available to discuss this with you at your convenience. Thank you.



*Investigations and
Enforcement Bureau*

September 22, 2016

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

Massachusetts Gaming Commission
101 Federal Street
Boston, MA 02110

RE: SUITABILITY INVESTIGATION OF MGM SPRINGFIELD
REDEVELOPMENT, LLC AND MGM RESORTS REGIONAL OPERATIONS,
LLC (TWO NEW ENTITY QUALIFIERS FOR BLUE TARP
REDEVELOPMENT, LLC)

Dear Chairman Crosby and Commissioners:

Blue Tarp reDevelopment, LLC (Blue Tarp) is a Category 1 casino licensee in Massachusetts. Since the issuance of the license, Blue Tarp has advised the Investigations and Enforcement Bureau (IEB) that it has organized its operations in a way that will utilize two subsidiaries of Blue Tarp's parent company, MGM Resorts International. The IEB determined under 205 CMR 116.02(i) that these two entities, MGM Resorts Regional Operations, LLC (Regional Operations) and MGM Springfield reDevelopment, LLC (Springfield reDevelopment) should be subject to qualification by the Massachusetts Gaming Commission (MGC).

The IEB requested that the firm of Michael and Carroll conduct the suitability background investigation of both entities in accordance with G.L. c. 23K, §§ 12, 16, 31, and 205 CMR 134.10. They evaluated both entities based upon the standards set forth in M.G.L. c. 23K, §§ 12, 16, and 31, and 205 CMR 134.10, which include an evaluation of the Applicants' overall reputation, including without limitation the following criteria:

- Integrity, honesty, good character and reputation;
- Financial stability, integrity and background;
- History of compliance with gaming licensing requirements in other jurisdictions;
- Whether the Applicant is a defendant in litigation at the time of application;
- Applicant's criminal history, if any;
- Whether the applicant submitted an application that intentionally contains false or misleading information;



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- Whether the applicant committed prior acts that have not been prosecuted but form a pattern of misconduct;
- Whether and to what extent the Applicant has associations with members of organized crime or other persons of disreputable character;
- The Applicant's cooperation with the IEB in connection with the background investigation; and
- Integrity, honesty, and good character of any subcontractor.

As part of the investigation, investigators from Michael and Carroll, among other things, reviewed the materials submitted as part of the applications from Regional Operations and Springfield reDevelopment; requested and reviewed supplemental information as deemed necessary; gathered information from a variety of governmental and non-governmental sources and databases; conducted criminal records checks; verified the accuracy of information provided as part of the application; and communicated throughout the course of the investigation with representatives from each applicant entity. The Applicants were fully cooperative and forthcoming in all respects.

Under Massachusetts law, a Casino Licensee qualifier is required to establish its qualifications for licensure by clear and convincing evidence, including the statutory criteria of integrity, honesty, good character and reputation, and financial stability, integrity and background. Taking into consideration the entirety of the investigation, we recommend that the Commission find both Regional Operations and Springfield reDevelopment suitable. This letter summarizes the key aspects of the investigation.

MGM Resorts Regional Operations (“Regional Operations”)

Regional Operations was incorporated in the State of Nevada on August 26, 2014 as a limited liability company. It is wholly owned by MGM. The company is registered to do business in Maryland, Nevada, Michigan, Mississippi, and Massachusetts. MGM's operations had originally been located solely in Nevada; however, the company recently expanded those operations into other jurisdictions. Regional Operations was formed to provide efficiency in operations in its expanded facilities by centralizing administrative functions. More specifically, Regional Operations is a service company. It provides and coordinates management services to the Regional Properties. Such services include back of the house functions such as treasury, accounting, and legal. These functions at Regional Properties, including Blue Tarp, will be supervised by, and in some cases performed by, officers and employees of Regional Operations. The General Managers of the Regional Properties will report to the President of Regional Operations. In turn, the President of Regional Operations reports to the President of MGM.

Regional Operations was found suitable by the Michigan Gaming Control Board in 2015 as a discretionary qualifier and found qualified by the Maryland Lottery and Gaming Control

Agency in 2016 as a Principal Entity. There is no record of any regulatory violation in any jurisdiction for Regional Operations.

Regional Operations has no criminal record. The investigation discovered no material civil litigation naming Regional Operations as a defendant. Research of available online and print media surfaced no derogatory or negative information regarding the entity.

Michael and Carroll evaluated Regional Operations for financial suitability, integrity and background by performing financial analysis and verification of its financial information. The financial evaluation did not uncover any derogatory information that indicates that the entity does not possess the requisite financial stability, integrity and background to be found suitable. Notably, Regional Operations is a newly-formed entity with very little financial history and because of its structure and the limited nature of its operation and function, Regional Operations engages in very little financial activity. However, because of the structure of the company and its relationship to and reliance on its parent company, the financial stability of the company can be deemed suitable.

There are 10 individual qualifiers associated with Regional Operations, 6 of whom were already found suitable by the Commission in conjunction with the original Blue Tarp suitability review, and one that was found suitable by the Commission on August 18, 2016. The other three individual qualifiers are still under review and will be presented to the Commission at a later date.

MGM Springfield reDevelopment, LLC (“Springfield reDevelopment”)

Springfield reDevelopment was organized as a limited liability company in Massachusetts on May 9, 2013. It was established pursuant to Massachusetts General Laws Chapter 121A and Massachusetts Regulations 760 CMR 25 (collectively Chapter 121A). Specifically, Chapter 121A authorizes the creation of a single purpose project-specific company (“Urban Renewal Company”) for the undertaking of commercial projects in areas which are considered to be decadent, substandard or blighted. In accordance with Chapter 121A, Springfield reDevelopment was formed for the purpose of owning the real property upon which Blue Tarp’s gaming establishment is to be developed and located. Blue Tarp will lease the real property from Springfield reDevelopment and Springfield reDevelopment will collect lease payments from Blue Tarp under the lease. Springfield reDevelopment does not anticipate conducting any business other than as set forth above. At the present time, the investigation confirmed no lease has yet been entered into between Springfield reDevelopment and Blue Tarp; therefore, Springfield reDevelopment, although formed, is not yet conducting any of its intended business activities.

The investigation confirmed Springfield reDevelopment does not presently hold any gaming licenses in any other jurisdiction. The investigation also confirmed the applicant has no

other pending applications for licensure in any other jurisdictions other than the instant application with the MGC.

As the applicant entity is a newly formed Commonwealth company without an operational record, coupled with its operational absence from any other jurisdiction, the investigation confirmed there is no record of compliance or regulatory history that could be presently verified. The investigation has confirmed that neither the entity applicant nor any of its individual qualifiers have any criminal history. A civil litigation search relative to liens, bankruptcies and judgments in the Commonwealth of Massachusetts and all other states that have such information online has been conducted and none have been found. Research of available online and print media sources did not reveal any items of a derogatory or adverse nature directly naming Springfield reDevelopment and which would impact on its suitability.

As of the date of this report, Springfield reDevelopment has had no reportable financial activity and therefore a standard financial analysis was not applicable.

There are 8 individual qualifiers associated with Springfield reDevelopment, 7 of whom were already found suitable by the Commission. The other individual qualifier is still under review and will be presented to the Commission at a later date.

In conclusion, taking into consideration the entirety of the investigation, the IEB recommends that the Commission find both MGM Springfield reDevelopment, LLC and MGM Resorts Regional Operations, LLC suitable.

Respectfully submitted,



Karen Wells
Director – IEB



*Investigations and
Enforcement Bureau*

September 15, 2016

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

Massachusetts Gaming Commission
101 Federal Street
Boston, MA 02110

RE: SUITABILITY INVESTIGATION OF EVERI GAMES INC., EVERI
PAYMENTS INC., and CENTRAL CREDIT LLC, 3 APPLICANTS FOR
LICENSURE AS GAMING VENDORS - PRIMARY

Dear Chairman Crosby and Commissioners:

Three companies in the Everi group of businesses have applied to the Massachusetts Gaming Commission for licensure as a Gaming Vendors – Primary: Everi Games Inc., Everi Payments Inc., and Central Credit LLC. The Investigations and Enforcement Bureau (“IEB”) has conducted a suitability background investigation of these Applicants in accordance with G.L. c. 23K, §§ 12, 16, 31, and 205 CMR 134.10. As an initial step in this process, the IEB, after a scoping process, designated two Everi-affiliated entities (in addition to the three Applicants) and 11 individuals as qualifiers for these three applications. See 205 CMR 134.134.04(4). The qualifiers are as follows:

Entity Qualifiers

1. Everi Holdings Inc. (the ultimate parent company for each of the three Applicants)
2. Everi Games Holdings Inc. (the immediate parent company for the Applicant Everi Games Inc.)

Individual Qualifiers

1. Michael Rumbolz, President, Chief Executive Officer & Director of Everi Holdings Inc.
2. Randy Taylor, Executive Vice President, Chief Financial Officer & Treasurer of Everi Holdings Inc.
3. Juliet Lim, General Counsel & Secretary of Everi Holdings Inc., and Executive Vice President of Everi Payments Inc.



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4. E. Miles Kilburn, Chairman, Board of Directors of Everi Holdings Inc.
5. Ronald V. Congemi, Member, Board of Directors of Everi Holdings Inc.
6. Geoffrey Judge, Member, Board of Directors of Everi Holdings Inc.
7. Edward Peters, Executive Vice President of Sales for Everi Holdings Inc.
8. Debra Massing, Senior Vice President of Sales for Everi Holdings Inc.
9. David Hartman, Vice President of Sales for Everi Holdings Inc.
10. Stephen Pugliese, Vice President of Sales for Everi Holdings Inc.
11. David Lucchese, Executive Vice President of Everi Games Inc.

We evaluated the three Applicants based upon the standards set forth in M.G.L. c. 23K, §§ 12, 16, and 31, and 205 CMR 134.10, which encompass an evaluation of the Applicants' overall reputation, including without limitation the following criteria:

- Integrity, honesty, good character and reputation;
- Financial stability, integrity and background;
- History of compliance with gaming licensing requirements in other jurisdictions;
- Whether the Applicant is a defendant in litigation at the time of application;
- Applicant's criminal history, if any;
- Whether the applicant submitted an application that intentionally contains false or misleading information;
- Whether the applicant committed prior acts that have not been prosecuted but form a pattern of misconduct;
- Whether and to what extent the Applicant has associations with members of organized crime or other persons of disreputable character;
- The Applicant's cooperation with the IEB in connection with the background investigation; and
- Integrity, honesty, and good character of any subcontractor.¹

Under Massachusetts law, an applicant for a Gaming Vendor – Primary license is required to establish its qualifications for licensure by clear and convincing evidence, including the statutory criteria of integrity, honesty, good character and reputation, and financial stability, integrity and background. Taking into consideration the entirety of the IEB's investigation, we recommend that the Commission approve Everi Games Inc., Everi Payments Inc., and Central Credit LLC for licensure. This letter summarizes the key aspects of the IEB's investigation.

In December of 2014, Global Cash Access Holdings Inc., a provider of payment processing systems in the gaming industry, acquired Multimedia Games, a slot developer and manufacturing company. The newly formed Everi group of companies resulted in Everi

¹ Of the three Applicants, only Everi Payments Inc. utilized subcontractor services in Massachusetts.



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Holdings Inc. (formerly Global Cash Access Holdings Inc.) becoming the ultimate parent holding company for Everi Games Inc. (formerly Multimedia Games Inc.), Everi Payments Inc. (formerly Global Cash Access Inc.) and Central Credit LLC. Everi Holdings Inc. is a publicly-traded company that is based in Las Vegas, Nevada and is traded on the New York stock exchange.

Everi Games Inc. designs, manufactures and supplies electronic gaming machines, systems, and technology to commercial and Native American casino operators, lottery operators and commercial bingo gaming facility operators in North American and international locations.

Everi Payments Inc. utilizes its patented ATM 3-1 integrated kiosk platforms as a service solution for gaming ticket redemption, bill breaking and cash access service to the casino floor. Everi Payments, Inc. is a wholly-owned subsidiary of Everi Holdings, Inc.

Central Credit LLC's primary function is as a repository for casino related credit data and reporting; since 1956, Central Credit, LLC has been assisting casino operators make real time decisions when extending credit to patrons including notification to casinos of any illegal, suspicious or derogatory activity such as patrons attempting to cash checks on closed accounts..

To date, Everi Games, Everi Payments, and Central Credit have conducted business in Massachusetts with the Plainridge Park Casino pursuant to temporary licenses that initially issued pursuant to 205 CMR 134.12 on March 19, 2015 (to Everi Games) and May 22, 2015 (to Everi Payments and Central Credit).

As part of our investigation, the IEB, among other things, reviewed the materials submitted as part of the applications; requested and reviewed supplemental information as deemed necessary; gathered information from a variety of governmental and non-governmental sources and databases; conducted criminal records checks; verified the accuracy of information provided as part of the applications; reviewed investigative files of gaming regulators from other jurisdictions relative to their background investigations of Everi Games Inc., Everi Payments Inc., Central Credit LLC and their affiliated and predecessor companies; communicated by telephone throughout the course of the investigation with Carmella Rocco, Manager of Corporate Compliance and Linda Soeder, Licensing Paralegal; conducted in-person and telephone interviews of qualifiers and other Everi employees; and conducted site visits to the home offices of all three Applicants in Las Vegas, Nevada. The Applicants were fully cooperative and forthcoming in all respects.

None of the Applicants has any criminal record. The investigation discovered no civil litigation that threatens the economic viability of the businesses or would negatively impact suitability. Research of available online and print media surfaced substantial media coverage of Everi, including media coverage of the 2014 acquisition, but no material that negatively impacts suitability.



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The IEB also evaluated the Applicants for financial suitability, integrity and background by performing financial analyses and verification of their financial information. To further assess financial stability, we evaluated the liquidity, solvency and profitability of the Applicants and parent companies for the two year post-acquisition period. Our financial evaluation did not raise any immediate concerns in terms of financial stability, and currently the financial conditions of the consolidated entities are stable. In sum, the financial review did not uncover any derogatory information that indicates that the Applicants lack the requisite financial stability, integrity and background to be licensed as Gaming Vendors – Primary.

The IEB also performed the requisite background suitability investigation of the 11 individuals who are qualifiers for the Applicants by virtue of their ability to exercise control or provide direction to the Applicants, and/or their responsibility for the Applicants' business in Massachusetts. See 205 CMR 134.04(4)(a), 134.04(5)(b). After performing all of the requisite inquiries and database checks on the individual qualifiers, no facts were discovered that would disqualify any of them. Nor did the investigation reveal any information that would preclude a finding that each of the individual qualifiers possesses the requisite integrity, honesty and good character to be deemed suitable under Massachusetts law.

In conclusion, taking into consideration the entirety of the investigation, the IEB recommends that the Commission approve the applications of Everi Games Inc., Everi Payments Inc., and Central Credit LLC for licensure as a Gaming Vendors – Primary.

Respectfully submitted,



Karen Wells
Director – IEB



Loretta M. Lillios
Chief Enforcement Counsel/Deputy Director, IEB

cc: Michael Rumbolz
Juliet Lim, Esq., General Counsel & Corp. Secretary, Everi Holdings, Inc.
Carmella Rocco, Manager of Corporate Compliance
Mass. State. Police Det. Lt. Brian Connors
Mass. State Police Trooper Dean Cerullo
Marlon Polite, Supervisor of Financial Investigations, MGC
Ferdinand Pellegrino, Financial Investigator, MGC



Massachusetts Gaming Commission

PART I ADMINISTRATION OF THE GOVERNMENT**TITLE II** EXECUTIVE AND ADMINISTRATIVE OFFICERS OF THE COMMONWEALTH**CHAPTER 23K** THE MASSACHUSETTS GAMING COMMISSION**Section 16** Grounds for denial of application for license or registration

Section 16. (a) The commission shall deny an application for a gaming license or a license for a key gaming employee issued under this chapter, if the applicant: (i) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; (ii) submitted an application for a license under this chapter that contains false or misleading information; (iii) committed prior acts which have not been prosecuted or in which the applicant was not convicted but form a pattern of misconduct that makes the applicant unsuitable for a license under this chapter; or (iv) has affiliates or close associates that would not qualify for a license or whose relationship with the applicant may pose an injurious threat to the interests of the commonwealth in awarding a gaming license to the applicant.

(b) The commission shall deny an application for a license or registration, other than a gaming license or a license for a key gaming employee, under this chapter if the applicant: (i) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that for convictions which occurred before the 10-year period immediately preceding application for licensure, an applicant may demonstrate, and the commission shall consider, the applicant's rehabilitation and whether such conviction should not be an automatic disqualification under this section; (ii) submitted an application for a license under this chapter that contains false or misleading information; (iii) committed prior acts which have not been prosecuted or in which the applicant was not convicted but form a pattern of misconduct that makes the applicant unsuitable for a license under this chapter; or (iv) has affiliates or close associates that would not qualify for a license or whose relationship with the applicant may pose an injurious threat to the interests of the commonwealth in awarding a gaming license to the applicant.

PART I ADMINISTRATION OF THE GOVERNMENT**TITLE II** EXECUTIVE AND ADMINISTRATIVE OFFICERS OF THE COMMONWEALTH**CHAPTER 23K** THE MASSACHUSETTS GAMING COMMISSION**Section 30** Licensing or registration of persons employed by a gaming licensee

Section 30. (a) No person shall be employed by a gaming licensee unless such person has been licensed by or registered with the commission.

(b) Any person seeking a key gaming employee license or a gaming employee license shall file an application with the bureau. Such application shall be on a form prescribed by the commission and shall include, but not be limited to, the following: (i) the name of the applicant; (ii) the address of the applicant; (iii) a detailed employment history of the applicant; (iv) fingerprints; (v) a criminal and arrest record; and (vi) any civil judgments obtained against the applicant pertaining to antitrust or security regulation. The bureau may require such other information as it considers appropriate including, but not limited to, information related to the financial integrity of the applicant, and may require the applicant to submit other documentation it considers appropriate including, but not limited to, bank accounts and records, bank references, business and personal income and disbursement schedules, tax returns and other reports filed by government agencies and business and personal accounting check records and ledgers.

(c) All other employees in a gaming establishment who are not considered to be gaming employees, key gaming employees or who have restricted access to an area of the gaming establishment or knowledge of security procedures, shall be required to register with the bureau as a gaming service employee and shall produce such information as the bureau may require to become registered under this chapter.

(d) Upon receipt of an application for a key gaming employee license and a gaming employee license the bureau shall conduct an investigation of each applicant which shall include obtaining criminal offender record information from the criminal history systems board and exchanging fingerprint data and criminal history with the department of state police and the United States Federal Bureau of Investigation.

(e) Upon petition by a gaming licensee, the commission may issue a temporary license to an applicant for a key gaming employee license or a gaming employee license if: (i) the applicant for a key gaming employee license or gaming employee license has filed a completed application with the commission; and (ii) the gaming licensee certifies, and the commission finds, that the issuance of a temporary license is necessary for the operation of the gaming

establishment and is not designed to circumvent the normal licensing procedures. Unless otherwise stated by the commission, a temporary license issued under this section shall expire 6 months from the date of its issuance and may be renewed, at the discretion of the commission, for an additional 6-month period.

(f) The commission may deny an application for a key gaming employee or gaming employee license or the registration of any other employee of a gaming establishment if the commission finds that an applicant or registrant is disqualified under section 16 or may be unsuitable for licensure under any of the criteria set forth in section 12; provided, however, that the commission, in its discretion, may issue a license to an applicant for a gaming employee license or register a gaming service employee who has a prior conviction if the applicant or registrant can affirmatively demonstrate the applicant's rehabilitation. In considering the rehabilitation of an applicant for a license under this section, the commission shall consider the following: (i) the nature and duties of the position of the applicant; (ii) the nature and seriousness of the offense or conduct; (iii) the circumstances under which the offense or conduct occurred; (iv) the date of the offense or conduct; (v) the age of the applicant when the offense or conduct was committed; (vi) whether the offense or conduct was an isolated or repeated incident; (vii) any social conditions which may have contributed to the offense or conduct; and (viii) any evidence of rehabilitation, including recommendations and references of persons supervising the applicant since the offense or conduct was committed.

(g) After completing an investigation of an applicant for a key gaming employee or gaming employee license the bureau shall approve or deny the license. Any orders by the bureau denying an application under this section shall be accompanied by an explanation of the reasons that an applicant did not meet the qualifications for licensure under this chapter. An applicant for a key gaming employee or gaming employee license may request a hearing before the bureau to contest the findings. After the hearing, the applicant may appeal the decision of the bureau to the commission and the commission may hear the appeal on the record. The decision of the commission shall be final and an applicant for a key gaming employee or gaming employee license shall not be entitled to further review.

(h) The commission may condition, suspend or revoke a license or registration under this section if the commission finds that a licensee or registrant has: (i) been arrested or convicted of a crime while employed by a gaming establishment and failed to report the charges or the conviction to the commission; (ii) failed to comply with the requirements of section 14; or (iii) failed to comply with any of the requirements of this chapter pertaining to licensees.

(i) The commission shall establish fees for a key gaming employee and a gaming employee license which shall include costs incurred for conducting a background investigation into an applicant for a license. The commission shall establish the term of a key gaming employee and a gaming employee license. It shall be the responsibility of the key gaming employee or gaming employee to ensure that the employee's license is current.

**PART I** ADMINISTRATION OF THE GOVERNMENT**TITLE II** EXECUTIVE AND ADMINISTRATIVE OFFICERS OF THE COMMONWEALTH**CHAPTER 23K** THE MASSACHUSETTS GAMING COMMISSION

Section 31 Licensing or registration of persons conducting a business with a gaming licensee, and vendors, suppliers and owners of common stock of companies required to be licensed as a gaming vendor

Section 31. (a) No person shall conduct a business with a gaming licensee unless such person has been licensed or registered with the commission.

(b) Any person seeking a gaming vendor license shall file an application with the bureau. Such application shall be on a form prescribed by the commission and shall include, but not be limited to, the following: (i) the name of the applicant; (ii) the post office address and, if a corporation, the name of the state under the laws of which it was incorporated, the location of its principal place of business and the names and addresses of its directors and stockholders; (iii) a criminal and arrest record; (iv) any civil judgments obtained against the person pertaining to antitrust or security regulation; (v) the identity of every person having a direct or indirect interest in the business and the nature of such interest; provided, however, that if the disclosed entity is a trust, the application shall disclose the names and addresses of all beneficiaries; provided further, that if the disclosed entity is a partnership, the application shall disclose the names and addresses of all partners, both general and limited; and provided further, that if the disclosed entity is a limited liability company, the application shall disclose the names and addresses of all members; (vi) an independent audit report of all financial activities and interests including, but not limited to, the disclosure of all contributions, donations, loans or any other financial transactions to or from a gaming entity or operator in the past 5 years; and (vii) clear and convincing evidence of financial stability including, but not limited to, bank references, business and personal income and disbursement schedules, tax returns and other reports filed by government agencies and business and personal accounting check records and ledgers. The commission may require such other information as it considers appropriate including, but not limited to, information related to the financial integrity of the applicant and may require the applicant to submit other documentation it considers appropriate including, but not limited to, bank accounts and records, bank references, business and personal income and disbursement schedules, tax returns and other reports filed by government agencies and business and personal accounting check records and ledgers.

(c) No person shall manufacture, sell, distribute, test or repair slot machines, other than antique slot machines as defined in section 5A of chapter 271, without a valid gaming vendor license issued by the commission.

(d) All other suppliers or vendors who are not considered to be gaming vendors including, but

not limited to, construction companies, vending machine providers, linen suppliers, garbage handlers, maintenance companies, limousine services, food purveyors or suppliers of alcoholic beverages, shall be considered non-gaming vendors and shall register with the commission and shall produce such information as the commission may require; provided, however, that the commission may require any vendor regularly conducting over \$250,000 of business with a gaming licensee within a 12-month period or \$100,000 of business within a 3-year period to be licensed as a gaming vendor.

(e) Any person owning more than 5 per cent of the common stock of a company required to be licensed as a gaming vendor, or a holding, intermediary or subsidiary company of such company, shall be required to file for licensure. The commission may waive the licensing requirements for institutional investors holding up to 15 per cent of the stock of the company, or holding, intermediary or subsidiary company of such company, upon a showing by the person seeking the waiver that the applicant purchased the securities for investment purposes only and does not have any intention to influence or affect the affairs or operations of the company or a holding, intermediary or subsidiary company of such company. Any institutional investor granted a waiver which subsequently determines to influence or affect the affairs or operations of the gaming vendor, or a holding, intermediary or subsidiary company of the gaming vendor, shall provide not less than 30 days notice to the commission of such intent and shall file an application and be subject to the licensing requirements of this chapter before taking any action that may influence or affect the affairs of the applicant company or a holding, intermediary or subsidiary company of the applicant company. Any company holding over 15 per cent of a gaming vendor, or a holding, intermediary or subsidiary company of a gaming vendor, shall be licensed under this chapter.

(f) If an applicant for a gaming vendor license or vendor or supplier registration is licensed or registered in another jurisdiction within the United States with comparable license and registration requirements and is in good standing in all jurisdictions in which it holds a license or registration, the commission may enter into a reciprocal agreement with the applicant to allow for an abbreviated licensing or registration process and issue a gaming vendor license or registration under this section; provided, however, that the commission shall reserve its rights to investigate the qualifications of an applicant at any time and may require the applicant to submit to a full application for a gaming vendor license or provide further information for registration.

(g) The bureau shall deny an application for a gaming vendor license or the registration of any other vendor or supplier if the bureau finds that the applicant or registrant is disqualified under section 16 or may be unsuitable for licensure under any of the criteria set forth in section 12.

(h) After completing an investigation of an applicant for a gaming vendor license, the bureau shall approve or deny the license. Any orders by the bureau denying an application under this section shall be accompanied with an explanation of the reasons that an applicant did not meet the qualifications for licensure under this section. An applicant for a gaming vendor license may

request a hearing before the bureau to contest the findings. After the hearing, the applicant may appeal the decision of the bureau to the commission and the commission may hear the appeal on the record. The decision of the commission shall be final and an applicant for a gaming vendor license shall not be entitled to further review.

(i) The commission shall be authorized to condition, suspend or revoke any license or registration under this section if the commission finds that a licensee or registrant has: (i) been arrested or convicted of a crime; (ii) failed to comply with section 13; or (iii) failed to comply with any provision of this chapter pertaining to licensees.

(j) The commission shall establish a master gaming or non-gaming vendor list to monitor all vendor contracts with a gaming establishment. Any gaming or non-gaming vendor doing business with a gaming establishment who has failed to submit an application for licensure or registration shall be prohibited from engaging in any future business with a gaming establishment; provided, however, that the commission may terminate any contract that has been entered into with an unlicensed or unregistered gaming or non-gaming vendor.

(k) Gaming licensees shall have a continuing duty to inform the commission of all vendor contracts.

(l) A license or registration issued under this section shall be issued for a term of 3 years. It shall be the responsibility of the gaming vendor or non-gaming vendor to ensure that the license is current.

(m) The commission shall establish fees for gaming vendor licenses and non-gaming vendor registrations which shall include costs incurred for conducting a background investigation into an applicant for the license.

(n) The commission shall monitor the conduct of all gaming vendors and other persons having a material involvement, directly or indirectly, with a gaming vendor to ensure that gaming vendor licenses are not issued to, or held by, and there is no direct or indirect material involvement with, a gaming vendor by unqualified, disqualified or unsuitable persons.

MEMORANDUM

To: Steve and Ed

From: Lloyd Macdonald

Date: September 21, 2016

Re: *Licensing and Registration Mandatory Disqualifications*

Steve asked me to look closely into the above issue because it may arise at the September 22nd public meeting of the Commission. He stated that he was particularly interested in my view as to whether there was a principled basis (my phrase) for concluding that the Commission had discretion to revise its current regulations— 205 CMR 134.11(2)(a) and 134.11(4)—which provide that an applicant for a gaming service employee registration is automatically disqualified if he/she, within the prior ten years, “has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury.”

I conclude that the issue is very nuanced on account of the history of the Commission’s promulgation of the regulations. As described below, I do believe there is a direct conflict between the automatic disqualification provision of Section 16(b) for gaming service and other employees and the provisions of Section 30(f) for gaming service employees and gaming employees. Under such circumstances, the Commission could be seen as having discretion to resolve the conflict by interpreting the competing statutory texts in a way most consistent (in the MGC’s judgment) with the underlying objectives of its founding statute, c. 23K.

However, here in September 2016, we are faced with the circumstance that in late 2013 the Commission was faced with the same issue and resolved it, after public hearings, by voting in January 2014 to promulgate regulations that, in effect, chose the automatic disqualification standard of Section 16(b) over the discretionary provision of Section 30(f). Further, the senior legal staff of the IEB continues to believe that the Commission’s 2014 decision is the most appropriate resolution of the competing statutory texts.

I summarize my thinking below on the strict legal issue but then add some further considerations as to why, independent of the legal merits, it may not be advisable or otherwise worth it to seek to amend the regulations.

The legal merits

The strongest argument in support of the Commission's discretion is the inconsistency between the categorical language of Section 16(b) of 23K and the discretionary provisions of Section 30(f) as excerpted below.

Broadly stated, the underlying legal principle that would endow the Commission with discretion under these circumstances is that where there is ambiguity in a statute, either on account of inconsistent language or because of a simple lack of clarity, an administrative agency with responsibility to enforce the statute may interpret the statute in such a way as to reconcile the provisions according to the underlying objectives of the statute. In such circumstances, if challenged, the administrative agency's interpretation is entitled to substantial (though not unlimited) deference by the courts.

The operative text of Section 16(b) is: "the commission shall deny an application for a license or registration...if the applicant: (i) has been convicted of a felony or other crime involving embezzlement, theft, fraud or perjury; provided, however, that for convictions which occurred before the 10-year period immediately preceding [the] application...the applicant may demonstrate, and the commission shall consider, the applicant's rehabilitation and whether such conviction should not be an automatic disqualification...."¹

The title of Section 16 is "Grounds for denial of application for license or registration."

The inconsistent provisions in 23K are the following:

First (and most plausibly) is the text of Section 30(f) with regard to gaming employees and gaming service employees to the effect that the Commission "may deny an application...for the registration of any other employee of a gaming establishment if the commission finds that an applicant or registrant is disqualified under section 16 or may be unsuitable for licensure under any of the criteria set forth in [S]ection 12; provided, however, that the commission, in its discretion, may issue a license to an

¹ Section 16(b) also provides that the commission "shall deny" an application for a license or registration in three other circumstances: "if the applicant: ... (ii) submitted an application for a license under this chapter that contains false or misleading information; (iii) committed prior acts which have not been prosecuted or in which the applicant was not convicted but form a pattern of misconduct that makes the applicant unsuitable for a license under this chapter; or (iv) has affiliates or close associates that would not qualify for a license or whose relationship with the applicant may pose an injurious threat to the interests of the commonwealth in awarding a gaming license to the applicant."

applicant for a gaming employee license or register a *gaming service employee* who has a prior conviction if the applicant or registrant can affirmatively demonstrate the applicant's rehabilitation."

The title of Section 30 is "Licensing or registration of person employed by a gaming licensee."

The second arguably inconsistent provision is the text of Section 12(7) of Chapter 23K, which references the circumstance of an "applicant [being] disqualified...under section 16 but with such disqualification being subject to "considering the rehabilitation of [the] applicant" upon the demonstration of such rehabilitation "by clear and convincing evidence".²

Try as I might to reconcile the texts of 16(b) with 30(f) as they apply to gaming service employees, I am unable to.

Accordingly, in my view we are confronted with two inconsistent provisions on a subject material to the larger objectives of the Gaming Statute. Those objectives prominently include, on the one hand, the assurance of the integrity and honesty of the gaming establishments and their employees and, on the other, the expansion of employment opportunities for minorities and other persons who historically have been underrepresented in the workforce.

With that being the situation, normally it would lie within the authority of the Commission to exercise its collective judgment and discretion to resolve the conflict by promulgating new regulations to do so.

Other considerations

Following our Wednesday meeting with Catherine last week, she provided me with a link to the Commission's December 13, 2013 public meeting where the proposed licensing and registration regulations were first formally discussed. I reviewed the transcript, and followed up further with Todd (who led the staff presentation at the December 13th hearing). Todd directed me, as well, to the transcript of the Commission's subsequent public meeting that was held on January 9, 2014, where the pertinent regulations (revised from the December 13th version), were further discussed and then formally adopted by unanimous vote of the Commission. (Todd led the staff presentation at that hearing, as well.) As is known, the formally promulgated regulation relating to gaming service employees (205 CMR 134.11(2) and (4)) provides for

² While Section 12(7)'s reference to rehabilitation further suggests 23K's receptiveness to the notion of an applicant being able to demonstrate that a problematic history does not necessarily foreclose eligibility, the thrust of 12(7) is directed toward gaming operator applicants. As such, it is not as directly pertinent as Section 30(f) to the issue at hand.

automatic disqualification if the applicant was convicted of a designated offense less than ten years prior to the application.

In deciding what's an appropriate course at this juncture, it is important to note that at the Commission's December 13th 2013 hearing the prospect of gaming service employees being automatically disqualified on account of convictions for felonies and the other offenses referenced in Sections 16(b) less than ten years before was addressed at length. For example, Todd advised the Commission (at page 65 of the transcript), "The key here is the automatic nature of certain convictions and the automatic disqualifying nature." On the following page, he noted, "[Y]ou can only demonstrate rehabilitation if the offense occurred more than 10 years ago.... It's an automatic disqualifier." And Todd concluded this portion of his presentation by saying, "So we [the staff] thought it was important that the commission understand what our interpretation of the law was and is...because it will have—perhaps broad implications."

Extensive discussion followed. For example, Guy Michael affirmed Todd's interpretation, saying, "[T]hat's the reading of the statute. It's—in certain instances it could be harsh. I mean...you have somebody who has a shoplifting nine years ago, that's a theft offense, they would be prohibited from being a slot mechanic. You know, that's a harsh result, but if that's the legislative intent, then there's really nothing else the commission can do." Steve then interjected, "And on that case and point, that is legislative intent?" Todd responded, "[T]hat's the way we read it."

Jill Griffin noted that there had been public comment as to "concerns about the CORI check, specifically for gaming service employees." And Steve then remarked, "[T]he issue of CORI for service workers is a really good example. You know, it may be, if that's one that the law imposes on us then we're stuck with that. But you may want to file this away, too. We will be talking some day with the legislature...and that might be one we may want to think about."

Jim McHugh then added, "Mr. Michael's point is exactly right. Shoplifting of any kind...would trigger the 10 year disqualification."

The Commission then heard from several representatives of community organizations. They reinforced the concern about the impact of the proposed regulations. Hakim Cunningham of the Boston Worker's Alliance stated, "[W]e have to start to think critically...about impediments to economic opportunity."

Steve responded, "I just want to make sure that we're doing what I think is a policy intention...to bridge from that to the reality of the real people that a person like Mr. Cunningham works with, and figuring out how to facilitate their chance to get these jobs." (He then addressed himself to Jill: "That's your job, Jill.")

The director of Local 26 service workers union then addressed the Commission at length and strongly reinforced the point: “Our concern...is that the registration and licensing process may prevent many people from accessing the casino jobs.”

It appears from the transcript of the December 13th meeting that it had been the intention of the Commission to vote that day on the proposed regulations. However, in light of the CORI discussion, the Commission decided to postpone a vote until further attention could be addressed to the issue.

The next public meeting of the Commission was held on January 9th. As noted earlier, Todd presented the staff’s position. No further testimony from community or other representatives was received; however, Todd reported that the regulations had been further revised to accommodate some of the concerns expressed in December. For example, he reported that juvenile delinquency convictions of the subject offenses would not count as automatic disqualifiers. Further, sealed records of adult convictions of the offenses would not count, either. And Todd noted, the subject “information will be considered in the light most favorable to the applicant unless it can’t be done so in accordance with the statute.” The Commission then voted to approve the regulations in their present form.

In addition to reviewing the transcripts and talking through the issues with Todd, I met at some length last Thursday with IEB staff who believe that the Commission got it right back in 2014 by resolving the subject discrepancy between Sections 16(b) and 30(f) in favor of 16(b)’s automatic disqualification. They believe it is more in keeping with the overall policy objectives of 23K while acknowledging the force of the statute’s countervailing workforce development policy interest.

At the meeting, they gave me a copy of the transcribed remarks at a 2015 GPAC meeting by Senator Ross, who apparently had participated in the 2011 23K conference committee deliberations. He observed, “I think we...figured there are enough really truly honest people out there that don’t have jobs that are going to be applying...that we’d really like those people to be given preference first. Ten years doesn’t seem like a long time to have to be clean and away from getting felony convictions.... Somewhere along the line, we’ve got to draw the line in the sand and keep the integrity of the operations the way you’d like to see them operating.”

IEB also suggested that the problem of the regulations having an adverse impact on employment opportunities on underemployed groups might not be as serious as some believe noting that of the 1,000 employees investigated for Plainridge only one was disqualified on account of 16(b). And that person was applying for a gaming employee position, not a service position. They acknowledged, however, that the

applicant pool for semi-rural Plainridge might have been very different from what the applicant pools will be in Springfield and Everett/Boston.

Finally, late on Friday I shared with IEB staff the results of my early exegesis of Sections 16(b) and 30(f) and my preliminary conclusion that the inconsistency between the sections was in fact much more stark than I had originally thought. In an email before I left for the weekend, I asked them whether “I had missed something”.

They generally acknowledged the tension (I had not missed anything, they said), but reaffirmed the bottom line that, in their professional judgment, the subject regulations’ current text most reasonably reconciles the competing statutory purposes by construing 30(f) as applying only to convictions that fall outside of those that 16(b) requires be automatic disqualifiers.

Conclusion. I believe that the texts of 16(b) and 30(f) are sufficiently at odds to have been a lawful basis for the Commission to have exercised its discretionary authority in 2013 and 2014 to reconcile them by concluding that the rehabilitation provision of 30(f) trumped 16(b)’s automatic disqualification for the subject convictions. However, taking into consideration the Commission’s informed decision in 2014 to interpret it otherwise and the strength of the IEB’s still-current belief that that was the correct call, in the absence of hard data from MGM and Wynn that the present regulations will materially prejudice their workforce development goals, in my view (albeit subject to further consideration), it is not worth making an issue out of it at this time beyond raising a concern that 16(b)’s impact be closely monitored and our being supportive of any remedial legislation that may be filed in the future.



Legal Division

Amended Small Business Impact Statement

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c.30A, §5 relative to the proposed amendments in 205 CMR 6.00: Pari-Mutuel Rules for Thoroughbred Racing, Harness Racing, and Greyhound Racing; for which a public hearing was held on July 14, 2016. These amendments were developed as part of the process of promulgating regulations governing racing in the Commonwealth. The amendment governs a new section, 6.46: Pentafecta Pools, and provides the requirements and the means of distributing winnings for this method of wagering. The amendment provides wager options for patrons which will generate betting interests. The amendment will also bring the Commission into compliance with pari-mutuel wagering model rules of the Association of Racing Commissioners International (ARCI-004-105-X). These regulations are largely governed by G.L. c. 128A § 9, 128C § 8.

In accordance with G.L. c.30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

As a general matter, no small businesses will be impacted by these regulations. Accordingly, there are no less stringent compliance or reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

There are no schedules or deadlines for compliance or reporting requirements for small businesses created by these regulations.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

There are no compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:

There are no performance standards for small businesses to replace design or operational standards required in the proposed regulations.



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5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

G.L. c. 128A and G.L. c. 128C were enacted to promote the horse racing industry in the Commonwealth. The proposed regulations, as part of the overall process, are likely to encourage new business.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

These regulations do not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Cecelia M. Porché
Paralegal
Legal Division

Dated: _____



Massachusetts Gaming Commission