



**MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #236**

February 22, 2018
1:00 PM

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



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA
February 22, 2018**

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, February 22, 2018
1:00 p.m.
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA**

PUBLIC MEETING - #236

1. Call to order
2. Approval of Minutes
 - a. January 31, 2018 – VOTE
 - b. February 7, 2018 – VOTE
3. Investigations and Enforcement Bureau – Loretta Lillios, Deputy Director/Chief Enforcement Counsel
 - a. MGM Qualifier Suitability – VOTE
 - b. Wynn Update
4. Licensing Division – Paul Connelly, Director
 - a. Service Employee Registration Discussion – VOTE
5. Legal Division – Catherine Blue, General Counsel
 - a. Amendments to 205 CMR 138.10 and Small Business Impact Statement – Jobs Compendium Submission – Begin emergency promulgation process – VOTE
 - b. Final version of amendments and Amended Small Business Impact Statements - Complete promulgation process – VOTES
 - c. 205 CMR 133.04 – Duration of Exclusion and Removal from the List
 - d. 205 CMR 138.07, 138.66, 151.01 – Floor Plans
 - e. 205 CMR 138.20 – Possession of Firearms
 - f. 205 CMR 138.28, 138.33, 138.68, 140.02 - Unsecured Funds and Gaming Day
 - g. 205 CMR 141.06 – Notice to the Commission of Changes



Massachusetts Gaming Commission

6. Commissioner's Updates

7. 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.

2/20/18
Date


Stephen P. Crosby, Chairman

Date Posted to Website: February 20, 2018 at 1:00 p.m.



Massachusetts Gaming Commission

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

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: January 31, 2018 – 2:00 p.m.

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

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

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

Call to Order

See transcript page 2

[2:00 p.m.](#) Chairman Crosby called to order the 234th Commission meeting.

Update to Commission on Recent Developments regarding Wynn Resorts and Next Steps in the Regulatory Review Process

See transcript pages 2 – 6

Chairman Crosby opened by stating that the purpose of the day's meeting was to undertake a process to determine significance of the allegations outlined in the recent Wall Street Journal article on the suitability status of Mr. Steve Wynn and his organization. He also stated that the Commission sought to assure the people of Massachusetts of its absolute commitment to the Massachusetts Casino Gambling law.

Chairman Crosby stated that any resulting decisions would be firmly grounded in facts established by the Commission's investigators combined with legal guidance from the gaming statute.

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Director Karen Wells – Investigations and Enforcement Bureau (IEB)
See transcript pages 6 - 11

2:03 p.m. Director Wells stated that the IEB immediately began a regulatory review upon learning of the matter, and that the investigation is ongoing.

Director Wells stated that she had spoken to investigators about the initial Wynn Resorts, LLC suitability investigation to determine whether or not evidence of the concerning conduct was identified back in 2013 or any time subsequent to that. It was confirmed that the allegations and the \$7.5 million settlement agreement referenced in the Wall Street Journal were not identified at the time, and notably were not disclosed.

The circumstances around the \$7.5 million settlement and the decision not to disclose it to the IEB investigators during the Commission's suitability investigation would remain a critical element of the IEB's review.

Director Wells stated that the IEB plan going forward was to continue on a regulatory review which would consist of four components:

1. Review of suitability of individual qualifiers;
2. A review of any corporate action or lack thereof contemporaneous with the alleged misconduct;
3. Monitoring and reporting back to the commission on the corporate response to the commission on the corporate response to the information; and
4. Review of how the current situation potentially impacts the financial stability of the company.

General Counsel Catherine Blue – Legal Division
See transcript pages 11 - 15

2:10 p.m. Counsel Blue stated that the Legal Division has reviewed Chapter 23K in Massachusetts General Laws as well as the Commission's regulations relating to the Commission's and the IEB's authority to conduct a regulatory review of the type described by IEB Director Wells.

Counsel Blue outlined relevant statutory authority and regulatory guidelines for the Commission regarding investigations and suitability evaluation. She also noted the regulation that places a continuing duty on gaming licensees and qualifiers to notify the Commission of matters that impact their suitability.

Counsel Blue specifically noted that notwithstanding the broad authority granted to the Commission in regulating gaming licensees and qualifiers, gaming licensees and qualifiers are entitled to due process. After the review is

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complete, the licensees and qualifiers are entitled to notice and a hearing before the Commission before any final action is taken by the Commission.

General Discussion

See transcript pages 15 - 35

[2:15 p.m.](#) Commissioner Cameron and Director Wells discussed the time that it would take to conduct this investigation.

There was discussion around other investigations surrounding this matter and questions about coordination with other regulators involved.

[2:20 p.m.](#) Chairman Crosby noted that Wynn Resorts LLC's response to the Commission's requests for production of documents, and cooperation with this investigation will be a measure of the company's suitability and principles.

Commissioner Cameron stressed the importance of giving the IEB time to complete their investigation which is ongoing.

Executive Director Bedrosian stated that he will provide the IEB, Legal Division, and the staff appropriate resources for this investigation.

[2:41 p.m.](#) *Having no further business, a motion to adjourn was made by Commissioner Macdonald. The motion was seconded by Commissioner Zuniga. The motion passed unanimously.*

List of Documents and Other Items Used

1. Notice of Meeting and Agenda, dated January 31, 2018

/s/ Catherine Blue
Assistant Secretary

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Massachusetts Gaming Commission Meeting Minutes

Date/Time: February 7, 2018 – 2:00 p.m.

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

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

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

Call to Order

See transcript page 2

[2:00 p.m.](#) Enrique Zuniga called to order the 235th Commission meeting. He stated that because of Chairman Crosby's remote participation, all votes would be done by roll call.

Approval of Minutes

See transcript pages 2 – 5

[2:04 p.m.](#) *Commissioner Macdonald moved to approve the minutes of the meeting of January 18th as they appeared in the packet, subject to any corrections, typographical errors, or other nonmaterial matters. Commissioner Cameron seconded the motion. Commissioner Zuniga commented that he wanted two statements that he made to be further clarified in the minutes. Commissioner Macdonald amended his motion to incorporate these changes. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed unanimously.*

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Quarterly Budget Update

See transcript pages 5 - 11

[2:05 p.m.](#) Derek Lennon presented the Second Quarterly Budget Update for the fiscal year of 2018.

As the Commission's Administration and Finance staff was still assessing its operational costs on licensees, Mr. Lennon recommended that the Commission not adjust the assessment on licensees until the close of the third or fourth quarter of FY '18. Mr. Lennon advised that the MGC Office of Administration and Finance had discussed this approach with the three licensees responsible for the assessment and they were in agreement that they were in favor of waiting until the close of the fourth quarter.

Agnes Beaulieu presented the Supplier Diversity Program, its benchmarks, and the Commission's total spending and encumbrances to date through the second quarter. Ms. Beaulieu stated that they were on target to reach their goal in contracting minority and women-owned businesses, and were also working with a disabled veterans-owned business to purchase office supplies when economically prudent to do so.

Administrative Update

See transcript pages 14 - 31

[2:10 p.m.](#) **MGM Opening Update.**
Executive Director Ed Bedrosian gave a synopsis of expectations and a predictive timeline of the progress of MGM construction and staffing. He also described all of the efforts underway, including promulgating new regulations, the formation of the Gaming Enforcement Unit, and implementation of the Responsible Gaming (Game Sense) program.

[2:20 p.m.](#) **Wynn Review Update.**
Executive Director Bedrosian commented on the IEB's investigation of Wynn Resorts LLC, acknowledging that Steve Wynn had resigned. He expressed that Mr. Wynn's resignation raised additional considerations for the Commission which included:

1. Steve Wynn's stock ownership;
2. Management and control influence; and
3. Brand and financial impact.

Executive Director Bedrosian affirmed that despite Mr. Wynn's resignation, the IEB's investigation would continue with the same approach as articulated by Director Karen Wells previously. The following four components of the IEB's review would continue to remain active:

1. Review of the suitability of individual qualifiers, including Steve Wynn and other qualifiers potentially involved with this matter;

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2. Review of any corporate action, or lack thereof, contemporaneous with the alleged misconduct;
3. Monitoring and reporting back to the Commission on the corporate response; and
4. Review of how the current situation potentially impacts the financial stability of the company.

Chairman Crosby stated that there would be no conflict with getting MGM opened quickly, expeditiously and with absolute integrity during this investigation.

Mitigation Fund Applications

See transcript pages 31 - 42

[2:35 p.m.](#) Ombudsman John Ziemba presented a brief review of the 2018 Community Mitigation Fund applications that were received by the February 1st deadline. Mr. Ziemba gave an overview of the process for reviewing all of the applications. He also stated that the applications would be posted on a specific part of the Commission's website for public review, and the public would be invited to comment on them. Comments would be considered by the review team and forwarded to the Commissioners for review.

Racing Division

See transcript pages 42 - 59

[2:45 p.m.](#) **Payments of Unclaimed Winnings from Suffolk Downs 2016 Outs to Individuals**

Dr. Alexandra Lightbown recommended that the Commission approve \$407.00 of unclaimed wagers be paid to the individuals listed in the memo in the Commission packet.

[2:46 p.m.](#) *Commissioner Cameron moved to approve the request of Sterling Suffolk Racecourse for tickets, payments from 2016, for a total of \$407.00 Commissioner Macdonald seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.*

Recovery of Unclaimed Winnings – Suffolk Downs 2016

Dr. Lightbown recommended that the Commission approve the recovery of \$217,714.67 in unclaimed tickets for 2016 from Suffolk Downs, per statutory requirement.

[2:28 p.m.](#) *Commissioner Cameron moved to approve the payment of \$217,714.67 from Sterling Suffolk Racecourse to the Commonwealth of Massachusetts for the 2016 unclaimed winnings. Commissioner Macdonald seconded the Motion. Roll call*

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vote – Commissioner Stebbins: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. Motion passed 5 – 0.

Recovery of Unclaimed Winnings – Wonderland 2016

Dr. Lightbown recommended that the Commission approve the recovery of \$20,514.54 in unclaimed tickets for 2016 from Wonderland, per statutory requirement.

[2:50 p.m.](#)

Commissioner Stebbins moved to approve the payment of \$20,514.54 from Wonderland Greyhound Park to the Commonwealth of Massachusetts for the 2016 unclaimed winnings. Commissioner Cameron seconded the Motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. Motion passed 5 – 0.

Recovery of Unclaimed Winnings – Plainridge 2016

Dr. Lightbown recommended that the Commission approve the recovery of \$174,558.68 in unclaimed tickets for 2016 from Plainridge Racecourse, per statutory requirement.

[2:51 p.m.](#)

Commissioner Macdonald moved to approve the payment of \$174,558.68 from the Plainridge Racecourse to the Commonwealth of Massachusetts for the 2016 unclaimed winnings. Commissioner Cameron seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. Motion passed 5 – 0.

Recovery of Unclaimed Winnings – Raynham 2016

Dr. Lightbown recommended that the Commission approve the recovery of \$168,414.50 in unclaimed tickets for 2016 from Raynham-Taunton Racecourse, per statutory requirement.

[2:52 p.m.](#)

Commissioner Cameron moved to approve the payment of \$168,414.50 from Raynham-Taunton Massasoit Greyhound Associations to the Commonwealth of Massachusetts for the 2016 unclaimed winnings. Commissioner Macdonald seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. Motion passed 5 – 0.

Suffolk Downs Promotional Fund Payment Request

Senior Financial Analyst Doug O'Donnell presented a request for reimbursement from the Suffolk Downs Promotional Trust Fund. The request was for the balance due on the project of \$185,219.60.

The statutory basis and purpose of this fund were discussed.

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[2:57 p.m.](#) *Commissioner Cameron moved to approve the request for reimbursement by Suffolk Downs Promotional Trust Fund in the amount of \$185,219.60, as outlined in the memo dated February 7th, 2018. Commissioner Macdonald seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. Motion passed 5 – 0.*

Local Aid Payments

Mr. O'Donnell presented a request for disbursement of \$245,768.79 for the quarterly local aid distribution. These are the monies that are submitted to the local towns where racing is taking place and simulcasting. Mr. O'Donnell reviewed a computation sheet with the Commissioners.

[3:00 p.m.](#) *Commissioner Stebbins moved that the Commission approve the local aid quarterly payment dated December 31, 2017 for \$245,768.79 with the distribution as outlined in the packet. Commissioner Cameron seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.*

Legal Division

See transcript pages 59 - 90

[3:00 p.m.](#) Amendments to 205 CMR 136, 138.2 and Small Business Impact Statement – Alcohol Beverage License

General Counsel Catherine Blue requested that the Commission approve the Small Business Impact Statement and amendments to the Alcohol Beverage License regulation and begin the promulgation process. The amendments implemented the statutory requirement that licensees may request the ability to serve alcohol on the gaming floor between the hours of 2 and 4 a.m.

There was discussion around the purpose of the proposed regulation being to conform to the law, and that a substantive review process would be implemented once an application is received.

[3:05 p.m.](#) *Commissioner Macdonald moved to approve the amendments to 205 CMR 136 and 138.12, as included in the packet and authorized the staff to take the steps necessary to file the regulation with the secretary of the Commonwealth, and to proceed with the regulation promulgation process. Further, he moved that the Commission approve, for filing, the associated Small Business Impact Statement as included in the packet. Commissioner Cameron seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.*

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Amendments to 205 CMR 140 and Small Business Impact Statement – Use of the Vigorish

Action was deferred on this item. The Legal Division stated that it would bring this back to the Commission when ready for review.

Small Business Impact Statement for 205 CMR 152 – Excluded Persons

General Counsel Blue requested that the Commission approve the Small Business Impact Statement for the amendments to the Excluded Persons List regulation. The amendments addressed the process by which an individual would be placed on the Excluded Persons List, and clarified protocol for enforcement. The Commission's previously requested changes to the regulation were made. This request was for approval of the accompanying Small Business Impact Statement only, enabling Legal Division to begin promulgation process.

[3:08 p.m.](#)

Commissioner Cameron moved that the Commission approve for filing, the Small Business Impact Statement as included in the packet, relative to the amendments to 205 CMR 152 involving individuals excluded from the gaming establishment that were previously approved for filing. Commissioner Macdonald seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.

Small Business Impact Statement for 205 CMR 134.03 – Service Employee Registration Exempt Positions

General Counsel Blue requested that the Commission approve the Small Business Impact Statement for the amendments to the Service Employee Registration Exempt Positions regulation. The amendment gave the Commission discretion to exempt certain gaming service employees from the registration requirement, as determined by its classification of job positions. The Commission's previously requested changes to the regulation were made. This request was for approval of the accompanying Small Business Impact Statement only, enabling Legal Division to begin an emergency promulgation process.

[3:10 p.m.](#)

Commissioner Macdonald moved to approve for filing the Small Business Impact Statement, as included in the packet, relative to the amendments to 205 CMR 134.03 involving the exemption of certain gaming service employees from the registration requirement that was previously approved for filing. Commissioner Cameron seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.

Final Version of Amendments and Amended Small Business Impact Statements for 205 CMR 138.28, 138.33, 138.68, and 140.02

Action was deferred on this item.

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Deputy General Counsel Todd Grossman presented a comment received by MGM regarding an issue with setting a uniform time frame for a Gaming Day for all licensees, as MGM already had a system with a different time frame than the one proposed in the regulation. Based on this comment and after some discussion, the Commission deferred action on this item until further analysis after feedback was received from other licensees and a cost assessment for MGM's compliance was conducted.

Final Version of the Amendments to 205 CMR 137.02 and Amended Small Business Impact Statement – Gaming Schools

General Counsel Blue requested that the Commission approve the Amended Small Business Impact Statement and final version of the amendments to the Gaming Schools regulation in order to move it through the final promulgation process. The amendment clarified that a student need only complete the mandated Responsible Gaming training class once, even if the student receives training on more than one game.

3:27 p.m. *Commissioner Macdonald moved to approve the Amended Small Business Impact Statement and final version of 205 CMR 137.02, as included in the packet, and authorize the staff to take all steps necessary and file the regulation with the secretary of the Commonwealth and complete the regulation promulgation process. Commissioner Stebbins seconded the motion. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed 5 – 0.*

3:28 p.m. *Having no further business, a motion to adjourn was made by Commissioner Cameron. The motion was seconded by Commissioner Stebbins. Roll call vote – Commissioner Stebbins: Aye. Commissioner Cameron: Aye. Commissioner Macdonald: Aye. Chairman Crosby: Aye. Commissioner Zuniga: Aye. The motion passed unanimously.*

List of Documents and Other Items Used

1. Notice of Meeting and Agenda, dated February 7, 2018
2. Massachusetts Gaming Commission Meeting Minutes draft, dated January 18, 2018
3. FY18 Second Budget Update Report
4. Appendix A of FY18 Actuals Spending and Revenue as of 1/1/2018
5. Appendix B – Budget Amendment Requests by Quarter
6. Appendix C – Expense Budget Form
7. FY18 Projections – 2nd Quarter Presentation
8. Memo on Applications Received
9. Suffolk Payments from Outs Book 2018 for 2016
10. Suffolk Unclaimed Tickets Recovery 2018 from 2016

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11. Wonderland Park Unclaimed Tickets Recovery 2018 from 2016
12. Plainridge Unclaimed Tickets Recovery 2018 from 2016
13. Raynham Unclaimed Tickets Recovery 2018 from 2016
14. Racing Suffolk Downs Promotional Fund Payment request
15. Racing Local Aid Payments
16. Amended Small Business Impact Statement 137.02 draft
17. Extended Alcohol Hours regulation draft
18. Amended Small Business Impact Statement 138-140 draft
19. Use of Vigorish 140.02 regulation draft
20. Small Business Impact Statement 134.03 draft
21. Excluded Persons List 152.00 regulation draft
22. Small Business Impact Statement 136.00, 138.00 draft
23. Service Employee Registration Exemptions 134.03 regulation draft
24. Small Business Impact Statement 140.02 draft
25. Gaming Day 138.00 regulation draft
26. Blue Tarp redevelopment Comments on Proposed Amendments to 138.28
27. Plainridge Park Casino Comments on Proposed Amendments to 138.28
28. Small Business Impact Statement 152.00 draft
29. Gaming School Curriculum 137.02 regulation draft

/s/ Catherine Blue
Assistant Secretary



To: Stephen Crosby, Chair
Gayle Cameron, Commissioner
Lloyd Macdonald, Commissioner
Bruce Stebbins, Commissioner
Enrique Zuniga, Commissioner

From: Loretta M. Lillios, Chief Enforcement Counsel - IEB

Date: February 21, 2018

Re: Wynn Resorts' Ltd. October 2014 Contribution to the Republican Governors' Association

cc: Edward Bedrosian, Executive Director – MGC
Karen Wells, Director, Investigations & Enforcement Bureau – MGC
Catherine Blue, General Counsel – MGC
Todd Grossman, Deputy General Counsel - MGC

This memorandum is submitted to the Commission to address questions that recently arose regarding a contribution made in October of 2014 by Wynn Resorts Ltd. to the Republican Governors' Association ("RGA") in the amount of \$2 million. The contribution was made two weeks after the Commission determined to issue the Region A Category One gaming license to Wynn MA, LLC. The contribution was a matter of public record, and the Investigations & Enforcement Bureau ("IEB") reviewed it at the time.

There are two relevant provisions of law potentially implicated by the contribution to the RGA. The first is G.L. c. 23K, § 46, a provision of the gaming law.¹ Section 46 applies to **applicants** for a gaming license and is enforced by the Gaming Commission. Once an "applicant" is awarded a gaming license, it becomes a gaming "licensee," and then G.L. c. 55, § 7A(c) of the Commonwealth's Campaign Finance Law applies.² Section 7A(c) is enforced by the Commonwealth's Office of Campaign and Political Finance ("OCPF").

¹ "No **applicant** for a gaming license, nor any holding, intermediary or subsidiary company thereof, nor any officer, director, key gaming employee or principal employee of an **applicant** for a gaming license or of any holding, intermediary or subsidiary company thereof nor any person or agent on behalf of any such **applicant**, company or person, shall directly or indirectly, pay or contribute any money or thing of value to: (i) an individual who holds a municipal, county or state office; (ii) any candidate for nomination or election to any public office in the commonwealth, including a municipal office; or (iii) any group, political party, committee or association organized in support of any such candidate or political party; provided, however, that the provisions of this section shall not prohibit an individual who is a candidate for public office from contributing to the candidate's own campaign." G.L. c. 23K, § 46 (emphasis added).

² "The aggregate of all contributions by a person who holds a license issued by the Massachusetts gaming commission, who was required to apply for that license under section 14 of chapter 23K, for the benefit of any 1 candidate and such candidate's committee shall not exceed \$200 in a calendar year. The aggregate of all



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Section 7A(c) prohibits gaming licensees from making political contributions in excess of certain amounts to "any 1 candidate and such candidate's committee," or to "any other political committee" that is subject to Massachusetts law. Although § 7A(c) is enforced by the OCPF, the Commission nevertheless considers a gaming licensee's compliance with *all* the Commonwealth's laws as relevant to the licensee's ongoing suitability status.

With respect to G.L. c. 23K, § 46, Wynn Resorts' contribution was made after the Commission determined to award the Category One gaming license to Wynn MA, LLC.³ Thus, Wynn was a *licensee*, and not an *applicant*, at the time of the contribution. Accordingly, the contribution did not contravene § 46.

Turning to G.L. c. 55, § 7A(c), the contribution in question was made to the RGA, which is not a state political committee subject to Massachusetts law. Consequently, the IEB concluded that the contribution did not contravene § 7A(c).⁴

Transparency in political contributions is an important matter. The IEB was in contact with the OCPF as part of its initial inquiry into this contribution, and we will continue to work cooperatively with that office to enforce the current provisions of law. It goes without saying that if additional relevant details surface, the IEB will review them in a prompt and thorough manner.

contributions by a person who holds a license issued by the Massachusetts gaming commission, who was required to apply for that license under said section 14 of said chapter 23K, for the benefit of any other political committee, other than a ballot question committee, shall not exceed \$200 in a calendar year." G.L. c. 55, § 7A(c).

³ The Commission's determination to award the Region A gaming license to Wynn MA, LLC was made on September 17, 2014.

⁴ It should also be noted that the OCPF, which enforces G.L. c. 55, § 7A(c), initiated no action against Wynn Resorts Ltd. for the contribution.



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TO: Chairman Crosby, Commissioner Cameron, Commissioner Zuniga,
Commissioner Stebbins, Commissioner Macdonald

FROM: Paul Connelly, Director of Licensing

DATE: February 16, 2018

RE: Gaming Service Employee (SER) Exemptions

On November 2, 2017 Governor Baker signed a statutory amendment to the Gaming Act which granted the Massachusetts Gaming Commission the authority to exempt certain “Gaming Service Employee” level job positions from the mandatory registration process. At its January 18, 2018 meeting, the Massachusetts Gaming Commission discussed its policy perspective on this exemption authority and provided staff with a framework and process for considering any exemptions. The Commission directed staff to gather information from Licensees (MGM Springfield, as a start) regarding SER job duties and to deliver recommendations to the Commission about potential exemptions.¹

The Commission provided input regarding exemption parameters, and staff worked closely with MGM to identify positions that might meet those parameters. MGM was provided with a form to provide additional information about each identified position to support recommendations from MGC staff. (These are included in the packet.) This form reflected the Commission’s factors for consideration, including requesting descriptions or explanations about how each of the following conditions relates to each position:

- Work performed on the gaming floor
- Managerial responsibilities in any department
- Supervisory responsibilities in Human Resources, Sales and Marketing
- Responsibilities for alcohol sales, distribution, service, and/or storage
- Access to secure casino back-of-the house areas (including executive offices) without security escort
- Responsibilities for accounting and/or finance relating to the gaming establishment
- “Write” access to gaming-related casino databases

¹ Since MGM Springfield was instrumental in advocating for the exemption authority, and seeing that exemptions would have significant operational impact on the planning for opening in September of 2018, the exemption exercise was focused on MGM Springfield positions.



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- Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information

After significant, collaborative work with MGM, we are recommending that the Commission consider exemption for the positions in the “Exempt Position List” that follows on the next page. The recommendations include 127 jobs encompassing 870 employees.

It is important to note that these exemptions may be revisited by the Commission at any time, and additional positions may be exempted in the future.



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OVERVIEW

Remaining Service Employee Positions		
Total # SER Positions	Unique SER Job Profiles	Total SER Headcount
151	109	625

Exempted Positions (Recommended)		
Total # of Positions	Unique Job Profile #s	Total Exempt Headcount
127	68	870

EXEMPT POSITION LIST (RECOMMENDED)

Job Profile Number	Department	Property Access Level	MGC Licensing Category	Position
16154	Guest Experience	N	Exempt	Guest Experience Specialist
14611	Front Desk	N	Exempt	Front Desk Representative
15139	Front Desk	N	Exempt	Room Coordinator
17118	Front Door Services (Bell)	N	Exempt	Front Services Supervisor
14826	Front Door Services (Bell)	N	Exempt	Front Services Attendant
16851	Housekeeping	N	Exempt	Housekeeping Floor Supervisor
14628	Housekeeping	N	Exempt	Guest Room Attendant
14629	Housekeeping	N	Exempt	Houseperson - Housekeeping
15141	Sales	N	Exempt	Hotel Sales Coordinator
15076	Sales	N	Exempt	Convention Services Coordinator
10236	Guest Services	N	Exempt	Guest Services Representative
14084	F&B Administration	N	Exempt	Executive Chef
10371	F&B Administration	N	Exempt	Executive Sous Chef
10946	F&B Administration	N	Exempt	Director Restaurants
15767	F&B Administration	N	Exempt	Manager Training & Development F&B
10684	F&B Administration	N	Exempt	Manager F&B Project Administration
10007	F&B Administration	N	Exempt	Admin Assistant - F&B
12205	Stewarding	N	Exempt	Assistant Executive Steward
15647	Stewarding	N	Exempt	Kitchen Steward
16574	Convention	N	Exempt	Banquet Manager

Job Profile Number	Department	Property Access Level	MGC Licensing Category	Position
16225	Convention	N	Exempt	Banquet Supervisor
14873	Convention	N	Exempt	Banquet Server
16872	Convention	N	Exempt	Convention Service Housemen
14546	Convention	N	Exempt	Banquet Chef
10168	Convention	N	Exempt	Banquet Sous Chef
14622	Convention	N	Exempt	Banquet Cook
15647	Convention	N	Exempt	Kitchen Steward
17195	Convention	N	Exempt	Utility Porter
10368	Main Kitchen	N	Exempt	Executive Chef - Main Kitchen
14958	Main Kitchen	N	Exempt	Pastry Chef - Main Kitchen
14729	Main Kitchen	N	Exempt	Executive Sous Chef - Main Kitchen
10352	Main Kitchen	N	Exempt	Sous Chef - Main Kitchen
14871	Main Kitchen	N	Exempt	Baker - Main Kitchen
14622	Main Kitchen	N	Exempt	Cook - Main Kitchen
15647	Main Kitchen	N	Exempt	Kitchen Steward - Main Kitchen
14605	Main Kitchen	N	Exempt	Runner - Main Kitchen
17195	Main Kitchen	N	Exempt	Utility Porter - Main Kitchen
10352	Garde Manger	N	Exempt	Sous Chef - Garde Manger
14622	Garde Manger	N	Exempt	Cook - Garde Manger
15647	Garde Manger	N	Exempt	Kitchen Steward - Garde Manger
14622	Extraboard-Relief	N	Exempt	Extraboard - Relief Cook
15470	EDR	N	Exempt	Executive Chef - EDR
10352	EDR	N	Exempt	Sous Chef - EDR
14622	EDR	N	Exempt	Cook - EDR
14619	EDR	N	Exempt	Busser - EDR
15647	EDR	N	Exempt	Kitchen Steward - EDR
16703	The Chandler Steakhouse	N	Exempt	Assistant Manager / Sommelier - Chandler Steakhouse
15590	The Chandler Steakhouse	N	Exempt	Server - Chandler Steakhouse
15632	The Chandler Steakhouse	N	Exempt	Host - Chandler Steakhouse
14619	The Chandler Steakhouse	N	Exempt	Busser - Chandler Steakhouse
14605	The Chandler Steakhouse	N	Exempt	Runner - Chandler Steakhouse
11062	The Chandler Steakhouse	N	Exempt	Outlet Chef - Chandler Steakhouse

Job Profile Number	Department	Property Access Level	MGC Licensing Category	Position
14729	The Chandler Steakhouse	N	Exempt	Executive Sous Chef - Chandler Steakhouse
10352	The Chandler Steakhouse	N	Exempt	Sous Chef - Chandler Steakhouse
14622	The Chandler Steakhouse	N	Exempt	Cook - Chandler Steakhouse
14871	The Chandler Steakhouse	N	Exempt	Pastry Cook - Chandler Steakhouse
14624	The Chandler Steakhouse	N	Exempt	Pantry Worker - Chandler Steakhouse
15647	The Chandler Steakhouse	N	Exempt	Kitchen Steward - Chandler Steakhouse
17195	The Chandler Steakhouse	N	Exempt	Utility Porter - Chandler Steakhouse
17195	The Chandler Steakhouse	N	Exempt	Pot Cleaner - Chandler Steakhouse
16703	Cal Mare	N	Exempt	Assistant Manager / Sommelier - Cal Mare
15590	Cal Mare	N	Exempt	Server - Cal Mare
16722	Cal Mare	N	Exempt	Fountain Worker - Cal Mare
15632	Cal Mare	N	Exempt	Host - Cal Mare
14619	Cal Mare	N	Exempt	Busser - Cal Mare
14605	Cal Mare	N	Exempt	Runner - Cal Mare
11062	Cal Mare	N	Exempt	Outlet Chef - Cal Mare
14729	Cal Mare	N	Exempt	Executive Sous Chef - Cal Mare
10352	Cal Mare	N	Exempt	Sous Chef - Cal Mare
14622	Cal Mare	N	Exempt	Cook - Cal Mare
14624	Cal Mare	N	Exempt	Pantry Worker - Cal Mare
15647	Cal Mare	N	Exempt	Kitchen Steward - Cal Mare
17195	Cal Mare	N	Exempt	Utility Porter - Cal Mare
14605	Cal Mare	N	Exempt	Runner - Cal Mare
17195	Cal Mare	N	Exempt	Pot Cleaner - Cal Mare
11417	Starbucks	N	Exempt	Assistant Manager - Starbucks
15592	Starbucks	N	Exempt	Lead Fountain Worker - Starbucks
16722	Starbucks	N	Exempt	Fountain Worker - Starbucks
15647	Starbucks	N	Exempt	Kitchen Steward - Starbucks
16722	South End Market	N	Exempt	Fountain Worker - South End Market
14892	South End Market	N	Exempt	Runner/Busser - South End Market
10368	South End Market	N	Exempt	Outlet Chef - South End Market
14729	South End Market	N	Exempt	Executive Sous Chef - South End Market
10352	South End Market	N	Exempt	Sous Chef - South End Market
14622	South End Market	N	Exempt	Cook - South End Market

Job Profile Number	Department	Property Access Level	MGC Licensing Category	Position
15647	South End Market	N	Exempt	Kitchen Steward - South End Market
17195	South End Market	N	Exempt	Utility Porter - South End Market
17195	South End Market	N	Exempt	Pot Cleaner - South End Market
15590	TAP	N	Exempt	Server - TAP
15632	TAP	N	Exempt	Host - TAP
14619	TAP	N	Exempt	Busser - TAP
14605	TAP	N	Exempt	Runner - TAP
10368	TAP	N	Exempt	Outlet Chef - TAP
14729	TAP	N	Exempt	Executive Sous Chef - TAP
10352	TAP	N	Exempt	Sous Chef - TAP
14622	TAP	N	Exempt	Cook - TAP
15647	TAP	N	Exempt	Kitchen Steward - TAP
17195	TAP	N	Exempt	Utility Porter - TAP
17195	TAP	N	Exempt	Pot Cleaner - TAP
14879	Casino Svc Bar	N	Exempt	Bar Porter - Casino Service Bar
14879	Walk-Up Casino Bar	N	Exempt	Bar Porter - Walk-Up Casino Bar
14879	Commonwealth	N	Exempt	Bar Porter - Commonwealth
14879	Knox Bar	N	Exempt	Bar Porter - Knox Bar
10851	Spa	N	Exempt	Manicurist
10847	Spa	N	Exempt	Hair Stylist
16608	Spa	N	Exempt	Esthetician
10170	Spa	N	Exempt	Attendant - Spa/Salon
11925	Spa	N	Exempt	Receptionist - Spa
14626	Valet	N	Exempt	Valet Attendant
10556	Valet	N	Exempt	Coat Check Attendant
15007	Valet	N	Exempt	Cashier - Valet
10007	General & Executive	N	Exempt	Receptionist
16138	WFM	N	Exempt	Specialist Workforce Management
14592	WFM	N	Exempt	Admin Clerk Workforce Management
14561	Warehouse	N	Exempt	Lead Warehouse Attendant
14576	Warehouse	N	Exempt	Attendant Warehouse/Receiving
10450	Inventory Control	N	Exempt	Inventory Control Clerk
10007	EVS	N	Exempt	Admin Assistant

Job Profile Number	Department	Property Access Level	MGC Licensing Category	Position
16472	EVS	N	Exempt	Utility Porter
10746	Marketing Advertising	N	Exempt	Specialist Social/Digital
10606	Communications	N	Exempt	Communications Specialist
17120	Graphic Arts	N	Exempt	Graphics Supervisor
10735	Graphic Arts	N	Exempt	Graphics Designer
10566	Graphic Arts	N	Exempt	Graphic Arts Coordinator
14572 14573	Maintenance Operations	N	Exempt	Painters/ Carpenters
14639	Maintenance Operations	N	Exempt	Laborer



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Admin Assistant EVS | 10007

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017 <i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i>
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POSITION SUMMARY:

It is the primary responsibility of the Administrative Assistant to provide administrative support for the Environmental Services (EVS) office, including organizing and maintaining department files, and providing information to callers. All duties are to be performed in accordance with the department and property policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Answers telephones and gives information to callers, take messages, or transfers calls to proper individuals
- Greets visitors or callers, and handles their inquiries or directs to them to the appropriate persons according to their needs
- Arranges and coordinates all executive reservations and ensures proper amenities are prepared before arrival
- Creates and maintains paper and electronic files, databases and documents
- Researches and prepares daily casino news clips for distribution to executives using a variety of research methods
- Performs routine administrative tasks; distributes customer letters/feedback to appropriate departments and logs all complaints for executive review; receives and distributes department mail; orders and stocks all office supplies
- Assists Assistant to the President or Executive Assistants with special projects as needed
- Prepares and audits designated Directors expense reports for credit card usage against receipts and invoices for accuracy

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Admin Assistant EVS | 10007

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Admin Assistant EVS | 10007

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/15/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Admin Asst. F&B | 10007

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017
<i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i>	
<u>POSITION SUMMARY:</u>	
It is the primary responsibility of the F & B Administrative Assistant to assist Executive Assistant of Food & Beverage and other Food and Beverage Management with administrative responsibilities. All duties are to be performed in accordance with departmental and property policies, procedures, and practices.	
<u>POSITION RESPONSIBILITIES/DUTIES:</u>	
<ul style="list-style-type: none">• Provide support to the F & B executive team and division operations.• Answer phones, assist callers whenever possible, direct calls to appropriate areas or take messages.• Handle internal and external correspondence for executives and management staff, including maintenance and distribution of customer reply letters• Sort and distribute mail to Food and Beverage staff.• Direct guest complaints and issues as they relate to the Food & Beverage department to the appropriate staff for assistance.• Maintain office supplies and order as needed.• Assist in completing and handling proper distribution of company paperwork.• Perform special projects generated by other F&B departments.• Assist with the coordination of large parties when necessary.	

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Admin Asst. F&B | 10007

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry level position within property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Admin Asst. F&B | 10007

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

02/09/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Admin Clerk | 14592

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017
<p>The Workforce Management Coordinator is responsible for data entry in to several different systems used by the Workforce Management team. Also, generating, auditing and distributing time and labor reports. All duties are to be performed in accordance with department and property policies, practices, and procedures.</p>	<p><i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i></p>
<p><u>POSITION RESPONSIBILITIES/DUTIES:</u></p>	
<ul style="list-style-type: none">• Run and prepare labor and payroll reports for inter- or intra-departmental distribution and metrics tracking• Act as a liaison with various departments and provide administrative support in regards to time management and attendance, including daily callout volumes and tracking attendance reports• Review DAR to update Virtual Roster as needed• Coordinate and oversee a specific function or activity within a given operational area.• Work with multiple operational areas outside of the immediate functional area to complete assignments.• Other job related duties as requested.	

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Admin Clerk | 14592

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Office Clerical Duties; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Admin Clerk | 14592

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Administrative Assistant / Receptionist | 10007

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 2-9-2018

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

It is the primary function of the Administrative Assistant to perform a variety of administrative tasks that directly support the assistants and additional staff. All duties are to be performed in accordance with departmental and MGM Resorts International policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Answer multiline telephone in a consistently professional and courteous manner. Screen incoming calls and either assist callers when appropriate, forward calls, which can be handled by others, ascertain the nature of calls, and take messages.
- Take initiative to professionally and proactively greet and welcome people and callers and help resolve problems and provide information requested in a service-oriented capacity, always ensuring the best customer service.
- Sign for and route all incoming deliveries, packages, etc. Route all incoming executive mail to the Executive Assistants.
- Maintain scheduling for all conference rooms and kitchen by ensuring all areas are clean and presentable when not in use.
- “Open” the office in the morning by preparing conference room calendars, stocking all paper trays, stocking refrigerators with waters and sodas, and making sure all three conference rooms are clean and ready. Refresh coffee/kitchen supplies as needed throughout the day.
- Stock the office supply closet when supplies are delivered and for delivering specific orders to the executive assistants.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Administrative Assistant / Receptionist | 10007

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor and gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Administrative Assistant / Receptionist | 10007

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/15/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Aesthetician | 16608

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-20-2018

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Aesthetician to perform various skin care protocols while providing prompt, expert, and courteous service to all guests. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Performs various skin care protocols, including waxing, body treatments, and Microdermabrasion where applicable while upholding all state board standards.
- Performs all services within scope of license and in accordance with hotel policies.
- Follows recipe charts and maintains proper portions for each service.
- Escorts guests to various treatment rooms.
- Maintains equipment in facial room and reports equipment that is broken, damaged, unsafe, or in need of immediate repair to Spa Management.
- Recommends retail products and maintains awareness of new products and procedures.
- Keeps various facial room areas and supplies clean and stocked.
- Routinely checks product inventory and places orders with Spa Management.
- Attends mandatory training for all Aesthetician protocols.
- Responds effectively to guest inquiries related to the property and the local area while providing excellent service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Promotes and maintains the highest level of service to all guests, including smiling, greeting, and making eye contact, while staying alert to their needs.
- Resolves guest complaints within scope of authority; otherwise refers the matter to management. Notifies supervisor of all unusual events, circumstances, missing items, or alleged theft.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Aesthetician | 16608

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	None
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No work performed on gaming floor or surrounding areas

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Aesthethician | 16608

The undersigned states that the information herein is true and accurate.

Marikate Murren
Signature

Marikate Murren
/ Printed Name

2/8/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Assistant Executive Steward | 12205

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Assistant Executive Steward to assist in supervising the stewarding department. All duties are to be performed in accordance with departmental and company policies, practices, and procedures.

Essential Functions and Tasks

- Assist in overseeing operations in the stewarding department to ensure departmental strategic goals and intent are being met and exceeding expectations.
- Manage Human Resources responsibilities to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring, training and succession planning processes that encompass the company's diversity commitment; compliance with company and department policies, and legal requirements.
- Assist in handling all stewarding related labor relations issues. Assists in the investigation of such issues. Provide recommendations and issues appropriate counseling, suspensions, and terminations.
- Oversee on the job training & development programs through stewarding managers on a regular basis.
- Implement of F&B policies, operating procedures and training programs, manuals, directives, work schedules, rules and regulations for the stewarding staff and personnel.
- Coordinate purchase needs and parts to properly operate Food & Beverage outlet needs and fill outlet requisitions.
- Ensure all employees are properly trained in the Stewarding policies and procedures and use of all equipment.
- Act as a liaison with contract companies.
- Coordinate and communicate with all outside vendors and services, and Health Department.
- Other job related duties as requested

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Assistant Executive Steward | 12205

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Kitchen Workers F & B outlets • Kitchen Workers Relief • Utility Porters F & B outlets
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Stewarding Management; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Assistant Executive Steward | 12205

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Assistant Manager | 11417

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The primary responsibility of the Assistant Manager - Restaurant is to assist with managing the restaurant's operation during shift, supervises service staff, conducts necessary training and provides the best service to the guests and patrons. All duties are to be performed in accordance with departmental and property policies, practices and procedures.

Essential Functions and Tasks

- Assist in overseeing and supervising team members and operations during daily service ensure overall guest experience meets and exceeds expectations
- Support the management team with Human Resources responsibilities, including: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring recommendations, suggestions for training and succession planning processes that encompass the company's diversity commitment; adherence to the company's status quo third party representation philosophy; compliance with company policies, legal requirements and collective bargaining agreements
- Constantly monitor service levels on the dining room floor and adjust staffing as needed.
- Maintain Food Line Check to constantly ensure all ticket times meet property established standards.
- Ensure guest satisfaction by approaching every table and making sure the guest's dining expectations have been achieved.
- Order products and supplies for the restaurant.
- Conduct daily shift meetings and regular staff training meetings, as needed
- Train all employees on steps of service, sequence of service and hold them accountable to the standards.
- Ensure daily operational tasks are performed and completed.
- Ensure equipment is in proper working order.
- Ensure all areas of the restaurant are constantly maintained for cleanliness.
- Practice all necessary sanitation methods to ensure food safety standards are followed.
- Ensure necessary tools are provided to staff

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Assistant Manager | 11417

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Hostperson • Server • Bartender • Apprentice Bartender • Cocktail Server
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Culinary Managerial Tasks; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Assistant Manager | 11417

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Asst Mgr Restaurant Sommelier | 16703

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2018

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The Sommelier is to interact with guests and share his/her extensive knowledge of wines and their suitability with various dishes offered in the restaurant.

Essential Functions and Tasks

- Oversee service of wine/beverage during meal service in assigned outlet - includes taste-testing/sampling, selling, and pour/refill glasses, as needed
- Interact with guests during meal service - providing guidance with wine/beverage selection, upselling product, and gauging guest satisfaction and product/service quality
- Resolve escalated guest issues; includes approving system voids issuing comps, and making on-the-spot decisions regarding food/beverage items that don't meet guest satisfaction or established quality
- Support beverage operations with special requests/products during special events/occasions and VIP gatherings, includes but not limited to preparing wine/beverage selections/menu, preparing/setting up beverage offerings, greeting, interacting with, and serving guests
- Act as MOD in accordance with Mgmt Team Schedule; includes executing opening, pre- and post-service, and closing operation and staff management tasks
- Ensure wine, champagne, high-end beer/liquor inventory remain at/meet pre-established par levels; utilize purchasing/inventory system to submit orders/requisitions
- Maintain wine/beverage selections in cellar and calibrate system reporting, including removing and adding inventory/products as needed
- Work with property wine manager and/or restaurant GM to select and prepare wine/beverage selection for VIP guests or special events
- Facilitate scheduled and impromptu wine/beverage training and informational updates for current and new employees, as needed
- Ensure employees follow established policies, procedures, and expectations; Coach and discipline, as needed
- Interview and make hiring recommendations for line-level team members
- Other job related duties as requested

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Asst Mgr Restaurant Sommelier | 16703

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	None
Managerial responsibilities in any department	Sommelier
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Alcohol service - Presentation, Suggestion, Selling, Servicing of alcohol
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Asst Mgr Restaurant Sommelier | 16703

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Attendant Warehouse/Receiving | 14576

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-7-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Attendant Warehouse/Receiving to perform a variety of tasks related to the successful operation of the warehouse, including accurately receiving, performing the put-away function, and picking merchandise for outlet delivery. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Receives all merchandise, including verifying merchandise against receiving documents, performing counts, and inspecting for damage.
- Prepares orders for delivery to outlets, including palletizing and shrink wrapping totes/boxes and loading orders onto trucks.
- Performs the put-away function using the fork lift, electric pallet jack, and/or manual pallet jack.
- Picks and packages the outlet orders while using the electric order pickers.
- Detail counts all incoming merchandise and verifies to the packing list, merchandise order, or receiving document.
- Verifies accuracy of merchandise (e.g., description).
- Receives and unpacks merchandise.
- Records data (i.e. shipment information, delivery records, maintenance logs).
- Transports merchandise where applicable.
- Loads and unloads delivery trucks.
- Prepares the warehouse for inventory taking.
- Completes necessary paperwork and maintains area files.
- Maintains clean and orderly work areas.
- Ensures all equipment is in working order.
- Ensures applicable security measures are maintained.
- Interacts with management to ensure that all related goals of the department are achieved.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Attendant Warehouse/Receiving | 14576

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No worked performed on the gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Merchandise, Supply Handling only

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Attendant Warehouse/Receiving | 14576

The undersigned states that the information herein is true and accurate.

Marikate Murren
Signature

/ Marikate Murren
/ Printed Name

2/8/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Baker | 14871

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Baker to prepare, bake, decorate, finish, and issue various types of pastries, breads and cakes, and to assure preparation and service is of the highest possible quality and completed in a timely manner. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures, including health sanitation and safety policies.

Essential Functions and Tasks

- Maintains and strictly abides by sanitation/health regulations and hotel requirements.
 - Communicates effectively with management and co-workers with regards to the operations of the kitchen.
 - Follows recipes precisely, including conversion capabilities, and understands *mis en place*.
 - Prepares all baked goods (e.g., proofing, baking, and finishing).
 - Applies basic knife skills required for preparation.
 - Assists in decorating of cakes and pastries.
 - Conducts daily inventory according to par levels to determine what is needed for production.
 - Regularly runs for food and restocks all kitchen supplies and food items required for service.
 - Ensures all requisitions are processed properly and placed in designated area.
 - Identifies and safely uses all kitchen equipment.
 - Properly labels and dates all products to ensure safekeeping and sanitation.
 - Utilizes proper food handling techniques following health and safety standards.
 - Maintains a clean and organized work area.
- Assists Chefs and co-workers as needed in execution of preparation and production.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Baker | 14871

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or on gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Specialty Cook for resort; no gaming access

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Baker | 14871

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/8/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Chef | 14546

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2018

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Oversees all food preparation and kitchen service in Banquets. Responsible for the normal flow of operations on every work shift. Responsible in maintaining and control of all food and labor cost that has been budgeted. All duties are to be performed in accordance with department and property policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Oversee all kitchen-related activities pertaining to the normal operation of the Banquets, Menu & Staff.
- Continuously create new menu items and specialty dishes for banquets; conduct tastings as needed to test new menu items. Includes creating special menu items for special events and groups/guests.
- Manage Human Resources responsibilities for assigned department(s) to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring, training and succession planning processes that encompass the company's diversity commitment; adherence to the company's status quo third party representation philosophy; compliance with company policies, legal requirements and collective bargaining agreements.
- Continuously evaluate staffing levels in accordance with business demand, forecasts, and budgetary guidelines; ensuring necessary adjustments are made as needed.
- Monitor and enforce Company and Departmental safety policies, Health Department Standards and all other applicable.
- Responsible for all direct purchases and buying duties for the Banquet Kitchen including monitoring food cost.
- Monitor waste and over production, as well as utilizes leftovers, ensures proper rotation and quality control.
- Oversee service of menu - Supervise and assists in plate up, coordinate the buffet and reception setup. Delegate station assignments. Checks food items.
- Oversee product consistency and make necessary modifications according to business needs.
- Monitor training of new employees to help them achieve higher status.
- Oversee for all banquet events production duties list and scheduling.
- Attend and review all banquet event and pre-convention meetings when required.
- Collaborate all menus and specs with Banquet Director
- *Other job related duties as requested.*

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Banquet Chef | 14546

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	Banquet Sous Chef
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Banquet responsibility for resort; no gaming functions

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Chef | 14546

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/8/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Server | 14873

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Banquet Server to service guests with quality service and maintain the high standards set forth by the location and department. This includes, but is not limited to, setting, serving, and clearing tables during banquet and convention functions while providing excellent guest service. All duties must be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department/Company and property policies, practices, and procedures.

Essential Functions and Tasks

- Anticipates and responds effectively to guests' inquiries and needs, and promptly resolves guest complaints within scope of authority.
- Works as part of a team, assisting all guests and employees with their needs and inquiries.
- Serves and assists guests throughout the function, including serving and maintaining the guests' food and beverage orders throughout the dining experience, and utilizing banquet and ala carte techniques.
- Sets up, monitors, refreshes, and breaks down functions, such as coffee breaks, continental breakfast, and buffets as assigned, according to management and group requirements.
- Sets up, replenishes, and breaks down dining tables to include linen, glassware, silverware, condiments, accessories, and other service wares.
- Greets guests as they arrive in a positive, welcoming manner, and assists them with seating at tables according to all service standards and expectations.
- Guides the guest in all phases of their experience at the Banquet event.
- Monitors and maintains cleanliness, sanitation, and organization of assigned work areas.
- Delivers food items to tables from service kitchens and removes courses as completed.
- Promotes and maintains the highest level of customer service to all guests while staying alert to their needs.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Banquet Server | 14873

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No working on the gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Serves alcohol during banquet events
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Position for resort

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Server | 14873

The undersigned states that the information herein is true and accurate.

<u>Marikate Murren</u>	/	<u>Marikate Murren</u>	<u>2/8/2018</u>
Signature		Printed Name	Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Sous Chef | 10168

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2018

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

Responsible for all hot and cold food prepared and presented at all Banquet functions. This position will assist the Banquet Chef with overseeing and running the Banquet Kitchen. All duties performed with in company and property strategic objectives, policies, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Assist in overseeing all kitchen-related activities pertaining to the normal operation of the Banquets, Menu & Staff.
- Assist in managing Human Resources responsibilities for assigned department(s) to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring, training and succession planning processes that encompass the company's diversity commitment; adherence to the company's status quo third party representation philosophy; compliance with company policies, legal requirements and collective bargaining agreements.
- Assist in continuously evaluating staffing levels in accordance with business demand, forecasts, and budgetary guidelines; ensuring necessary adjustments are made as needed.
- Responsible for assisting Banquet Chef in monitoring food cost for their outlet, and order of all food products.
- Monitor waste and over production, as well as utilizes leftovers, and ensures proper rotation and quality control.
- Assist Banquet Chef in monitoring training of new employees to help them achieve higher status.
- Assist Banquet Chef in monitoring and enforcing Company and Departmental safety policies, Health Department Standards and all other applicable.
- Assure the overall cleanliness and equipment maintenance of their areas.
- Assist Banquet Chef in preparation of menu.
- Take inventory, coordinates with the Chef on order and preparation of food items. Delegates work assignments.
- Assist Banquet Chef in production of menu. Assists in cooking of food items, supervise staff. Coordinates with Chef on proper cooking and time.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Banquet Sous Chef | 10168

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Banquet Cooks • Kitchen Stewards
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No responsibilities on the gaming floor, machines are surrounding areas.

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Sous Chef | 10168

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/8/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Supervisor | 16225

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Banquet Supervisor to assist management staff and interact with other departments in maintaining banquet and convention facilities, plan and execute to ensure the success of banquet functions, and maintain high standards of guest services and employee relations. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Ensures that schedules are appropriate for each event.
- Coordinates with uniform control regarding any special uniform requests.
- Coordinates diagrams for buffets and/or room set-ups.
- Creates and coordinates appropriate buffet signage for banquet events.
- Collaborates with other departments to ensure the maintenance of the banquet and convention facility for front and back of the house.
- Delegates and directs work to other banquet staff, including any special requirements needed.
- Confirms any meal requirements, allergies, dietary needs, and special requests to the kitchen prior to and during the event.
- Checks all banquet event areas to ensure all rooms are set-up to the department and BEO specifications.
- Conducts team update meetings and roll call with servers.
- Ensures all staff has appropriate uniform and tools in accordance with department and property standards.
- Maintains direct communication with main contact or client prior to, during, and at the conclusion of event.
- Interacts with all other departments involved with the banquet events.
- Supervises and directs servers during set up, service, and breakdown of each event.
- Completes paperwork including but not limited to summary sheet, pop-up checks, consumption reports, Supervisor's reports, gratuity sheets, banquet checks, and sign-in sheets.
- Ensures that all coffee break dry sets are completed for the following day.
- Ensures banquet event areas, pantries, front and back of the house areas are restored to department standards at the end of the shift.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Banquet Supervisor | 16225

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Monitors and minimizes overtime according to labor and departmental standards. • Schedules and staffs for appropriate business levels.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Banquet/Culinary Specialist; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Banquet Supervisor | 16225

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Banquets Manager | 16574

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

To assist in the management and maintenance of banquet and convention facilities. Ensure that all banquet functions result in success. Promote positive guest and employee relations. Maintain the high standards set forth by this department and MGM Springfield.

Essential Functions and Tasks

- Manage daily operations and departmental performance consistent with the strategies and vision of the property.
- Manage department budget to ensure successful achievement of established goals and parameters
- Manage Human Resources responsibilities for assigned department(s) and team members to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring, training and succession planning processes that encompass the company's diversity commitment; adherence to the company's status quo third party representation philosophy; compliance with company policies, legal requirements and collective bargaining agreements.
- Continuously evaluate staffing levels in accordance with business demand, forecasts, and budgetary guidelines; ensuring necessary adjustments are made as needed.
- Delegate and manager work load and tasks to the Banquet staff, especially "special requirements needed".
- Supervise staff to ensure they adhere to, and enforce, company and department policies while being alert to their duties and responsibilities, as well as ensure all established standards of professionalism and protocol are being practiced by all staff.
- Input and maintain function diary and maintaining physical convention area, including wallpaper and carpeting in conjunction with the Director of Banquets.
- Draw and delegate diagrams for room set-up.
- Maintain all banquet and convention equipment and keep equipment organized in storage areas.
- Supervise convention porters and assist when necessary in the setup of all banquet rooms.
- Supervise and direct servers during set-up, service and breakdown.
- Check all banquet rooms to ensure all rooms are set-up to the department specifications.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Banquets Manager | 16574

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Banquet Server (20) • Banquet Supervisor (4) • Convention Service Housemen (20)
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Culinary Management; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Banquets Manager | 16574

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Bar Porter | 14879

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary:

It is the responsibility of the Bar Porter to stock necessary items and maintain bar areas to Health Department standards for efficient operation within food and beverage outlets while providing excellent guest service. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks:

- Stocks and services assigned beverage outlets, maintaining assigned levels of inventory. This includes delivering and stocking all glassware, condiments, packaged beverages, paper products, and other necessary items needed for efficient operation.
- Supports the bar area by conducting food preparation to make beverage garnishes (e.g., cutting lemons/limes).
- Is responsible for set-up and breakdown of portable bars in designated areas.
- Maintains standard of cleanliness of all beverage areas including all related assigned bar equipment, tools, supplies, trash removal, deep cleaning, sanitation, and work area (e.g., floors).
- Ensures that all chemicals are stored and used properly, including deep cleaning of assigned beverage areas.
- Ensures correct use of equipment (e.g., pallet jack, hand cart) and delivery routes.
- Organizes and maintains all beverage pump room areas, including pump room products, storage rooms, and warehouses, and identifies non-stock items and alerts management as necessary.
- Promotes and maintains the highest level of service to all guests while staying alert to their needs and responds effectively to guest inquiries. Resolves guest complaints within scope of authority; otherwise refers the matter to management. Notifies supervisor and/or Security of all unusual events, circumstances, missing items, or alleged theft.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Bar Porter | 14879

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	When assigned, might be on or near gaming floor outlets; never working on gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Stacks and stores alcohol for outlets; not responsible for sales/distribution/service
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level - Bar Cleaning

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Bar Porter | 14879

The undersigned states that the information herein is true and accurate.

Marikate Murren
Signature

/ Marikate Murren
/ Printed Name

2/8/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Bus Person | 14619

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the Bus Person to maintain the entire restaurant, including the dining room, storerooms, food pick up areas, and beverage stations according to established cleanliness and stock standards, according to standards set by the employee manual.

Essential Functions and Tasks

- Works in a well organized manner while maintaining a strong sense of urgency.
- Maintains an excellent knowledge of all table numbers and guest positions.
- Works with servers to ensure proper guest service.
- Polishes flatware.
- Sets up tables with appropriate silverware, glassware, linen, condiments, and accessories. Folds napkins properly and ensures ashtrays are clean and available on tables in designated smoking areas.
- Clears, cleans, and sanitizes booth/chair cushions and tables completely, and resets with clean linens, ashtrays, votive candles, glassware, and any additional tabletop items needed.
- Removes dirty dishes, debris, and linens from tables and brings to the kitchen for proper washing and disposing of trash in designated receptacles.
- Separates plates, mugs, glasses, and silverware into correct tubs where applicable.
- Coordinates table availability and constantly communicates with Servers, Hostesses, and Management to ensure tables are turned efficiently.
- Reports any equipment malfunctions to management immediately.
- Serves water, coffee, and soft drinks, refilling when needed.
- Ensures that dining room floors are clean and free of debris.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Bus Person | 14619

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming machines or gaming floor
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	With direction, will stack and store alcohol; no responsibilities of sales, distribution or service
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Position for Property; no gaming machine access

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Bus Person | 14619

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/8/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Bus/Runner | 14605

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Bus/Runner to maintain the assigned section and keep tables in a clean, sanitary condition. This includes removing dirty dishes and debris from the tables and supplying tables and side stations with clean dishes, silverware, glassware, and condiments. The bus/runner also works in conjunction with Food Servers to ensure that outstanding guest service is constantly achieved, while following all local and departmental policies and procedures. This includes ensuring efficient delivery of food to the restaurant, according to standards set by the employee manual.

Essential Functions and Tasks

- Maintains food and beverage stations in a clean and orderly manner.
- Cleans and sanitizes all equipment.
- Keeps all floors free of debris and spills.
- Sweeps and mops floors, and empties garbage, as required by the property.
- Maintains par stock levels in all beverage stations.
- Cleans and sanitizes all tables and chairs.
- Retrieves orders the warehouse and stocks storeroom.
- Assists with proper stock rotation.
- Runs food as required by the Department.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Bus/Runner | 14605

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or on gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Position within the property; customer service, guest experience; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Bus/Runner | 14605

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Cashier/Clerk Valet | 15007

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Valet Clerk to assist customers with checking in and out of Valet and directing traffic while providing excellent guest service. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks:

- Warmly greets and assists all guests at the Valet Front Drive areas while providing courteous, efficient and enthusiastic service.
- Monitors the traffic in designated areas.
- Monitors and directs the traffic at the Hotel Valet and Casino Valet while ensuring that safety equipment is used.
- Accommodates guests requiring special assistance and aid, such as issuing scooters and wheelchairs.
- Inputs incoming valet tickets into computerized system for valet parking customers and maintains on-hand cash.
- Inputs Information into the CVPS system from the valet tickets within 15 minutes of receiving it.
- Performs ticket reconciliation at the end of the shift to ensure all retrieved vehicles are taken out of the system.
- Maintains a clean and safe working area by picking up trash, sweeping valet areas and keeping valet booths clean.
- Promotes and maintains the highest level of customer service to all guests while staying alert to their needs.
- Responds effectively to guest inquiries in person or via phone related to the property, directions and the local area while providing excellent guest service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Responds to and resolves guest complaints in a timely manner and creatively solves problems with the ability to anticipate, recognize, evaluate and resolve potential difficulties within scope of authority; otherwise refers the

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Cashier/Clerk Valet | 15007

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH areas without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry level position within property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Cashier/Clerk Valet | 15007

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Coat Check Attendant | 10556

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Coat Check Attendant to provide excellent customer service and create a safe and friendly environment for employees and guests while holding items for guests and ensuring items are kept safe in the Coat Check area. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Warmly greets and assists all guests in the Coat Check area.
- Maintains a clean, safe, organized working area.
- Communicates and assists guests with the coat check process.
- Receives guest items for holding such as coats, jackets, sweaters, backpacks, purses or any other personal belongings.
- Hangs and organizes guests' personal items.
- Returns coats and other personal items to guests in a friendly and efficient manner.
- Maintains all paperwork, including coat check tickets and receipts.
- Responds effectively to guest inquiries related to the property, directions and the local area while providing excellent guest service.
- Promotes and maintains the highest level of customer service to all guests while staying alert to their needs.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Responds to and resolves guest complaints in a timely manner and creatively solves problems with the ability to anticipate, recognize, evaluate, and resolve potential difficulties within scope of authority; otherwise refers the matter to management.

Notifies supervisor and/or Security of all unusual events, circumstances, missing items, or alleged theft.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Coat Check Attendant | 10556

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level position for property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Coat Check Attendant | 10556

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Communications Specialist | 10606

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-1-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Communications Specialist to perform all duties in accordance with departmental and property policies, practices and procedures.

Essential Functions and Tasks

- Responsible for providing communications support to the Communications Director and others as identified.
- Create and develop press materials - press releases, fact sheets, memos, speeches and presentations.
- Manage and implement PR programs and activities as assigned.
- Coordinate with social media specialist, internal communications and third-party partners to leverage communications vehicles and opportunities as appropriate.
- Responsible for updating the MGM Springfield newsroom working closely with Director of Communications, broader marketing team and corporate communications as appropriate.
- Responsible for tracking and issuing daily MGM Springfield clip report.
- Responsible for providing support for special events, marketing events and PR events as appropriate.
- Responsible for maintaining communications tools and resources including media lists, influencer lists, Cision, and Burelles, tracking results and identifying media opportunities.
- Actively seek and share new and engaging MGMSP-related projects, promotions and programs.
- In partnership with Community Relations and Public Affairs teams, oversee editorial process for the MGMNSP Community newsletter.
- Keep abreast of the latest emerging tools in storytelling.
- Partner with Corporate and vendors to develop communications strategy and executions around key brand efforts.
- In partnership with the Communications Director, create engaging assets for storytelling efforts including infographics, videos and photos.
- Leverage mobile and social media platforms (YouTube, Facebook, and Twitter) to communicate brand story.
- Coordinate interview schedules, calendar and media opportunities with executives in partnership with executives' administrative assistants.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Communications Specialist | 10606

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Office Media Specialist; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Communications Specialist | 10606

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Convention Service Housemen | 16872

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Convention Houseperson to ensure all areas related to property and/or company related events are set up, cleaned, maintained, and broken down for all functions. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures

Essential Functions and Tasks

- Assists in setting up, cleaning, breaking down and maintaining all areas related to property and/or company related events.
- Handles all set up and break down of water coolers, water stations, cambers of ice, water pitchers, glassware and meeting amenities.
- Stocks and organizes supply carts with designated materials and equipment and transports to assigned function area.
- Inspects room set up for accuracy as per event specifications.
- Communicates any maintenance issues related to event areas to management in a timely manner.
- Maintains complete knowledge of all styles of meeting or banquet room setting standards and all health code, fire code, and safety regulations.
- Communicates with management and staff in order to fulfill and address any issues or needs requested by the guest or other employees.
- Maintains complete knowledge of correct inventory, maintenance and use of equipment.
- Monitors and maintains cleanliness, sanitation and organization of assigned work areas.
- Uses correct cleaning chemicals for designated items/surfaces according to OSHA regulations and property standards.
- Retrieves clean linen and skirting from specified location, confirms inventory and stocks in storage areas.
- Sets up rooms and function areas with designated set up equipment as per event specifications and department standards.
- Refreshes rooms per event specifications and in accordance with departmental standards.
- Breaks down function areas as scheduled in accordance with departmental standards, storing all reusable goods and return equipment to specified storage areas.
- Provides and maintains banquet trash receptacles and recycling bins to be used in event areas.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Convention Service Housemen | 16872

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Position for the Property

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Convention Service Housemen | 16872

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Convention Services Coordinator | 15076

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-30-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Convention Services Coordinator to assist the Convention Services Team with clerical and administrative support. All duties are to be performed in accordance with the department and property policies, practices and procedures.

Essential Functions and Tasks

- Answer telephones and assist customers as needed.
- Qualify incoming inquiry calls and provide details to the appropriate manager.
- Greet clients into the office and consistently provide a positive and lasting impression in all interactions.
- Assist Director of Catering / Conference Services with menus and reports.
- Act as Delphi key operator to include loading menus, menu changes, and to liaise with corporate Delphi contact.
- Send CSM Introduction/Timeline Letter accompanied by hotel information.
- Obtain Credit Application and process Credit Estimate to Credit Manager.
- Call clients to obtain Rooming Lists and process to reservations. Forward reservation confirmations, once processed. Maintain changes to the Rooming Lists via Add/Change Forms.
- Send Attrition Letters to customers at 90, 60 and 30 days prior to arrival.
- File paperwork for assigned Convention Services or Catering Managers on a daily basis.
- Ensure Banquet Check information in correct in each Delphi Booking.
- Assist Convention Services Team with proposals, contracts, BEOs and Event Resumes as needed, including any changes to the information. Log BEO changes appropriately, and handle BEO distribution.
- Handle Post-Event processes to include: Log pick-up into Delphi and send the post-convention thank you letter from the Executive Director of Sales & the Director of Catering & Conference Services.
- Assist with amenity requests, transportation requests, phone line requests, shipping requests, group restaurant reservations, show reservations, spa

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Convention Services Coordinator | 15076

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	Axillary responsibilities of MassMutual Center Ushers during events
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Convention Specialist; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Convention Services Coordinator | 15076

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Cook Casual Dining | 14622

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Cook to execute recipes, perform general production, and operate a specific station with others or individually, while ensuring preparation and service is of the highest possible quality in a timely manner. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures including health sanitation and safety policies.

Essential Funictons and Tasks:

- Communicates effectively with management and co-workers with regards to the operations of the kitchen.
- Prepares all menu items and follows recipes precisely, including conversion capabilities, and understands *mis en place*.
- Monitors and maintains cleanliness, sanitation, and organization of assigned work areas.
- Transports supplies from the storeroom and stocks in designated areas.
- Starts prep work on items needed for the particular menu of the day.
- Ensures all requisitions are processed properly and placed in designated area.
- Assists Assistant Chef and/or Executive Sous Chef and other co-workers in menu preparation, service, and breakdown of function.
- Meets with Assistant Chef and/or Executive Sous Chef and other co-workers to review assignments, anticipated business levels, changes, and other information pertinent to job performance.
- Completes opening duties such as setting up work station with required place, tools, equipment and supplies; inspecting the cleanliness and working condition of all tools, equipment and supplies; checking production schedule and pars; establishing priority items for the day; and informing the Assistant Chef and/or Executive Sous Chef or other co-workers of any supplies that need to be requisitioned for the day's tasks.
- Continues prep work after the meal period for the next meal service.
- Identifies and safely uses all kitchen equipment.
- Properly labels and dates all products to ensure safekeeping and sanitation

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Cook Casual Dining | 14622

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Kitchen-based Job Functions; no access to gaming

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Cook Casual Dining | 14622

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Director Restaurants | 10946

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-1-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The Director of Restaurants will oversee the function of the MGM Springfield's fine dining outlets. Lead restaurant management team in achieving the operational and financial goals of each restaurant, ensuring for operating the restaurant efficiently within corporate cost controls, managing, scheduling and training the staff, monitoring the performance, maintaining the facilities in accordance with MGM Springfield service standards, and ensuring high customer satisfaction and an exceptional dining experience. All duties are performed in accordance to company policies and procedures.

Essential Functions and Tasks

- Oversee restaurant managers, including establishment and achievement of profit objectives and desired standards of quality food, service, cleanliness, merchandising and promotion.
- Create and maintain positive and collaborative relationships with Restaurant Management Partners; supports decision-making and strategic vision; ensures accountability to company standards.
- Develop short term and long term financial and operational plans for the fine dining outlets, which support the overall objectives of the company.
- Regularly review and evaluate the degree of customer satisfaction of the individual outlets, to recommend new operating and marketing policies whenever a change in demand, customer dissatisfaction, or a change in competitive environment requires such changes.
- Interact positively with customers promoting hotel facilities and services. Resolve problems to the satisfaction of involved parties. Maintain communication with all departments to ensure customer service needs are met. Develop, implement, and change menu items on an as-needed basis.
- Oversee the selection, purchasing, storage, inventory, maintenance and usage of all related food and beverage supplies and equipment.
- Oversee the development, interpretation and implementation of policies, operating procedures and training programs, manuals, directives, menus, work schedules, rules and regulations for the food and beverage staff and personnel.
- Ensure compliance with health, safety, sanitation and alcohol awareness standards.
- Interview, select, train, supervise, counsel and coach restaurant staff for the efficient operation of the outlet.
- Other job related duties as requested

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Director Restaurants | 10946

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Restaurant General Managers (7)
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Culinary Management; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Director Restaurants | 10946

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/9/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Executive Chef | 10368

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the High Volume Room Chef to develop and implement current menu items and cooking techniques, foster a culture of high-performance and employee engagement, and make decisions that enhance financial and operational performance. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures including health sanitation and safety policies.

Essential Functions and Tasks

- Communicates effectively with all management and co-workers with regards to the operations of the kitchen.
- Assumes complete charge of kitchen.
- Supervises and maintains cooking standards and techniques of all employees.
- Works with Stewarding management to effectively oversee functions within the room.
- Coordinates and collaborates with various departments to ensure successful operations of the room.
- Prepares orders for daily and upcoming functions.
- Ensures proper usage and rotation of all food items.
- Checks freshness and quality of food and presentation and maintains proper inventory levels.
- Oversees all food preparation and production.
- Expedites all event food orders.

Creates new recipes and contributes to the menu format, design, and implementation.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Executive Chef | 10368

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	Monitors overtime and ensures staff motivation, training of new employees to help them achieve higher goals, human resource responsibilities to include hiring/firing, training, issuing discipline and ensure the proper documentation of all actions taken.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Executive Chef | 10368

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/9/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Executive Chef Admin | 14084

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 3-20-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

It is the responsibility of the Executive Chef to provide executive leadership and management for the Culinary team for MGM Springfield and integrate its functions into the resort experience. All duties are to be performed in accordance with departmental and MGM Springfield policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES: This section explains the job and associated tasks, etc.

- Directs F & B culinary team to ensure departmental strategic goals and intent are being met and exceeding expectations
- Oversees overall food prep and presentation and ensure to maintain quality and proper presentation of all food products.
- Responsible for obtaining maximum results in the utilization and appearance of the food, the quality levels, and standards.
- Develops new techniques of food production towards maximum guest satisfaction at minimum operating costs.
- Develops and establishes effective relationships, ensuring positive communications between all operating departments.
- Reviews, proofs, manages, and ensures accuracy for all menu changes, including proper signage, updated web information, advertising platforms, plasma reader boards, and marketing materials in various media streams.
- Reviews monthly P&L's. Analyzes and addresses areas concern and defines needs for improvement. Finds ways to improve P&L results and communicate with culinary managers accordingly to implement changes and plans of action.
- Responsible for approval of all menu development, recipes, and flavor profiles.
- Establishes plans of character, integrity, and of quality which result in the long-range continued growth and profitability of the Food & Beverage Division.
- Develops the selection, purchasing, storage, and inventory of all Food supplies and equipment.
- Works closely with local, state and governmental organizations in maintaining highest standards or health, sanitation and

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Executive Chef Admin | 14084

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No worked performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Executive Sous Chef (1) • Restaurant Executive Chefs (12 – projected) • Director of Stewarding (1)
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Assists with alcohol purchases, storage, distribution
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No secure casino BOH access without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	Non
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Executive Chef Admin | 14084

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/09/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Executive EDR Chef | 15470

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-17-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the High Volume Room Chef to develop and implement current menu items and cooking techniques, foster a culture of high-performance and employee engagement, and make decisions that enhance financial and operational performance. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures including health sanitation and safety policies.

Essential Functions and Tasks

- Communicates effectively with all management and co-workers with regards to the operations of the kitchen.
- Assumes complete charge of kitchen.
- Supervises and maintains cooking standards and techniques of all employees.
- Works with Stewarding management to effectively oversee functions within the room.
- Coordinates and collaborates with various departments to ensure successful operations of the room.
- Prepares orders for daily and upcoming functions.
- Ensures proper usage and rotation of all food items.
- Checks freshness and quality of food and presentation and maintains proper inventory levels.
- Oversees all food preparation and production.
- Expedites all event food orders.
- Creates new recipes and contributes to the menu format, design, and implementation.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Executive EDR Chef | 15470

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Monitors training of new employees to help them achieve higher goals. • Manages human resource responsibilities to include hiring/firing, training, issuing discipline and ensure the proper documentation of all actions taken.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	High-Volume Room Chef; no access to gaming floor/machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Executive EDR Chef | 15470

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/8/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: _____

JOB POSITON (AND UNIQUE JOB CODE): _____

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION:

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): _____

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	
Managerial responsibilities in any department	
Supervisory responsibilities in Human Resources or Sales and Marketing	
Responsibilities for alcohol sales, distribution, service, and/or storage	
Access to secure casino back-of-the house areas (including executive offices) without security escort	
Responsibilities for accounting and/or finance relating to the gaming establishment	
“Write” access to gaming-related casino databases	
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	
Other (please set forth other relevant information for exemption consideration)	

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): _____

The undersigned states that the information herein is true and accurate.

Signature / Printed Name Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blu Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Executive Sous Chef Outlets | 14729

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-19-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

It is the primary responsibility of the Executive Sous Chef-Ginger is to assist the Executive Chef oversee all physical aspects of kitchen operation, management of kitchen personnel, preparation and serving of food, food and labor cost control, exceeding guests' expectations as far as food quality and presentation. All duties are to be performed in accordance with departmental and property policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Assist the Executive Chef with overseeing the culinary operations in Ginger consistent with the strategies and vision of the property.
- Assist in overseeing Human Resources responsibilities to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; quality hiring, training and succession planning processes that encompass the company's diversity commitment; adherence to the company's status quo third party representation philosophy; compliance with company policies, legal requirements and collective bargaining agreements.
- Assist in overseeing the budget of the culinary aspect of the outlet and P&L. Analyze and addresses areas concern and defines needs for improvement.
- Assists Executive Chef in monitoring overtime, staff motivation.
- Oversees product consistency and makes necessary modifications according to business needs.
- Monitors waste and over production, as well as utilizes leftovers, ensures proper rotation and quality control.
- Assists Executive Chef in monitoring and enforcing Company and Departmental safety policies, Health Department Standards and all other applicable

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Executive Sous Chef Outlets | 14729

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Sous Chefs • Cooks • Pantry Workers • Kitchen Stewards
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No secure casino BOH access to admin offices without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Management position within property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Executive Sous Chef Outlets | 14729

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Fountain Worker | 16722

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-22-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Fountain Worker to provide high quality food and beverage service to guests in a fast-paced work environment, while following all local and departmental policies and procedures and in accordance to service standards.

Essential Funictons and Tasks:

- Greets guests in a prompt, positive, friendly manner and making them feel welcome by anticipating the guest's needs and responding appropriately with a sense of urgency. Bids guests farewell, using guest's name when known, and encourages them to return.
- Takes and accurately inputs orders into POS, receives payment and makes proper change, completes required transactions, and categorizes tendered receipts by media type.
- Communicates with managers, co-workers, and guests in order to fulfill and address any issues or needs requested by guests and/or other employees.
- Exhibits proper knowledge of menu items, using selling techniques and service delivery for all items on the menu.
- Prepares and serves food and beverage items to guests.
- Packs the orders as per guests' preference, and completes the order with any necessary condiments.
- Performs all opening and closing duties based upon shift assignment.
- Refills and stocks all supplies and machines within the outlet, and unloads warehouse orders, and stocks the orders to designated storage areas.
- Maintains the cleanliness of all front and back of the house areas within the outlet.
- Work as a team, assisting all guests' and employees' needs and inquiries.
Follows all health, sanitization, and safety regulations and procedures.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Fountain Worker | 16722

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Food Service position on property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Fountain Worker | 16722

The undersigned states that the information herein is true and accurate.

Marikate Murren / Marikate Murren
Signature / Printed Name

2/8/2018
Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Fountain Worker Ld | 15592

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the primary responsibility of the Lead Fountain Worker to provide outstanding service to guests in a fast-paced and ever-changing environment. As well as assisting the management team in daily operations. All duties are to be performed in accordance with departmental and property policies, practices and procedures.

Essential Functions and Tasks

- Oversee shift operations and leading assigned team members on shift; this includes working as a team, assisting all guests' and employees' needs and inquiries, coaching team members, delegating work assignments, and handling escalated guest issues.
- Interact with guests and deliver high quality guest service; handle guest complaints or concerns as they pertain to the shift and immediately notify and/or escalate as needed to management.
- Oversee and execute assigned plays and formations from Starbucks Playbook; ensure that Starbucks standards are being followed; notify management of any issues
- Coach and train new and existing Starbucks Attendants and Bus/Runners.
- Adhere to and ensure team members follow established health, sanitation and safety, and operational standards/regulations, along with property guest service standards and department policies and procedures are being followed; notify management of any issues
- Ensure par levels for daily orders are met and complete the daily order sheet to be reviewed with manager.
- Ensuring product is picked up from warehouse and brought to outlet/outlets
- Unload warehouse orders and stocking the orders to designated storage, while reconciling and confirming receipt of products with the invoice, bill of lading, and/or shipping receipt
- Transfers product between outlets, as needed.
- Perform all opening and closing duties based upon shift assignment.
- Maintain the cleanliness of the all front and back of the house areas within the outlet.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Fountain Worker Ld | 15592

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Will assist with the storage/stocking of alcohol; no responsibilities for sales, distribution.
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
"Write" access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level - Starbucks Guest Service; no access to gaming floor or machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Fountain Worker Ld | 15592

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Front Desk Representative | 14611

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the Front Desk Representative to provide excellent customer service and create a safe and friendly environment for employees and guests by selling and assigning rooms, registering guests, determining credit, rendering bills, and receiving cash and credit payments. All duties are to be performed in accordance with federal, state, and local laws, regulations, and ordinances, as well as with department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Welcomes, greets, interacts with, and assists guests in a professional manner throughout the guests' stay.
- Provides excellent service to all guests with the property's core service standards and brand attributes while staying alert to their needs.
- Exhibits a professional demeanor and willingness to assist all guests whenever possible.
- Answers property questions and provides accurate information regarding rooms, restaurants, M life, casino events, promotions, and directions.
- Resolves guest complaints within the scope of authority, and notifies the supervisor of all unusual events, missing items, or alleged theft.
- Contributes to a positive, empowering work environment by consistently performing assigned day-to-day responsibilities.
- Performs all check-in functions including, but not limited to, early check-in, late check-in, walk-ins, and verifying guest's identity according to hotel policies and procedures.
- Extends late check-out and processes all check-out and express check-out functions including, but not limited to, preparation and close out of guests' folios, collection of room keys, and providing directions to departing guests as needed.
- Provides quotes for room rates and up sells guests based on availability.
- Controls and issues room keys by producing initial keys for guests upon registration and secondary keys upon request in accordance with procedures.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Front Desk Representative | 14611

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Customer service oriented position; guest experience

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Front Desk Representative | 14611

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Front Services Attendant | 14826

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the Front Services Attendant to provide excellent customer service and create a safe and friendly environment for employees and guests by assisting guests with taxis, outside transportation, baggage and personal belongings. All duties are to be performed in accordance with federal, state, and local laws, regulations, and ordinances, as well as with department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Welcomes, greets, interacts with, and assists guests in a professional manner throughout guests' stay.
- Provides excellent service with the property's core service standards and brand attributes.
- Exhibits a professional demeanor and willingness to assist all guests whenever possible.
- Resolves guest complaints within the scope of authority, and notifies the supervisor of all unusual events, missing items, or alleged theft.
- Answers property questions and provides accurate information regarding rooms, restaurants, M life, casino events, promotions, and directions.
- Contributes to a positive, empowering work environment by consistently performing assigned day-to-day responsibilities.
- Opens doors for guests entering and exiting the property according to property standards.
- Loads and unloads baggage from guests' vehicles.
- Transports luggage and escorts guests to and from their assigned rooms and other areas of the property.
- Provides assistance, such as getting ice, to guests, offers room orientation, etc.
- Explains hotel and property amenities including, but not limited to, restaurants and hotel operations, night clubs, and spa.
- Processes tickets for guest items and/or assists with luggage.
- Processes group baggage for arrivals and departures.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Front Services Attendant | 14826

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level position within property; no access to gaming machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Front Services Attendant | 14826

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Front Services Supervisor | 17118

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the Front Services Supervisor to provide excellent customer service and create a safe and friendly environment for employees and guests by assisting guests with taxis, outside transportation, baggage and personal belongings. All duties are to be performed in accordance with federal, state, and local laws, regulations, and ordinances, as well as with department and Company policies, practices, and procedures

Essential Functions and Tasks

- Supervise Front Services, including Valet and Bell/Door, daily functions, operations, and team
- Supervise operational functions of assigned Bell and Door departments including delegating work assignments, supporting the manager with department needs consistent with the strategic plan and vision for the department, division and property
- Resolve escalated guest and employee issues, ensuring everyone is treated with mutual respect.
- Maintain and update employee schedules, including reviewing and approving vacation requests and special event scheduling, opening/closing time clocks, and reviewing and editing punches in the time keeping system
- Participate in candidate selection process, including interviewing and making hiring recommendations
- Coach and train employees, make discipline and termination recommendations to the manager as needed.
- Create a work environment that promotes teamwork, recognition and mutual respect.
- Maintain policy and procedures standards and ensure training programs reflect appropriate employee development guidelines; issue commendations and disciplinary actions when necessary.
- Ensure guests are treated courteously, complaints and problems are resolved, and requests for special services are carried out by monitoring staff with customer interaction.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Front Services Supervisor | 17118

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Attd Front Services • Attd Valet • Clerk Valet • Attd Coat Check
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Assistance/Management of Front Desk, customer service and guest experience

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Front Services Supervisor | 17118

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Gourmet Food Server | 15590

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Gourmet Food Server to provide high quality food and beverage service to guests. All duties must be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department/Company and property policies, practices, procedures, and service standards.

Essential Functions and Tasks

- Possesses and maintains an in- depth of knowledge on all food and beverage products served at the property.
- Provides prompt, friendly, courteous and outstanding food and beverage guest service at all times, while anticipating guest needs.
- Serves alcoholic beverages to guests and verifies age of any guest who looks under the age of thirty. Alerts Management immediately if any guest appears to be intoxicated.
- Thanks all guests and uses guest surname, if known.
- Maintains cleanliness of the entire area including the floors, tables, ledges, counters, etc.
- Maintains complete familiarity with all menu items and specials.
- Follows all uniform and appearance standards.
- Ensures that tables are properly set, side stations are clean, and all side work is properly done.
- Resets tables after use and accurately rings all charges through the POS system.
- Maintains proper sanitary and safety practices.
- Offers additional service to ensure an outstanding guest experience.
- Assists with initial guest complaints and informs manager on duty immediately.
- Maintains the ability to service assigned stations as required.
- Remains in control and maintains composure during high volume situations.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Gourmet Food Server | 15590

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Food Service position on property; no access to gaming machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Gourmet Food Server | 15590

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Gourmet Host Person | 15632

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the primary responsibility of the Gourmet Host Person to greet and seat guests and assist Food Servers, Bus Persons, and Food Service Runners related to guest contact and table information. All duties are to be performed in accordance with departmental and property policies, practices, and procedures, as well as operational service standards.

Essential Functions and Tasks

- Maintains positive guest relations at all times, including greeting guests with eye contact and a smile and wishing guests a fond farewell as guests depart, and offers excellent service to ensure a memorable guest experience. Utilizes guests' names throughout interactions, if known.
- Resolves guest complaints, ensuring guest satisfaction.
- Seats guests, following proper rotation and accommodating all guest requests when possible
- Oversees daily restaurant reservations and pre-assigning seating
- Maintains a comprehensive knowledge of the restaurant's sequence of service to assess table turns and accurately quote wait times and book reservations.
- Delivers guest beverages from the lounge/bar to the table when required.
- Oversees daily restaurant reservations using the reservation book and/or Table Management system(s), and manages the wait list to ensure seat times are timely and accurate.
- Communicates with restaurant management and Restaurant Reservations regarding special orders, cake orders, and special requests.
- Sets up Host Person station with necessary supplies, maintains cleanliness at all times, and answers restaurant telephone courteously and efficiently. Shuts down podium, and forwards phones to voice-loop at end of shift.
- Maintains complete knowledge of scheduled daily activities and in-house groups, daily house count, table/seat/station numbers, proper table set ups, room capacity, hours of operation, price range, and dress code of the restaurant.
- Maintains a comprehensive knowledge of menu and guest offerings, and accurately answers guest questions regarding all aspects of the restaurant.
- Recognizes repeat and VIP customers, and anticipates their needs to provide an excellent guest experience. Assists Management with approvals on VIP checks as

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Gourmet Host Person | 15632

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level - Food Guest Service position on property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Gourmet Host Person | 15632

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Arts Coord | 10566

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-1-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

The Production and Graphic Arts Coordinator is responsible for managing and tracking the design, approval, proofreading, and production processes of advertising materials for assigned internal clients of MGM Springfield.

ESSENTIAL FUNCTIONS AND TASKS

- Creates and maintains production traffic schedule; initiates and assigns job requests, assigns job number, manages work flow of jobs to ensure that goods and services for various accounts are provided in a timely manner.
- Coordinates print/electronic and production jobs with graphic artists, Purchasing Department, internal clients and various vendors.
- Communicates regularly with dedicated internal clients and serves as a liaison to all departments.
- Facilitates and attends meetings with internal clients.
- Prepares requisitions and purchase orders for all goods and services purchased by the Advertising Department.
- Examines for accuracy and prepares for payment all vendor invoices. Audits agency and all other advertising billing.
- Secures other pertinent information relating to each job: inventory on hand, par level, quantity required, disclaimers, and delivery location.
- Obtains necessary approvals as applicable, while maintaining brand standards as set by MGM Resorts International and MGM Springfield.
- Maintains files for all completed jobs.
- Proofreads advertising projects in their final stage to check for errors.
- Prints and produces select design projects in the on-property print room.
- Laminates projects as needed using the on-property laminating machine.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Graphics Arts Coord | 10566

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH areas without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	No access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Arts Coord | 10566

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Designer | 10735

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-1-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the primary responsibility of the Graphic Designer to modify and revise a wide range of digital files for all brands and sub-brands within MGM Springfield. All duties are to be performed in accordance with departmental and MGM Springfield policies, practices and procedures.

Essential Functions and Tasks

- Design posters, brochures, newsletters, electronic communications, and logos.
- Determine size and arrangement of illustrative material and copy, and select style and size of type.
- Confer with internal clients to discuss and determine layout design.
- Create designs, concepts, and sample layouts, based on knowledge of layout principles and esthetic design concepts.
- Maintain archive of images, photos, or previous work products.
- Develop graphics and layouts for product illustrations, company logos, and Web sites.
- Use computer software to generate new images.
- Review final layouts and suggest improvements as needed.
- Photograph layouts, using camera, to make layout prints for supervisors or clients.
- Study illustrations and photographs to plan presentation of materials, products, or services.
- Mark up, paste, and assemble final layouts to prepare layouts for printer.
- Modify or revise complex digital that RIP correctly and print properly for a variety of media.
- Conducts research and designs pre-shift briefings.
- Support the department with other clerical and organizational services of electronic and print collateral.
- Efficiently handle high-volume workload, and ensure all deadlines are met.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Graphics Designer | 10735

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Design Creating & Management; no access to gaming machines/systems

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Designer | 10735

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Supervisor | 17120

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-1-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

The Graphics Supervisor is responsible for supervising all graphic and multimedia design as well as production for all brands and sub-brands within the property. All duties are to be performed in accordance with departmental and property policies, practices and procedures

Essential Functions and Tasks

- Supervising daily operations and departmental performance consistent with the strategies and vision of the department under the guidance of the Executive Director.
- Assist with Human Resources responsibilities to include: creating a work environment that promotes teamwork, performance feedback, recognition, mutual respect and employee satisfaction; Making hiring recommendations, assisting with training and succession planning processes that encompass the company's diversity commitment; compliance with company and department policies, and legal requirements.
- Collaborate with agency to amplify agency work and creative campaigns.
- Develop, design, or create new applications, ideas, or products.
- Oversee and manage the production of various print and digital items both internally and through vendors.
- Efficiently handle and delegate high-volume workload, and ensure all deadlines are met by graphic design team.
- Cultivate a creative and collaborative environment to inspire design and build cohesive teams.
- Determine size and arrangement of illustrative material and copy, and select style and size of type.
- Study illustrations and photographs to plan presentation of materials, products, or services.
- Use a variety of tools, applications and computer software to generate new images.
- Modify or revise complex digitals, RIP correctly, and print properly for a variety of media Mark up, paste, and assemble final layouts to prepare layouts for printer.
- Draw and print charts, graphs, illustrations, infographics, and other artwork, using computer applications.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Graphics Supervisor | 17120

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	Graphics Designer
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Graphic Designing/Management; no access to gmaing floor/machines/systems

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Graphics Supervisor | 17120

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Guest Experience Specialist | 16154

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

The Guest Experience Specialist is responsible for partnering with the Guest Experience Manager on the development, execution, and sustainability of company-wide guest service improvement initiatives in support of the Company's overall guest service strategy.

Essential Functions and Tasks

- Proactively answer phones, greet, interact with and assist guests in a professional manner to foster positive and lasting relationships.
- Collaborate with property and company leaders to identify and resolve root causes of guest concerns.
- Craft customized response using appropriate language and tone to represent the company and properties/brands within the portfolio.
- Provide administrative support to all guest experience initiatives and service programs.
- Support Guest Experience Manager with pre-arrival process by reviewing arrival list, contacting guests prior to arrival and making necessary reservations.
- Assist manager with analyzing guest feedback across multiple platforms and create reports highlighting pertinent data.
- Assist customers with the redemption of hotel and risk management offers.
- Take full ownership of guest concerns/complaints; resolve issues immediately and follow up to ensure guest satisfaction. Involve management when necessary.
- Ensure all methods of communication to property and company leaders are current, including but not limited to, reports and SharePoint data.
- Read, investigate, and respond to guest comments, complaints, or inquiries posted on travel review sites included but not limited to TripAdvisor, Yelp, Hotels.com, Expedia, and more as necessary.
- Assist in managing the Company's internal Guest Experience Shop program including reporting, analysis and providing recommendations to participants to further enhance report quality, and collaboration with key corporate and property service stakeholders to diagnose and address identified service challenges.
- Conduct on-going internal Guest Experience shops for comprehensive understanding of expectations and knowledge of standards.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Guest Experience Specialist | 16154

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Desk Guest Service, customer service, guest experience; no access to gaming equipment, machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Guest Experience Specialist | 16154

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Guest Room Attendant | 14628

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the responsibility of the Guest Room Attendant to provide excellent customer service and create a safe and friendly environment for employees and guests while cleaning and servicing guestrooms. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Promotes and maintains the highest level of service to all guests while staying alert to their needs.
- Responds effectively to guest inquiries related to the property and the local area while providing excellent service.
- Responds to and resolves guest complaints in a timely manner and creatively solves problems. Anticipates guest needs within scope of authority, and notifies supervisor and/or Security of all unusual events, circumstances, missing items, or alleged theft.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Properly utilizes performance feedback, recognition, and training.
- Dusts and cleans all furniture (e.g., picture frames, mirrors, windows, baseboards, carpet edges, inside and outside door panels, door ledges, and thresholds).
- Cleans guest rooms by replacing linens, making bed(s), following property's green initiatives for bed linens and terry, vacuuming, emptying trash, and wiping down or dusting all surfaces. Performs deep cleaning details as assigned.
- Cleans bathrooms by scrubbing basins, bathtubs, shower walls, doors, sinks, toilets, vanities, mirrors, and floors using proper equipment and approved chemicals as applicable. Places clean bathmats on tubs and/or shower doors and clean towels on towel racks and vanities.
- Replenishes all information folders and guest amenities (e.g., ashtrays, glassware, soaps, supplies, tissues).
- Checks and replaces all missing items in rooms (e.g., hangers, ice bucket liners, hair dryers, stationery).

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Guest Room Attendant | 14628

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Position within property; no access to gaming systems/machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Guest Room Attendant | 14628

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: _____

JOB POSITON (AND UNIQUE JOB CODE): _____

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION:

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): _____

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	
Managerial responsibilities in any department	
Supervisory responsibilities in Human Resources or Sales and Marketing	
Responsibilities for alcohol sales, distribution, service, and/or storage	
Access to secure casino back-of-the house areas (including executive offices) without security escort	
Responsibilities for accounting and/or finance relating to the gaming establishment	
“Write” access to gaming-related casino databases	
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	
Other (please set forth other relevant information for exemption consideration)	

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): _____

The undersigned states that the information herein is true and accurate.

Signature / Printed Name Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Hair Stylist | 10847

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-20-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Hair Stylist to provide hair services, which includes haircuts, blow drying, styling, hair treatments, chemical services, up-dos, and hair extensions while providing prompt, expert, and courteous service to all guests. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Provides hair services including haircuts, blow drying, styling, hair treatments, chemical services, up-dos, hair extensions, and waxing while upholding all state board standards.
- Maintains the safety of all guests and staff by providing a clean and sanitary work environment, including sanitizing, disinfecting, and sweeping.
- Disposes of soiled linens.
- Provides guests with current information involving the latest hair techniques and procedures.
- Stocks work stations, and informs management of necessary inventory needing replacement.
- Completes services promptly in the time allotted while maintaining professional and courteous behavior to all guests and employees.
- Checks equipment for damage and to identify needed repairs.
- Attends mandatory training to stay current on all hair style and color trends.
- Responds effectively to guest inquiries related to the property and the local area while providing excellent service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Promotes and maintains the highest level of service to all guests, including smiling, greeting, and making eye contact, while staying alert to their needs.
- Resolves guest complaints within scope of authority; otherwise refers the matter to management. Notifies supervisor of all unusual events, circumstances, missing items, or alleged theft.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Hair Stylist | 10847

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Hair Cosmetic Specialist; customer service; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Hair Stylist | 10847

The undersigned states that the information herein is true and accurate.

Marikate Murren
Signature

/ Marikate Murren
Printed Name

2/8/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: _____

JOB POSITON (AND UNIQUE JOB CODE): _____

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION:

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): _____

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	
Managerial responsibilities in any department	
Supervisory responsibilities in Human Resources or Sales and Marketing	
Responsibilities for alcohol sales, distribution, service, and/or storage	
Access to secure casino back-of-the house areas (including executive offices) without security escort	
Responsibilities for accounting and/or finance relating to the gaming establishment	
“Write” access to gaming-related casino databases	
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	
Other (please set forth other relevant information for exemption consideration)	

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): _____

The undersigned states that the information herein is true and accurate.

Signature / Printed Name Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Hotel Sales Coordinator | 15141

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-30-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

Provide high-level administrative support by conducting research, preparing statistical reports, collecting and processing sensitive data (financials, credit card and commissions payments), resolving guest issues, performing clerical functions such as preparing correspondence internal and external, managing a small number of accounts, receiving visitors, arranging conference calls, scheduling meetings, meal appointments, manage and maintain the schedules and workflow of three (3) Sales executives. Given that the Sales Coordinator is a liaison between the company and its clients, excellent writing skills, concise verbal communications and listening skills are necessary. This position will have client interaction with regard to leads, hotel needs and client travel. All duties are to be performed in accordance with departmental and MGM Resorts International policies, practices and procedures.

Essential Functions and Tasks

- Prepare and edit correspondence, communications, presentations and other documents
- Design and maintain databases
- Design and maintain spreadsheets
- Process reservations, confirmations, cancellations, special handling alerts, and amenities
- Upload and update content on SharePoint
- File and retrieve documents and reference materials
- Conduct research and collect data to prepare reports and documents
- Manage and maintain executives' schedules, appointments and travel arrangements
- Arrange and co-ordinate meetings, events and meal appointments
- Record, transcribe and distribute minutes of meetings
- Monitor screen respond to and distribute incoming communications

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Hotel Sales Coordinator | 15141

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Hotel Specialist, customer service; entry level position within property

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Hotel Sales Coordinator | 15141

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): House-person Housekeeping | 14629

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Posisiotn Summary

It is the responsibility of the House Person is to provide excellent customer service and create a safe and friendly environment for employees and guests by ensuring timely delivery of requested items, ensuring guest hallways are cleaned, detailed, and free of debris, and assisting Guest Room Attendants and other housekeeping department staff. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Promotes and maintains the highest level of service to all guests while staying alert to their needs.
- Responds effectively to guest inquiries related to the property and the local area, while providing excellent service.
- Responds to and resolves guest complaints in a timely manner, creatively solves problems, anticipates guest needs within scope of authority, and notifies supervisor and/or Security of all unusual events, circumstances, missing items, or alleged theft.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Follows all procedures for safety, general cleaning, deep cleaning, and mattress-flipping.
- Maintains inventory levels of supplies including, but not limited to, bed and bath linens, toiletries, cleaning supplies, paper supplies, and guest room amenities.
- Delivers supplies to Guest Room Attendants (GRA) and other housekeeping department staff and monitors available stock.
- Fills cleaning chemical bottles as assigned in accordance with departmental policies and procedures.
- Moves inventory products from receiving area to designated areas.
- Removes trash from guest floor service landings and removes and replaces trash container liners as needed.
- Cleans and dusts property fixtures, carpet edges, baseboards, lamps, shades, and picture frames, and keeps stairwell exits clean and free from

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): House-person Housekeeping | 14629

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level position for property, customer service; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): House-person Housekeeping | 14629

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Housekeeping Floor Supervisor | 16851

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Position Summary

It is the primary responsibility of the Housekeeping Supervisor to provide excellent customer service and create a safe and friendly environment for employees and guests by overseeing the day to day operations of assigned floors and to ensure the overall cleanliness of property rooms. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Responds to and resolves guest complaints in a timely manner and creatively solves problems with the ability to anticipate, recognize, evaluate, and resolve potential difficulties.
- Meets the demands of a fast-paced environment by using good judgment and the ability to multitask.
- Promotes and maintains the highest level of customer service to all guests while staying alert to their needs.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Completes all duties in accordance with property standards and procedures, and adheres to all company policies and legal requirements regarding safety, health, and welfare of guests, employees, and the property.
- Inspects guest rooms completely and thoroughly for cleanliness.
- Enters or calls all statuses of guest rooms work orders, carpets, damages, etc.
- Maintains knowledge of Hotel information in order to answer guest inquiries.
- Maintains records including repairs needed, lost and found items, and quality of work completed by employees.
- Completes daily worksheets accurately and in a timely manner.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Housekeeping Floor Supervisor | 16851

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> Instructs employees and new hires on the products used for cleaning in accordance with Occupational Safety and Health Administration (OSHA) chemical Right to Know standards.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
"Write" access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Hotel Cleaning Management; customer service; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Housekeeping Floor Supervisor | 16851

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Inventory Clerk | 10450

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 9-7-2017
<i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i>	
<p>It is the primary responsibility of the Inventory Control Clerk to prep, batch and scan paperwork to Shared Services for payment, conduct physical inventories, and research inventory variances. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.</p>	
<u>POSITION RESPONSIBILITIES/DUTIES:</u>	
<ul style="list-style-type: none">• Creates, maintains and updates accurate records of all inventory transactions.• Assists in maintaining warehouse requisitions to other departments within the property.• Performs and documents inventory control operations in accordance with the guidelines established through quality control and department policies and procedures.• Operates various scanners to add items into Accounts Payable system.• Performs computer data entry using Inventory/Purchasing System.• Practices courtesy in all dealings with co-workers and management.• Maintains work area in a clean and orderly condition.• Identifies and resolves customer complaints/issues.• Strives to continuously learn additional skills and capabilities to effectively handle new assignments and responsibilities consistent with company needs.• Assists in preparing material and equipment for inventories.• Assists cost accountants in conducting required, periodic physical inventories.• Recognizes new/additional work opportunities for the company and/or more efficient ways of accomplishing assigned tasks, and report to a cost accountants and or I/C manager.• Able to break/cover checkpoint.• Able to break/cover the wine vault, if applicable to property.	

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Inventory Clerk | 10450

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Inventory Specialist; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Inventory Clerk | 10450

The undersigned states that the information herein is true and accurate.

<u>Marikate Murren</u>	/	<u>Marikate Murren</u>	<u>2/9/2018</u>
Signature	/	Printed Name	Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Kitchen Steward | 15647

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Kitchen Worker to perform various dishwashing and general kitchen cleaning/stocking duties. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks

- Operates dishwasher machines in accordance to sanitization and safety standards.
- Receives soiled dinnerware, flatware, and glassware, placing items according to size and likeness into automatic dishwashing equipment.
- Removes washed dinnerware, flatware, and glassware; and stacks them according to size and likeness for future use.
- Polishes washed dinnerware, flatware, potware, and other items as designated.
- Sets up and breaks down banquets as required, including transporting dirty and clean dinnerware, flatware, potware, and other items to designated areas, as necessary.
- Utilizes proper cleaning chemicals for designated cleaning and sanitization.
- Cleans and sanitizes large kitchen equipment.
- Returns items not satisfactorily cleaned for a second wash.
- Sweeps and mops kitchen, refrigerator, and freezer floors.
- Receives, processes, and stocks deliveries in designated areas, and transporting food to designated areas, as necessary.
- Scrubs walls and trashcans.
- Handles recyclables and food waste as needed.
- Picks up and disposes trash in designated areas.
- Cleans floor mats per department standard.
- Maintains and strictly abides by State sanitation/Health regulations and Hotel requirements.
- Utilizes proper food handling techniques in accordance with local health and safety standards, including properly labeling and dating all

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Kitchen Steward | 15647

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Kitchen Cleaning position within property; no access to gaming equipment

(Continue to Page 3)



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Laborer | 14639

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Laborer to assist all trades. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Functions and Tasks:

- Assists all trades (e.g., painters, engineers, electricians, welders, gardeners, carpenters, upholstery shop).
- Maintains cleanliness of shops, such as taking out trash, sweeping, and picking materials up from job sites.
- Delivers material to tool room and shops from receiving.
- Moves and replaces furniture from different functions.
- Maintains all work orders concerning the shop.
- Drives company truck/vehicle and delivers parts.
- Stocks the warehouse and maintains inventory.
- Transports goods to and from property.
- Maintains a constant awareness of safety and accident prevention, including safely operating lifts.
- Responds to and resolves guest complaints in a timely manner and creatively solves problems with the ability to anticipate, recognize, evaluate, and resolve potential difficulties.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Laborer | 14639

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH areas without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry level position in property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Laborer | 14639

The undersigned states that the information herein is true and accurate.

 Marikate Murren
Signature

 Mairkate Murren
/ Printed Name

 2/9/2018
Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Lead Warehouse Attendant | 14561

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 9-7-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

Under the direction of the Warehouse Manager or Supervisor, the Lead Warehouse Attendant will assist and participate in compiling reports, warehouse planning, documentation requirements; accepted warehousing methods, procedures and techniques. This position will lead and coach staff members and

POSITION RESPONSIBILITIES/DUTIES:

- Lead, organize, and review the work of staff; notify management of any prevalent issues
- Independently perform the most difficult warehouse receiving and delivery procedures.
- Inspect all storage areas and inventory to assure that receivers have kept them in a neat and orderly manner.
- Operate a variety of warehouse equipment including forklifts, electric carts, pallet jacks and hand trucks in a safe and effective manner.
- Operate office equipment including computers. This includes research in Stratton Warren pertaining to item numbers, locations and item history.
- Assist with warehouse checkpoint when Inventory Control is unavailable. This includes logging requisitions and distributing requests to Warehouse Attendants.
- Respond to requests and inquiries from property personnel.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Lead Warehouse Attendant | 14561

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Lead, organize, and review the work of staff, warehouse attendants
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Warehouse Management, customer service; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Lead Warehouse Attendant | 14561

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Manager Food & Beverage Project Admin | 10684

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 10-11-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The Manager F & B Project Admin is responsible for leading the coordination and prioritization of multiple projects within the scope of the Food & Beverage team. In this role, the manager will be responsible for maintaining the project database and critical path for all projects. This position is responsible for partnering with all divisions and corporate support departments in driving the successful completion of new Food and Beverage projects according to set timelines. All duties are to be performed in accordance with departmental and MGM Springfield policies, practices, and procedures.

Essential Functions and Tasks

- Supports Vice President of Food & Beverage in new resort food and beverage development and other projects
- Leads and tracks progress of projects in food and beverage development
- Collaborates with company subject matter experts to gain key insights, comments, and direction to ensure development projects deliver highly functional units
- Periodically publishes and/or presents food and beverage development schedules to key stakeholders
- Provides timely feedback and accurate information to all relevant key stakeholders throughout the development process
- Works with various internal and external partners to prepare concept presentations for key decision makers
- Coordinates and distributes project information, timing, events, and other communication to venues partners
- Creates and develops project database with critical path assigned to each project, key milestones within each project highlighted and presented to the work team with appropriate lead time
- Creates project calendars, schedules, and critical paths to accurately estimate time and resources required to complete projects
- Organizes and communicates relevant information to key stakeholders, and asks for/assigns appropriate resources to each phase
- Partners with property food and beverage and Corporate Food and Beverage Strategy in developing and implementing food and beverage operator tool kits
- Work in conjunction with operations team to develop SOP's, recruitment plan, staffing guidelines and training plans for each new venue
- Participates in the hiring process and will provide recommendations for key food and beverage leadership positions
- Creates and deploys training programs for pre-opening restaurants
- Deploys and manages the opening task force teams

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Manager Food & Beverage Project Admin | 10684

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming machines; will be in F&B outlets on gaming floor, surrounding area
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	Assists in decision making for alcohol sales and storage for department
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Culinary Management/Administration, customer service, no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Manager Food & Beverage Project Admin | 10684

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/9/2018

Date

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MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Manicurist | 10851

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-20-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Manicurist to perform various manicure/pedicure procedures while providing prompt, expert, and courteous service to all guests. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Provides nail care services including manicures, pedicures, hand/feet paraffin, sculptured nails, tips with or without overlays, fills, polish changes on hands or feet, and nail repairs as required by the Spa while upholding all state board standards.
- Ensures all equipment and work areas are kept clean, sanitized, neat, stocked, and orderly at all times.
- Escorts guests from lounge area to designated work space.
- Provides guests with the most up-to-date techniques available, while ensuring a comfortable and relaxing spa experience.
- Maintains equipment in assigned work area and reports equipment that is broken, damaged, unsafe, or in need of immediate repair to Salon Management.
- Recommends retail products and maintains awareness of new products and procedures.
- Stocks work stations, and informs management of necessary inventory needing to be replaced.
- Responds effectively to guest inquiries related to the property and the local area while providing excellent service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Promotes and maintains the highest level of service to all guests, including smiling, greeting, and making eye contact, while staying alert to their needs.
Resolves guest complaints within scope of authority; otherwise refers the matter to management. Notifies supervisor of all unusual events, circumstances, missing items, or alleged theft.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Manicurist | 10851

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	Spa/Salon Supervisor (2)
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Cosmetic Specialist, customer service, guest service oriented position; non-gaming

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Manicurist | 10851

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Mgr Training Dev - F&B | 15767

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

POSITION SUMMARY:

The Training Development Manager will create, implement, and manage all training-related activities for a specific division Food and Beverage and lead the department into productive working methods by setting an example and utilizing all available training tools. It is the primary responsibility of the Training Development Manager to oversee division performance with regards to staff, compliance, training, projects and guest service, and will ensure professional, efficient operation while providing leadership, guidance, training and organization. All duties are to be performed in accordance with departmental and property policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Develop/create, implement, and oversee execution of training based on the strategic needs of the division.
- Design training and developmental programs and processes for employee skill enhancement and career development that target individuals as well as groups.
- Perform cause, knowledge, or gap analyses to help determine appropriate training delivery options.
- Research and develop curriculum that is appropriate to the business needs and advances the effectiveness of the learning function by recommending appropriate methods and tools to address training needs.
- Solicit and analyzes feedback to increase effectiveness of training through focus groups, subject matter experts, and other methodologies.
- Design new or customize existing corporate training programs and initiatives that align with MGM National Harbor's service philosophy, support achievement of various industry ratings (e.g. AAA Diamond Award, and Forbes Star ratings), and comply with established safety and regulatory requirements (e.g. OSHA)
- Construct leader guides, participant manuals, course evaluations, and other supportive materials to enhance performance

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Mgr Training Dev - F&B | 15767

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Training position within property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Mgr Training Dev - F&B | 15767

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Outlet Chef - Exec Chef | 11062

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Gourmet Room Chef to develop and implement current menu items and cooking techniques, foster a culture of high-performance and employee engagement, and make decisions that enhance financial and operational performance. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures including health sanitation and safety policies.

Essential Functions and Tasks

- Communicates effectively with all management and co-workers with regards to the operations of the kitchen.
- Assumes complete charge of kitchen.
- Supervises and maintains cooking standards and techniques of all employees.
- Works with Stewarding management to effectively oversee functions within the room.
- Coordinates and collaborates with various departments to ensure successful operations of the room.
- Prepares orders for daily and upcoming functions.
- Ensures proper usage and rotation of all food items.
- Checks freshness and quality of food and presentation and maintains proper inventory levels.
- Oversees all food preparation and production.
- Expedites all event food orders.

Creates new recipes and contributes to the menu format, design, and implementation.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Outlet Chef - Exec Chef | 11062

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or on gaming machines
Managerial responsibilities in any department	Manages staff including hiring/firing, training, issuing discipline and ensure the proper documentation of all actions taken.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Culinary Management, customer service in F&B

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Outlet Chef - Exec Chef | 11062

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Painters/Carpenters | 14572/14573

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017
<i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i>	
Painter:	
It is the responsibility of the Painter to apply paint as needed by roller, hand brush, or spray gun, to tape and drywall finishes, to repair and install wallcovering, and to perform necessary caulking. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.	
Carpenter:	
It is the responsibility of the Carpenter to lay out jobs, repair, assemble, install, and fabricate temporary and permanent building additions, repairs, partitions, furniture, and millwork within the facilities. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.	
Essential Functions and Tasks:	
Painter:	
<ul style="list-style-type: none">• Applies paint using a roller, hand brush, or spray gun on all types of furniture, fixtures, walls, ceilings, etc.• Installs and repairs wallpaper throughout the property.• Patches and prepares surfaces for paint or wallpaper, including sheet rock patches and caulking.• Refinishes all types of furniture.• Applies tape and drywall finish as required.• Applies acoustical ceiling finishes and other textured finishes.• Advises Supervisor of all work orders and/or projects currently being worked on, the scheduling of projects, and materials needed for such projects.	

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Painters/Carpenters | 14572/14573

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	General repairs on areas on and surrounding gaming floor; never on gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry level position in property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Painters/Carpenters | 14572/14573

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Pantry Worker |14624

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Pantry Worker to prepare food for presentation and to set up the assigned pantry service line and/or prep stations. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

Essential Funictons and Tasks:

- Maintains necessary knowledge of food/menu products, including food presentation.
- Reads, measures, and converts measurements accurately in order to execute recipes and prepare dishes.
- Ensures all products are rotating on a first-in, first-out philosophy.
- Ensures all requisitions are processed properly and placed in designated area(s).
- Properly wraps/stores, labels, and dates all products to ensure safekeeping and sanitation.
- Receives, processes, and stocks deliveries in designated areas.
- Applies basic knife skills required for preparation.
- Follows proper food temperatures and logs during preparation, as necessary.
- Assists other team members as needed in the execution of service.
- Works as a team, assisting all guests' and employees' needs and inquiries.
- Maintains complete knowledge of correct maintenance and use of equipment.
- Monitors and maintains cleanliness, sanitation, and organization of assigned work areas, including maintaining and strictly abiding by state sanitation/health regulations and hotel requirements.
- Utilizes proper food handling techniques in accordance with local health and safety standards, including properly labeling and dating all products to ensure safekeeping and sanitation.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Pantry Worker |14624

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level - Food Storage position on property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Pantry Worker |14624

The undersigned states that the information herein is true and accurate.

Marikate Murren

Signature

/ Marikate Murren

/ Printed Name

2/8/2018

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Pastry Chef | 14958

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The Pastry Chef is responsible for the overall operation of the Bakery in areas of production, quality standards and preparation in accordance with departmental goals for excellence. All duties are to be performed in accordance with departmental and property policies, practices and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Direct and oversee all functions of the property Pastry Shop
- Develop and oversee adherence to the department budget
- Develop and issue recipes to department chefs and bakers and ensure that directions are followed on all approved recipes
- Manage and execute HR-related functions over the Pastry Shop team, including but not limited to hiring, terminating, disciplining, and facilitating performance reviews.
- Direct the production of all baked goods in required volume and according to established quality standards
- Develop department policies and procedures that ensure waste is minimized, all food is handled and prepared safely and within compliance of established health and sanitation regulations
- Ensure that work area and equipment is maintained in a safe, sanitary and operable condition according to health and safety regulations
- Strategically source raw materials necessary to maintain production of required volume and ensure proper and safe rotation of stored products, both cooked and raw. Inspect new raw materials to ensure they meet established standards of quality
- Ensure that department supplies and inventories are maintained
- Establish and maintain effective channels of communication and cooperate with others in matters of mutual concern
- Follow all food sanitation and safe food practices as described by division leadership and external regulatory bodies, both written and oral instruction
- Ensure employees meet dress code, appearance standards, safety, cleanliness and customer satisfaction according to established MGM Resorts policies

(Other job related duties as requested)

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Pastry Chef | 14958

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	<ul style="list-style-type: none"> • Sous Chef Pastry
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Specialty Chef, customer service in F&B

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Pastry Chef | 14958

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Room Coordinator | 15139

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Room Reservations Coordinator to oversee room reservations. All duties are to be performed in accordance with departmental and properties policies, practices and procedures.

Essential Functions and Tasks

- Facilitate large party and group bookings and process all group reservations; between 10 to 40 rooms.
- Answer multi-phone lines to manage the reservations queue, answer guest / group questions and direct calls to other departments as necessary.
- Collaborate with Convention Sales to coordinate room blocks which are set aside for companies holding meetings in the hotel, including the number of rooms the group has utilized and what is remaining for them to pick up as well as the Catering department regarding banquet needs.
- Monitor cutoff dates to prevent convention groups from booking at their convention rate, and group blocks effectively.
- Communicate all group information to the Front Desk to ensure a high quality of customer service.
- Change, cancel, and reconfirm existing reservations as it pertains to groups and / or wholesale reservations.
- Create individual files and group masters with designated information for each group booking received from the Sales Department. Update changes received from Sales.
- Send guest correspondence as needed.
- Initiate deposit refunds for non-group reservations. Set up proper billing accounts (i.e. sharewiths, room/tax/incidentals, tax exempt, direct/special billing) and process advance deposits.
- Anticipate guests' needs, respond promptly and acknowledge all guests, no matter how busy or time of day.
- Stay up-to-date with all hotel services/features and local attractions/activities to respond to guest inquiries accurately.
- Provide excellent service consistent with the company's core service standards and brand attributes.
- Own all requests and complaints; resolve issues immediately and follow up to ensure the guest's satisfaction.
- Identify and report defects throughout the Hotel; notify supervisors immediately of hazards, injuries, equipment or processes that negatively

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Room Coordinator | 15139

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Phone/Room Booking Service, customer service, guest experience position within property

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Room Coordinator | 15139

The undersigned states that the information herein is true and accurate.

<u>Marikate Murren</u>	/	<u>Marikate Murren</u>	<u>2/9/2018</u>
Signature	/	Printed Name	Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: _____

JOB POSITON (AND UNIQUE JOB CODE): _____

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION:

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): _____

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	
Managerial responsibilities in any department	
Supervisory responsibilities in Human Resources or Sales and Marketing	
Responsibilities for alcohol sales, distribution, service, and/or storage	
Access to secure casino back-of-the house areas (including executive offices) without security escort	
Responsibilities for accounting and/or finance relating to the gaming establishment	
“Write” access to gaming-related casino databases	
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	
Other (please set forth other relevant information for exemption consideration)	

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): _____

The undersigned states that the information herein is true and accurate.

Signature / Printed Name Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Sous Chef | 10352

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the responsibility of the Assistant Chef to efficiently assist the Executive Chef and/or Executive Sous Chef with kitchen operation and pre-established food and labor cost controls, while ensuring preparation and service is of the highest possible quality and done in a timely manner. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures including health sanitation and safety policies.

Essential Functions and Tasks

- Communicates effectively with management and co-workers with regard to the operations of the kitchen.
- Maintains operational control of purchasing, receiving, purveyor lists, and inventory of all kitchen items when Executive Chef and/or Executive Sous Chef is not present, including monitoring food cost for outlet and ordering food products.
- Assists in overseeing kitchen-related activities pertaining to the normal operation of the restaurant, menu, and staff, including coordinating service of food.
- Assists with menu creation (including creating new daily specials), recipe development, and enhancing knife skills and teamwork.
- Creates recipes and associated costs for all menu items.
- Oversees product consistency and makes necessary modifications according to business needs.
- Monitors waste and overproduction, as well as utilizes leftovers and ensures proper rotation and quality control.
- Collaborates with others within department and with other Chef's departments to ensure proper ordering and guest assistance.
- Performs various clerical duties regarding staff and kitchen operations including payroll, scheduling and staff files, and vacation planning.
- Maintains the overall cleanliness and equipment maintenance of outlet.
- Assumes responsibilities of the kitchen in the absence of the Executive Chef and/or Executive Sous Chef.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Sous Chef | 10352

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	Monitors and minimizes overtime according to labor and departmental standards. Ensures staff motivation through recognition and engagement. Schedules and staffs for appropriate business levels. Monitors training of new employees to help them achieve higher goals.
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
"Write" access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Head Chef's Assistant; no access to gaming machines

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Sous Chef | 10352

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Spa Attendant | 10170

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-20-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Spa Attendant to greet, receive, monitor, and transport clients using the Spa facilities while ensuring their comfort at all times. This also includes maintaining the Spa facility. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Maintains the spa locker room and wet areas according to department standards, including restocking lockers, folding towels, removing dirty towels/robes from locker room and wet areas, and cleaning sandals.
- Provides guests with a tour of the spa facility.
- Escorts guests to treatment rooms.
- Disposes of soiled linen, folds, and restocks linen as needed.
- Provides beverages and other amenities to guests, such as towels, robes, and locker services.
- Facilitates the guest's arrival and departure for Spa or Salon appointments.
- Prepares guests for spa and salon appointments.
- Empties trashcans and restock refreshments, magazines, and locker room amenities.
- Stocks and requests supplies as needed to service guests.
- Keeps all spa and salon areas clean and supplied with needed amenities (e.g., towels, drinks, paper products, vanity supplies).
- Attends meetings and training sessions as scheduled by department management.
- Responds effectively to guest inquiries related to Spa services, the property and the local area while providing excellent service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Promotes and maintains the highest level of service to all guests, including smiling, greeting, and making eye contact, while staying alert to their needs.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Spa Attendant | 10170

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Spa position for the property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Spa Attendant | 10170

The undersigned states that the information herein is true and accurate.

<u>Marikate Murren</u>	/	<u>Marikate Murren</u>	<u>2/8/2018</u>
Signature	/	Printed Name	Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Spa Receptionist | 11925

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 12-20-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Spa Receptionist to maintain a clean and safe environment for all Spa guests, perform sales of retail items, and schedule and provide information for Spa/Salon services while providing prompt, expert, and courteous service to all guests. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Checks guests in and out of facility.
- Assists guests with scheduling appointments.
- Provides guests with a knowledgeable understanding of Spa/Salon services.
- Greets all guests in a friendly and professional manner and offers upgrades or enhancements to services.
- Answers phones promptly and courteously, books appointments and takes accurate messages when necessary.
- Rings sales on the register, gives correct change and sales receipt, and bags merchandise.
- Follows Payment Card Industry standards.
- Follows cash handling procedures, including counting cash; checking counterfeit currencies, checks, and charges; charging to an expense center; and providing comps.
- Follows opening and/or closing procedures.
- Responds effectively to guest inquiries related to spa/salon services, retail products, the property and the local area while providing excellent service.
- Ensures the privacy and confidentiality of guests and limits requests for information pertaining to guests in accordance with hotel policies.
- Promotes and maintains the highest level of service to all guests, including smiling, greeting, and making eye contact, while staying alert to their needs.

Resolves guest complaints within scope of authority; otherwise refers the matter to management. Notifies supervisor of all unusual events.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Spa Receptionist | 11925

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level Spa position on property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Spa Receptionist | 11925

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): SPECIALIST WORKFORCE MGMT | 16138

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-23-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

The Workforce Management Specialist is responsible for creating and implementing weekly schedules for the property while making appropriate decisions and staffing level changes based on business needs. All duties are to be performed in accordance with department and property policies, practices, and procedures.

POSITION RESPONSIBILITIES/DUTIES:

- Analyzing staffing data provided by department and Finance to ensure appropriate staffing levels
- Adjust staffing needs based on special events, large party reservations, table games/slot tournaments while maintaining compliance with scheduling to include departments covered by collective bargaining agreements
- Ensuring the timeliness of schedule creation and delivery to the standards as set out by the Director/Manager and expectations of the business unit
- Work with department heads to adjust staffing models and approve schedule changes independently as necessary
- Deliver best practice scheduling, rotation design and reporting to maintain consistency among business units
- Actively advise and provide guidance to the business units around scheduling, labor management and leave management
- Determine appropriate times to close stations/tables and call employees into work or grant employees company requested early outs as necessary
- Ensure scheduling practice is developed in line with legislative requirements and local law protecting the company and employee interest
- Ensure ethical and equity issues are identified and managed in the scheduling process
- Analyze the scheduled versus actual labor used across the business to identify trends in business activity
- Develop duty sheets and other daily reporting as required by the business. In particular they will be responsible for developing the allocation sheets for each of the business units
- Approve and process manually received swaps, exceptions and schedule changes which cannot be processed by the portfolio manager
- Staff the customer service inquiry counter during opening hours for staff inquiries
- Other job related duties as requested

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): SPECIALIST WORKFORCE MGMT | 16138

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Staffing & Scheduling Specialist; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

SPECIALIST WORKFORCE MGMT | 16138

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Utility Porter | 17195

JOB DESCRIPTION

EFFECTIVE DATE OF JOB DESCRIPTION: 8-21-2017

(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)

It is the primary responsibility of the Utility Porter to maintain the cleanliness of the kitchen area by cleaning pots, pans, stoves, kitchen equipment and washing dinnerware, flatware, and glassware and properly cleaning and sanitizing kitchen utensils. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures, including standards set by the local health department.

Essential Functions and Tasks

- Maintains the highest standards to ensure the quality and cleanliness in the kitchen area.
- Operates warewashing in accordance to sanitization and safety standards.
- Receives soiled dinnerware, flatware, and glassware, placing items according to size and likeness into warewashing equipment.
- Removes washed dinnerware, flatware, and glassware as needed and stacks them according to size and likeness for future use.
- Stocks china, glass, silver, and miscellaneous kitchenware.
- Utilizes proper cleaning chemicals for designated cleaning and sanitization and uses proper PPE.
- Cleans and sanitizes soiled kitchen utensils, pots, pans and miscellaneous kitchenware.
- Changes and filters grease.
- Returns items not satisfactorily cleaned for a second wash.
- Sweeps and mops kitchen, refrigerator, and freezer floors.
- Scrubs walls, ceilings, trashcans, and all other applicable surfaces to standards set by the Company.
- Handles recyclables and food waste to the standards set by the department.
- Picks up and disposes trash in designated areas.
- Cleans floor mats per department standard.
- Assists with the receiving and disposition of orders from vendors and warehouses, and works with a pallet jack, fork lift, automatic power washer and other cleaning equipment.

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Utility Porter | 17195

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on the gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Entry Level position for the property; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE):

Utility Porter | 17195

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/8/2018

Signature

/ Printed Name

Date

DRAFT



MASSACHUSETTS GAMING COMMISSION

IDENTIFICATION OF POTENTIAL POSITIONS FOR EXEMPTION FROM THE REGISTRATION REQUIREMENT BY THE MGC

The Massachusetts Gaming Commission may exempt a job position from categorization as a gaming service employee. See G.L. c. 6, § 172(o); 205 CMR 134.03(4).

GAMING LICENSEE: Blue Tarp reDevelopment, LLC (dba MGM Springfield)

JOB POSITON (AND UNIQUE JOB CODE): Valet Attendant | 14626

JOB DESCRIPTION	EFFECTIVE DATE OF JOB DESCRIPTION: 8-25-2017
<i>(The Licensee shall immediately notify the Bureau of changes to any job description for an exempted position.)</i>	
It is the responsibility of the Valet Attendant to provide excellent customer service and create a safe and friendly environment for employees and guests while safely parking and retrieving guest vehicles. All duties are to be performed in accordance with federal, state, local laws, regulations, and ordinances, as well as department and Company policies, practices, and procedures.	
<u>POSITION RESPONSIBILITIES/DUTIES:</u>	
<ul style="list-style-type: none">• Warmly greets and assists all guests at the Valet Front Drive areas while providing courteous, efficient, and enthusiastic valet parking services.• Asks all guests if they are checking into the hotel and if they need bell assistance.• Assists Bell Persons with the movement of luggage as necessary.• Opens vehicle doors for guests.• Accommodates guests requiring special assistance and aid.• Inspects vehicles for overall condition and notes any dents, missing parts, or distinguishing features.• Checks and notifies guests of pre-existing damage to their vehicles.• Records guest names and vehicle information, and secures the guest keys for parking, including writing valet employee number on every valet ticket.• Identifies vehicle-designated parking location and provides guests with vehicle claim check.• Parks and retrieves all guests and patrons' cars of all types (standard and manual transmissions) using care and caution at all times, following all departmental rules and regulations as well as driving safety rules.• Reports issues and/or potential problems to Security or immediate Supervisor to avoid traffic congestion and delays at the valet entrance/exit.• Maintains a clean and safe working area by picking up trash, sweeping valet areas, and keeping valet booths clean.• Performs duties of traffic control and monitoring driveway lanes to efficiently park and retrieve guest vehicles and avoid traffic congestion.• Responds to emergency situations when requested.• Promotes and maintains the highest level of customer service to all guests while staying alert to their needs.	

(Continue to Page 2)

GAMING LICENSEE CERTIFICATION

The Commission considers the following non-exhaustive list of factors when determining whether or not to exempt a job position. Please indicate information about each factor for the position that has been identified as potentially eligible for exemption.

JOB POSITON (AND UNIQUE JOB CODE): Valet Attendant | 14626

FACTOR	DESCRIPTION / EXPLANATION
Work performed on gaming floor	No work performed on gaming floor or gaming machines
Managerial responsibilities in any department	None
Supervisory responsibilities in Human Resources or Sales and Marketing	None
Responsibilities for alcohol sales, distribution, service, and/or storage	None
Access to secure casino back-of-the house areas (including executive offices) without security escort	Access Level: N No access to secure casino BOH without security escort
Responsibilities for accounting and/or finance relating to the gaming establishment	None
“Write” access to gaming-related casino databases	None
Responsibilities that potentially impact the integrity of gaming operations, including access to confidential or sensitive information	None
Other (please set forth other relevant information for exemption consideration)	Vehicle Responsibilities Outside of the Casino; no access to gaming equipment

(Continue to Page 3)

JOB POSITON (AND UNIQUE JOB CODE): Valet Attendant | 14626

The undersigned states that the information herein is true and accurate.

Marikate Murren

/ Marikate Murren

2/9/2018

Signature

/ Printed Name

Date

DRAFT

138.10: Jobs Compendium Submission

- (1) The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include a jobs compendium detailing job descriptions, chains of command, and lines of authority for all personnel engaged in the operation of the gaming establishment. The licensee shall maintain and update the jobs compendium on a regular basis.
- (2) A jobs compendium shall include the following sections, in the order listed:
 - (a) An alphabetical table of contents listing the position title and job code for each job description included in 205 CMR 138.10(1) and the page number on which the corresponding job description may be found;
 - (b) A table of organization for each department and division, including all positions, and illustrating by position title, direct and indirect lines of authority within the department or division. Each page of a table of organization shall specify the following:
 1. The date of its submission;
 2. The date of the previously submitted table of organization which it supersedes; and
 3. A unique title or other identifying designation for that table of organization.
 - (c) A description of each employee position which accurately corresponds to the position title as listed in the table of organization and in the alphabetical table of contents. Each position description shall be contained on a separate page, organized by departments or divisions, and shall include, at a minimum, the following:
 1. Position title and corresponding department;
 2. Job duties and responsibilities;
 3. Detailed descriptions of experiential or educational requirements;
 4. Proposed registration or license rank consistent with 205 CMR 134.01 through 134.03;
 5. The date of submission of each employee position job description and the date of any prior job description it supersedes; and
 6. The date of submission and page number of each table of organization on which the employee position title is included.
- (3) A proposed amendment to a previously approved jobs compendium **for any job position requiring licensure or registration**, including any amendment to a table of organization, may be implemented by the gaming licensee without the prior approval of the commission in accordance with 205 CMR 138.02(3), provided that:
 - (a) The amendment is immediately recorded in the jobs compendium maintained by the licensee on its premises; and
 - (b) The amendment is submitted to the commission by the end of the business day on the date of implementation, including at a minimum, the following:
 1. A detailed cover letter listing by department each position title to which modifications have been made, a brief summary of each change, instructions regarding any changes in page numbers and the date of implementation; and
 2. The proposed changes to the information required by 205 CMR 138.10(2), including the corresponding job descriptions and tables of organization, contained on

pages which may be used to substitute for those sections of the jobs compendium previously approved by the commission.

(4) ~~If a~~ gaming licensee ~~wishes to~~ shall not be required to comply with the filing requirements of 205 CMR 138.10(3) for amendments to a job descriptions for any positions which has been exempted from the registration requirements pursuant to 205 CMR 134.03(b), it shall be required to obtain the approval of the commission in advance of implementing such change. The request for approval shall contain, at a minimum, the following: require a gaming service employee registration, provided that the gaming licensee files with the commission a notice of any addition, deletion or amendment to any position that requires gaming service employee registration. Such notice shall include the title, department, job code, salary grade and table of organization on which that position is identified.

- (a) A detailed cover letter listing by department the position title to which modifications are to be made, a brief summary of each change, instructions regarding any changes in page numbers and the date of implementation; and
- (b) The proposed changes to the information required by 205 CMR 138.10(2), including the corresponding job description and tables of organization, contained on pages which may be used to substitute for those sections of the jobs compendium previously approved by the commission.

(5) Notwithstanding any other requirement of 205 CMR, each gaming licensee shall submit a complete and up-to-date jobs compendium in accordance with 205 CMR 138.02 to the commission 18 months after approval of its system of internal controls in accordance with 205 CMR 138.02 and every two years thereafter, unless otherwise directed by the commission.

(6) Each gaming licensee shall maintain on its premises a complete, updated copy, which may be maintained electronically, of its jobs compendium.

(7) No provision of 205 CMR 138.00 shall be construed so as to limit a gaming licensee's discretion in utilizing a particular job title for any position in its jobs compendium.



SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2 relative to the proposed amendment of **205 CMR 138.10: Jobs Compendium Submission**; notice of which was filed with the Secretary of the Commonwealth. This amendment was developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. This amendment will work in conjunction with a new protocol for determining a registration and licensure requirement for employees of gaming establishments. This amendment is largely governed by G.L. c. 23K §§ 4(28), and 5.

This amendment applies solely to licensees and their employees. Therefore, it is unlikely that this amendment will impact any small businesses. In accordance with G.L. c.30A, §2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed amendment:

There are no small businesses that will be impacted by this amendment, as it applies to licensees and their employees only.

2. State the projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation:

There will be no reporting, recordkeeping or administrative costs created by these amendments that do not already exist at this time.

3. State the appropriateness of performance standards versus design standards:

This amendment is intended to address protocol for compliance with the regulation. A performance standard is necessary to describe the intent of this amendment.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:



Massachusetts Gaming Commission

As these amendments are directed at licensees and individuals, it is unlikely that they will deter or encourage the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION
205 CMR 133.00: VOLUNTARY SELF-EXCLUSION

133.04: Duration of Exclusion and Removal from the List

(1) As part of the request for voluntary self-exclusion, the individual must select the duration for which they wish to be voluntarily excluded. An individual may select any of the following time periods as a minimum length of exclusion:

- (a) ~~Six months~~ (RESERVED);
- (b) One year;
- (c) Three years;
- (d) Five years; or
- (e) Lifetime (An individual may only select the lifetime duration if their name has previously appeared on the voluntary self-exclusion list for at least six months.)



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 amendment of **205 CMR 133.04: Duration of Exclusion and Removal from the List**, for which a public hearing was held on February 15th, 2018. The amendment was developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendment updates the voluntary self-exclusion regulations to conform to best practices within the industry and are largely governed by M.G.L. c. 23K, §§ 4(28) and 4(37).

This amendment will apply directly to individuals. Accordingly, the amendment is unlikely to have any effect on small businesses.

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 this amendment pertains solely to individuals, there are no 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 this amendment.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

This amendment addresses individuals’ options for inclusion on a Voluntary Self-Exclusion List, so 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:



Massachusetts Gaming Commission

There are no design or operational standards for small businesses required in the proposed amendment. This amendment is directed solely at individuals.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed amendment does not deter or encourage the formation of new businesses in the Commonwealth, as it addresses options for individuals participating in a program offered by the Commission only.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission

By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission



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 of **205 CMR 141.06: Notice to the Commission of Changes** for which a public hearing was held on February 15th, 2018. These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendments update the surveillance regulations to conform to best practices within the industry and are largely governed by G.L. c. 23K, §§ 4(28), 4(37) and 5(9).

These amendments apply directly to gaming licensees. Accordingly, these amendments are unlikely to have an impact on small businesses.

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 these amendments pertain primarily to licensees of gaming establishments, there are no 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 amendments.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

These amendments address the implementation of gaming establishment surveillance plans, so 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 design or operational standards for small businesses required in the proposed amendments. These amendments are directed solely at the licensee.



Massachusetts Gaming Commission

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed amendment does not deter or encourage the formation of new businesses in the Commonwealth, as it addresses surveillance plans in gaming establishments only.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION
205 CMR 138.00: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES AND
INTERNAL CONTROLS

138.07: Internal Controls A: (Reserved) Floor Plans

(1) A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions for the production and updating of a floor plan for the gaming establishment. Further, provisions shall be included to ensure that no gaming operations occur without an approved floor plan, and that the configuration of the gaming area remains compliant with the approved plan at all times unless amended in accordance with the process outlined by 205 CMR 138.07(2) or (3). The initial floor plan for a gaming establishment resulting from the process described in 205 CMR 138.07 shall be reviewed as part of the 205 CMR 138.02 approval process.

The gaming area depicted in a floor plan shall be arranged in such a manner as to provide optimum security for the gaming operations. A floor plan shall accurately depict the entire layout, including equipment positioning, in the gaming area and support areas; shall be drawn to at least one-eighth inch scale (1/8 inch = one foot); and shall depict, at a minimum, the location of the following:

- (a) The gaming area, and any simulcasting facility, including, at a minimum, the proposed total square footage thereof and a clear delineation of the respective perimeter of each;
- (b) Each gaming pit, its pit location number, and any alternate configurations;
- (c) Each table game, noting its table number;
- (d) Each CCTV camera, noting its type and camera number;
- (e) Each slot booth, noting its booth number,
- (f) Each cashier's cage and its component offices and areas;
- (g) Each window at the cashiers' cage, noting its window number;
- (h) Each count room;
- (i) Each slot zone, its slot zone location letter or number and the total number of authorized slot machine locations within that slot zone, and at the gaming licensee's option, a maximum of four alternate configurations or locations for that slot zone and the alternate slot zone location number for each (for example, Slot Zone 2A);
- (j) Each authorized slot machine or other electronic gaming device location, which location shall contain no more than one slot machine at a time, noting its slot machine location number and any slot zone location letter or number;
- (k) Each automated coupon redemption machine, noting its location number;
- (l) Each automated jackpot payout machine, noting its location number;
- (m) Each gaming voucher redemption machine, noting its location number;
- (n) Each satellite cage and its component offices and areas;
- (o) Each area approved for the storage of gaming chips or plaques;
- (p) Each room or area approved for the storage of dice or playing cards;
- (q) Each other room or area that is accessible directly from the gaming area;
- (r) For those establishments with a simulcasting facility:
 - 1. Each simulcast counter and any ancillary simulcast counter, along with their component offices, areas and equipment,

2. Each credit voucher machine, noting its location number;
3. Each self-service pari-mutuel machine, noting its location number, and
4. Each other area or room designated by the commission.

(2) Temporary amendments to floor plan

- (a) In order to temporarily amend the floor plan approved in accordance with 205 CMR138.07(1) and reconfigure one or more approved table game pit areas or slot machine zones (areas) in the gaming area, a gaming licensee must first seek the Bureau's approval by filing a written request with the Bureau at least 24 hours prior to implementing such reconfiguration. The request shall be accompanied by a certification from the licensee's surveillance department that adequate surveillance coverage will be in place for the temporary reconfiguration. If the gaming licensee does not receive a response from the Bureau within 24 hours of submitting the request, the gaming licensee may proceed with the reconfiguration. (Movement of a slot machine must also be done in accordance with 205 CMR 144.00). The Bureau may deny any request that will result in a violation of any law, regulation, or approved internal control, or may jeopardize the safety and/or security of a patron or the integrity of the gaming operation.
- (b) A reconfigured gaming area, table game pit, or slot machine zone (area) shall not:
 1. Exceed the dimensions approved in the existing approved floor plan for the area unless the request for temporary amendment includes any required approval of the municipal building official. Such approval may be required in instances including, but not limited to, the egress from the gaming floor or area is altered, structural modification is proposed, or the use or occupancy classification for the area is modified;
 2. Result in improper surveillance coverage under the approved surveillance plan.
- (c) Each table game pit shall have an alarm system, approved by the Bureau, which enables an employee of the gaming establishment to transmit a signal that is audibly and visually reproduced in each of the following locations whenever there is an emergency in the pit:
 1. The surveillance monitoring rooms;
 2. The casino security department; and
 3. The on-site Bureau office.
- (d) A temporary reconfiguration may only remain in place for 30 days from approval. Upon request, the Bureau may approve one 30 day extension of the temporary approval. In order for an amendment to the configuration to remain in place for a longer period of time, the amendment process described in 205 CMR 138.07(3) shall be followed.
- (e) All reconfigurations made pursuant to a temporary amendment to an approved floor plan shall be subject to inspection by the Bureau to ensure compliance with all applicable laws and regulations and the gaming licensee's approved system of internal controls.
- (f) The Bureau may approve a request for a temporary amendment to an approved floor plan on less than 24 hours notice in its discretion provided that all pertinent information is provided to its satisfaction.

(3) Amendments to approved floor plan

- (a) A floor plan approved in accordance with 205 CMR138.07(1) may be amended upon request by a gaming licensee and approval by the Bureau. Such request shall be filed with the Bureau in writing at least 72 hours prior to the time for which implementation of the amendment(s) is sought. Such request shall include, at a minimum, the following information as applicable:
1. A depiction of any new configuration to the gaming area, a table game pit, or a slot machine zone (area) in comparison with the existing configuration;
 2. A depiction of any new outer perimeter of the gaming area, table game pit area, or slot machine zone (area) in comparison with the existing perimeter;
 3. A statement of the resulting square footage of the area to be amended in comparison with the existing square footage for the area;
 4. A narrative from a design professional certifying the changes to the floor plan, and/or any necessary approval from the municipal building official.
 5. Identification of any necessary amendments to the gaming licensee's surveillance plan to ensure adequate coverage of the configuration.
- (b) Within 72 hours of receipt of a request to amend a floor plan filed by a gaming licensee, the Bureau, shall review the proposed change set forth in the application to ensure that it will not result in a violation of any law, regulation, or approved internal control, or may jeopardize the safety and/or security of a patron or the integrity of the gaming operation. After review, the Bureau may preliminarily approve the request, deny the request, request further information from the gaming licensee, or request that the licensee's request be modified. The gaming licensee shall not implement any changes until receiving preliminary approval from the Bureau.
- (c) The gaming licensee shall notify the Bureau in writing upon implementing a preliminarily approved amendment to the floor plan. The Bureau shall inspect the physical changes to ensure that they conform to the approved amendment. Following such inspection the Bureau may issue a final approval for the amendment, request that changes be made to conform to the preliminary approval, or request that changes be made to ensure compliance with applicable laws, regulations, or approved internal controls, or to ensure the safety and/or security of a patron or the integrity of the gaming operation.
- (4) An approved copy of the floor plans, and amendments thereto, shall be filed with the Bureau in the gaming establishment, a copy shall be kept on file with the gaming licensee's security office, and with the gaming licensee's monitoring rooms.
- (5) Prior to commencing gaming operations with the amended configuration an updated Table Games Master List shall be filed to ensure compliance with 205 CMR 138.66(3)(a).

138.66: Master Lists of Approved Table Games, Movements of Gaming Equipment: Amendments of Operation Certificates upon Filing Updated Master List

The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions relative to the movements of gaming equipment that incorporate, at a minimum, the following provisions:

- (1) ~~Prior to the issuance of an operation certificate and the commencement of~~ **In order to conduct** gaming or simulcast wagering, each gaming licensee shall file with the IEB office in the gaming establishment comprehensive lists of the table games in its gaming establishment (the Table Games Master List), if any.
- (2) At a minimum, each Table Game Master List shall contain the following information:
 - a. The date on which the list was prepared;
 - b. A description of each table by:
 1. Type of authorized game;
 2. Location number; and
 3. Serial and table number; and
 - c. Such other information as the commission may require.
- (3) Whenever a gaming licensee proposes that gaming tables be brought into, removed from or moved within a gaming establishment, as applicable, the gaming licensee shall first:
 - a. ~~Obtain any amendment to its operation certificate~~ **ensure that the resulting table game configuration will be consistent with the approved floor plan in accordance with 205 CMR 138.07 and that the number of table games is within the authorized number allowed under the operations certificate issued in accordance with 205 CMR 151.01;** and
 - b. Provide an authorized agent of the IEB with written notice at least ~~72~~ **24** hours prior to the actual movement of each gaming table, ~~slot machine and bill changer.~~
- (4) The gaming manager or his or her designee shall notify in writing the accounting department, the security department and the IEB, ~~72~~ **at least 24** hours in advance of all movements and removals of gaming tables. The notification shall include at a minimum:
 - a. The date and time of movement or removal;
 - b. The gaming table(s) or asset number(s) of slot machines, as applicable;
 - c. Whether a movement or removal;
 - d. The location from which gaming table ~~or slot machine~~ will be moved;
 - e. The location to which the gaming table ~~or slot machine~~ will be moved; and
 - f. The signature of a gaming manager or designee.
- (5) Prior to moving or removing a gaming table:
 - a. The table inventory shall be credited from the table; and
 - b. The table drop box shall be removed during a scheduled drop box pick-up and a replacement box not placed on the table.
- (6) Immediately after each gaming table is brought into, removed from or moved within a gaming establishment, the gaming licensee completing the move shall file and serve, in accordance with 205 CMR 138.66(1), updated master lists of its table games to the extent that the move causes a change in the information contained on the most recent version of the applicable list on file with the IEB.
- (7) ~~The number of each type of authorized game included in the gaming licensee's operation certificate or any approved amendments thereto shall be amended, upon the filing of an updated Table Games Master List to conform to the correct number of each type of authorized game that is specified in the applicable list.~~

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205 CMR: MASSACHUSETTS GAMING COMMISSION
205 CMR 151.00: REQUIREMENTS FOR THE OPERATIONS AND CONDUCT OF
GAMING AT A GAMING ESTABLISHMENT

151.01: Issuance and Posting of Operation Certificate

(2) The Operation Certificate shall be conspicuously posted within the gaming establishment and shall state the **maximum** number of gaming positions by type, *i.e.*, slot machines, electronic gaming devices, table games or such other forms of gaming positions approved by the commission.

151.02: Floor Plan

(1) Prior to the issuance ~~or amendment~~ of an Operation Certificate and the commencement of gaming or simulcast wagering, a gaming licensee shall obtain ~~commission~~ approval for the floor plans of its gaming area, simulcasting area (if any), and any restricted areas **as provided in 205 CMR 138.07: Floor Plans**. The gaming establishment shall be arranged in such a manner as to provide optimum security for the gaming establishment operations.

(2) Each floor plan required by 205 CMR 151.02(1) shall accurately depict the entire layout, including equipment positioning, in the gaming area and support areas; shall be drawn to at least one-eighth inch scale (1/8 inch = one foot); and shall depict, at a minimum, the location of the following:

- (s) The gaming area, and any simulcasting facility, including, at a minimum, the proposed total square footage thereof and a clear delineation of the respective perimeter of each;
- (t) Each gaming pit, its pit location number, and any alternate configurations;
- (u) Each table game, noting its pit and table game location number;
- (v) Each CCTV camera, noting its type and camera number;
- (w) Each slot booth, noting its booth number;
- (x) Each cashier's cage and its component offices and areas;
- (y) Each separate master coin bank;
- (z) Each window at the cashiers' cage, noting its window number;
- (aa) Each count room;
- (bb) Each slot zone, its slot zone location letter or number and the total number of authorized slot machine locations within that slot zone, and at the gaming licensee's option, a maximum of four alternate configurations or locations for that slot zone and the alternate slot zone location number for each (for example, Slot Zone 2A);
- (cc) Each authorized slot machine or other gaming device location, which location shall contain no more than one slot machine and bill changer at a time, noting its slot machine location number and any slot zone location letter or number;
- (dd) Each slot stool authorized for use, if any;
- (ee) Each automated coupon redemption machine, noting its location number;
- (ff) Each automated jackpot payout machine, noting its location number;
- (gg) Each gaming voucher redemption machine, noting its location number;
- (hh) Each satellite cage and its component offices and areas;
- (ii) Each coin vault;

- (jj) Each area approved for the storage of gaming chips or plaques;
- (kk) Each room or area approved for the storage of dice or playing cards;
- (ll) Each other room or area that is accessible directly from the gaming area;
- (mm) For those establishments with a simulcasting facility:
 5. Each simuleast counter and any ancillary simuleast counter, along with their component offices, areas and equipment;
 6. Each credit voucher machine, noting its location number;
 7. Each self-service pari-mutuel machine, noting its location number, and
 8. Each other area or room designated by the commission.

(3) A gaming licensee, after obtaining the commission's approval of its floor plans submitted in accordance with 205 CMR 151.02, shall not commence gaming or simulcast wagering in the areas depicted on the floor plan until an Operation Certificate has been issued, and a copy of the floor plans has been delivered to the commission's IEB office in the establishment, an electronic copy has been sent to the IEB's main office, and a printed copy thereof has been delivered to each of the following:

- (a) The gaming licensee's security podium; and
- (b) The gaming licensee's monitoring rooms.

151.05: Operation Certificate: Amendment to Conform to Approved Changes

(1) Prior to making a change to any approved component of its gaming establishment, a gaming licensee shall petition the commission to amend the Operation Certificate. The application shall include, without limitation, the following:

- (a) If applicable, a description of any proposed changes in the number of authorized gaming positions, by category, to be played in the gaming establishment;
- (b) If applicable, a revised floor plan of the gaming establishment, simulcasting area, or any restricted area reflecting the proposed change, which revised floor plan shall be filed with the commission at the office of its Senior Supervising Agent in the establishment. Such petition shall also include the following information:
 1. a comparison showing the presently authorized square footage of the gaming area, simulcasting area, or restricted area to be amended with that which will result if the proposed change is made;
 2. A clear delineation of any proposed change to the perimeter of the gaming area, simulcasting area, or restricted area;
 3. A narrative from the architect certifying the floor plan that clearly describes the change to be made by the proposal, noting with particularity any such change to the perimeter of the gaming area, simulcasting area, or restricted area; and
 4. A description of any alternate gaming pit or slot zone configurations of locations. Prior to any change to and offering to the public of an approved alternate configuration or location:
 - a. The gaming licensee shall provide the Senior Supervising Agent with at least 24 hours prior written notice of the change; and

- b. A physical and CCTV inspection of the alternate configuration or location shall be performed and approved by the commission, or its designee.
- (2) Within three business days of a gaming licensee filing an application pursuant to 205 CMR 151.05(1), the commission, or its designee, shall review the proposed change set forth in the application for compliance with M.G.L. c. 23K and 205 CMR. Unless the commission, or its designee, notifies the gaming licensee in writing that the proposed change is to be scheduled for a full hearing by the commission at a public meeting or is disapproved, the gaming licensee, after obtaining all approvals required by federal, state or local government officials and providing a copy or other acceptable written evidence of such approvals to the commission, may begin implementing such change upon the earlier of the following:
- (a) The expiration of the three-day period; or
 - (b) Receipt of written commission approval for the change.
- (3) The gaming licensee shall notify the commission in writing upon final completion of any proposed change set forth in the application and for which the gaming licensee is prepared to seek final approval pursuant to 205 CMR 151.05(4). A floor plan in the form prescribed by 205 CMR 151.02(2) that depicts the changes made shall accompany the notice.
- (4) Promptly after the filing of a notice pursuant to 205 CMR 151.05(3), the commission or its designee shall inspect the physical changes made to the gaming establishment, simulcasting facility and/or any restricted area to ensure that those changes conform to the floor plan accompanying the notice and the description previously submitted to the commission. Following such inspection, the commission, or its designee, shall notify the gaming licensee in writing as to which physical change is approved and which is rejected, whereupon, in the event any change is rejected, the gaming licensee shall either:
- (a) Correct any rejected change to conform with the approved floor plan;
 - (b) Submit a new application for the proposed change; or
 - (c) Take such other action as the commission, or its designee, may direct to ensure that the currently approved floor plan accurately depicts the physical layout of the gaming establishment, the simulcasting area (if any) and/or any restricted area.
- (5) The Operation Certificate shall be amended to conform to each change approved in accordance with 205 CMR 151.05(4).

151.06: Temporary Amendments for Pit and Slot Zone Configurations or Reconstitutions

- (1) A gaming licensee may temporarily reconfigure one or more pits or slot zones by filing a notice with the commission at the IEB office in the gaming establishment to temporarily reconfigure for each specific pit or slot zone, which notice shall be filed at least 24 hours prior to implementing such alternate configuration. If the gaming licensee does not receive a response to the petition within that 24 hour period, the gaming licensee may proceed with the reconfiguration or reconstitution.
- (2) A reconfigured pit shall not:
- (a) Exceed the dimensions approved for the pit that existed immediately prior to the reconfiguration; nor
 - (b) Include any change requiring the approval of a building official without having first obtained that approval and the approval of the commission.

~~(3) Each pit operating under an approved configuration shall have an alarm system, approved by the commission, which enables a pit clerk or a pit supervisor to transmit a signal that is audibly and visually reproduced in each of the following locations whenever there is an emergency in the pit:~~

- ~~(a) The surveillance monitoring rooms; and~~
- ~~(b) The casino security department.~~

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205 CMR: MASSACHUSETTS GAMING COMMISSION 205 CMR 138.00: UNIFORM
STANDARDS OF ACCOUNTING PROCEDURES AND INTERNAL CONTROLS

138.07: ~~Internal Controls A: (Reserved)~~ Floor Plans

PPC Comment: Does the “Floor Plan” relate to the structure of the facility or just the footprint of the games on the Slot layout? Can you clarify “Floor Plan”.

- (1) A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions for the production and updating of a floor plan for the gaming establishment. Further, provisions shall be included to ensure that no gaming operations occur without an approved floor plan, and that the configuration of the gaming area remains compliant with the approved plan at all times unless amended in accordance with the process outlined by 205 CMR 138.07(2) or (3). The initial floor plan for a gaming establishment resulting from the process described in 205 CMR 138.07 shall be reviewed as part of the 205 CMR 138.02 approval process.

The gaming area depicted in a floor plan shall be arranged in such a manner as to provide optimum security for the gaming operations. PPC Comment: Can the MGC clarify/define “optimum security”? A floor plan shall accurately depict the entire layout, including equipment positioning, in the gaming area and support areas PPC Comment: Can the MGC define “support areas”? ; shall be drawn to at least one-eighth inch scale (1/8 inch = one foot) PPC Comment: PPC currently prints to fit a large E-sized paper to ensure legibility, would this be an issue? ; and shall depict, at a minimum, the location of the following:

- (a) The gaming area, and any simulcasting facility, including, at a minimum, the proposed total square footage thereof and a clear delineation of the respective perimeter of each;
- (b) Each gaming pit, its pit location number, and any alternate configurations;
- (c) Each table game, noting its table number;
- (d) Each CCTV camera, noting its type and camera number;
- (e) Each slot booth, noting its booth number, PPC Comment: Can the MGC define “slot booth”?
- (f) Each cashier's cage and its component offices and areas; PPC Comment: Can the MGC clarify/define ‘component offices and areas’?
- (g) Each window at the cashiers' cage, noting its window number;
- (h) Each count room;
- (i) Each slot zone, its slot zone location letter or number and the total number of authorized slot machine locations within that slot zone, and at the gaming licensee's option, a maximum of four alternate configurations or locations for that slot zone and the alternate slot zone location number for each (for example, Slot Zone 2A); PPC Comment: “a maximum of four alternate configurations or locations for that slot zone and the alternate slot zone location number for each (for example, Slot Zone 2A)” – Can the MGC clarify, we do not understand the intent of this requirement?

- (j) Each authorized slot machine or other electronic gaming device location, which location shall contain no more than one slot machine at a time, noting its slot machine location number and any slot zone location letter or number; PPC Comment: noting slot machine location number, slot zone location letter or number on at each authorized slot machine or EGD device location on the drawings is not practical. If PPC adds all of this data, the printed drawings would not be legible. Our current drawings show position number at each authorized slot machine or EGD device location.
- (k) Each automated coupon redemption machine, noting its location number; PPC Comment: Can the MGC clarify/define “coupon redemption machine” versus “voucher redemption machine” noted in (m) below?
- (l) Each automated jackpot payout machine, noting its location number;
- (m) Each gaming voucher redemption machine, noting its location number;
- (n) Each satellite cage and its component offices and areas;
- (o) Each area approved for the storage of gaming chips or plaques;
- (p) Each room or area approved for the storage of dice or playing cards;
- (q) Each other room or area that is accessible directly from the gaming area; PPC Comment: Please clarify “other room or area”. Does this mean F&B, Retail, Bathrooms, etc?
- (r) For those establishments with a simulcasting facility:
 1. Each simulcast counter and any ancillary simulcast counter, along with their component offices, areas and equipment,
 2. Each credit voucher machine, noting its location number;
 3. Each self-service pari-mutuel machine, noting its location number, and
 4. Each other area or room designated by the commission.

(2) Temporary amendments to floor plan PPC Comment: What is floor plan here? Physical floor plan or footprint of gaming devices?

- (a) In order to temporarily amend the floor plan approved in accordance with 205 CMR138.07(1) and reconfigure one or more approved table game pit areas or slot machine zones (areas) in the gaming area, a gaming licensee must first seek the Bureau’s approval by filing a written request with the Bureau at least 24 hours prior to implementing such reconfiguration. The request shall be accompanied by a certification from the licensee’s surveillance department that adequate surveillance coverage will be in place for the temporary reconfiguration. PPC Comment: How can surveillance certify prior to the temporary amendment being done? Surveillance would not be able to ensure/test ‘adequate surveillance coverage’ until the amendment is complete. After completion of an amendment, Surveillance could determine coverage and make adjustments deemed necessary. If the gaming licensee does not receive a response from the Bureau within 24 hours of submitting the request, the gaming licensee may proceed with the reconfiguration. (Movement of a slot machine must also be done in accordance with 205 CMR 144.00). The Bureau may deny any request that will result in a violation of any law, regulation, or approved internal control, or may jeopardize the safety and/or security of a patron or the integrity of the gaming operation.
- (b) A reconfigured gaming area, table game pit, or slot machine zone (area) shall not:

1. Exceed the dimensions approved in the existing approved floor plan for the area unless the request for temporary amendment includes any required approval of the municipal building official. Such approval may be required in instances including, but not limited to, the egress from the gaming floor or area is altered, structural modification is proposed, or the use or occupancy classification for the area is modified;
 2. Result in improper surveillance coverage under the approved surveillance plan.
- (c) Each table game pit shall have an alarm system, approved by the Bureau, which enables an employee of the gaming establishment to transmit a signal that is audibly and visually reproduced in each of the following locations whenever there is an emergency in the pit:
1. The surveillance monitoring rooms;
 2. The casino security department; and
 3. The on-site Bureau office.
- (d) A temporary reconfiguration may only remain in place for 30 days from approval. Upon request, the Bureau may approve one 30 day extension of the temporary approval. In order for an amendment to the configuration to remain in place for a longer period of time, the amendment process described in 205 CMR 138.07(3) shall be followed.
- (e) All reconfigurations made pursuant to a temporary amendment to an approved floor plan shall be subject to inspection by the Bureau to ensure compliance with all applicable laws and regulations and the gaming licensee's approved system of internal controls.
- (f) The Bureau may approve a request for a temporary amendment to an approved floor plan on less than 24 hours notice in its discretion provided that all pertinent information is provided to its satisfaction.

(3) Amendments to approved floor plan PPC Comment: What is floor plan here? Physical floor plan or footprint of gaming devices?

- (a) A floor plan approved in accordance with 205 CMR138.07(1) may be amended upon request by a gaming licensee and approval by the Bureau. Such request shall be filed with the Bureau in writing at least 72 hours prior to the time for which implementation of the amendment(s) is sought. Such request shall include, at a minimum, the following information as applicable:
1. A depiction of any new configuration to the gaming area, a table game pit, or a slot machine zone (area) in comparison with the existing configuration;
 2. A depiction of any new outer perimeter of the gaming area, table game pit area, or slot machine zone (area) in comparison with the existing perimeter;
 3. A statement of the resulting square footage of the area to be amended in comparison with the existing square footage for the area;
 4. A narrative from a design professional certifying the changes to the floor plan, and/or any necessary approval from the municipal building official.
 5. Identification of any necessary amendments to the gaming licensee's surveillance plan to ensure adequate coverage of the configuration.
- (b) Within 72 hours of receipt of a request to amend a floor plan filed by a gaming licensee, the Bureau, shall review the proposed change set forth in the application to ensure that it will not result in a violation of any law, regulation, or approved internal control, or may jeopardize the safety and/or security of a patron or the integrity of the gaming operation.

After review, the Bureau may preliminarily approve the request, deny the request, request further information from the gaming licensee, or request that the licensee's request be modified. The gaming licensee shall not implement any changes until receiving preliminary approval from the Bureau.

- (c) The gaming licensee shall notify the Bureau in writing upon implementing a preliminarily approved amendment to the floor plan. The Bureau shall inspect the physical changes to ensure that they conform to the approved amendment. Following such inspection the Bureau may issue a final approval for the amendment, request that changes be made to conform to the preliminary approval, or request that changes be made to ensure compliance with applicable laws, regulations, or approved internal controls, or to ensure the safety and/or security of a patron or the integrity of the gaming operation.
- (4) An approved copy of the floor plans, and amendments thereto, shall be filed with the Bureau in the gaming establishment, a copy shall be kept on file with the gaming licensee's security office, and with the gaming licensee's monitoring rooms.
- (5) Prior to commencing gaming operations with the amended configuration an updated Table Games Master List shall be filed to ensure compliance with 205 CMR 138.66(3)(a).

138.66: Master Lists of Approved Table Games, Movements of Gaming Equipment: Amendments of Operation Certificates upon Filing Updated Master List

The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions relative to the movements of gaming equipment that incorporate, at a minimum, the following provisions:

- (1) ~~Prior to the issuance of an operation certificate and the commencement of~~ **In order to conduct** gaming or simulcast wagering, each gaming licensee shall file with the IEB office in the gaming establishment comprehensive lists of the table games in its gaming establishment (the Table Games Master List), if any.
- (2) At a minimum, each Table Game Master List shall contain the following information:
 - a. The date on which the list was prepared;
 - b. A description of each table by:
 1. Type of authorized game;
 2. Location number; and
 3. Serial and table number; and
 - c. Such other information as the commission may require.
- (3) Whenever a gaming licensee proposes that gaming tables be brought into, removed from or moved within a gaming establishment, as applicable, the gaming licensee shall first:
 - a. ~~Obtain any amendment to its operation certificate~~ **ensure that the resulting table game configuration will be consistent with the approved floor plan in accordance with 205 CMR 138.07 and that the number of table games is within the authorized number allowed under the operations certificate issued in accordance with 205 CMR 151.01; and**

- b. Provide an authorized agent of the IEB with written notice at least ~~72~~ 24 hours prior to the actual movement of each gaming table, ~~slot machine and bill changer~~.
- (4) The gaming manager or his or her designee shall notify in writing the accounting department, the security department and the IEB, ~~72~~ at least 24 hours in advance of all movements and removals of gaming tables. The notification shall include at a minimum:
- a. The date and time of movement or removal;
 - b. The gaming table(s) or asset number(s) of slot machines, as applicable;
 - c. Whether a movement or removal;
 - d. The location from which gaming table ~~or slot machine~~ will be moved;
 - e. The location to which the gaming table ~~or slot machine~~ will be moved; and
 - f. The signature of a gaming manager or designee.
- (5) Prior to moving or removing a gaming table:
- a. The table inventory shall be credited from the table; and
 - b. The table drop box shall be removed during a scheduled drop box pick-up and a replacement box not placed on the table.
- (6) Immediately after each gaming table is brought into, removed from or moved within a gaming establishment, the gaming licensee completing the move shall file and serve, in accordance with 205 CMR 138.66(1), updated master lists of its table games to the extent that the move causes a change in the information contained on the most recent version of the applicable list on file with the IEB.
- (7) ~~The number of each type of authorized game included in the gaming licensee's operation certificate or any approved amendments thereto shall be amended, upon the filing of an updated Table Games Master List to conform to the correct number of each type of authorized game that is specified in the applicable list.~~

205 CMR: MASSACHUSETTS GAMING COMMISSION 205 CMR 151.00:
REQUIREMENTS FOR THE OPERATIONS AND CONDUCT OF GAMING AT A GAMING
ESTABLISHMENT

151.01: Issuance and Posting of Operation Certificate

(2) The Operation Certificate shall be conspicuously posted within the gaming establishment and shall state the **maximum** number of gaming positions by type, *i.e.*, slot machines, electronic gaming devices, table games or such other forms of gaming positions approved by the commission. **PPC Comment: Please clarify this requirement. PPC's gaming floor, type of games is ever changing.**

151.02: Floor Plan

(1) ~~Prior to the issuance or amendment of an Operation Certificate and the commencement of gaming or simulcast wagering, a gaming licensee shall obtain commission approval for the floor plans of its gaming area, simulcasting area (if any), and any restricted areas as provided in 205 CMR 138.07: Floor Plans.~~ **PPC Comment: We are unsure if this applies to PPC since we are operational.** ~~The gaming establishment shall be arranged in such a manner as to provide optimum security for the gaming establishment operations.~~

(2) ~~Each floor plan required by 205 CMR 151.02(1) shall accurately depict the entire layout, including equipment positioning, in the gaming area and support areas; shall be drawn to at least one eighth inch scale (1/8 inch = one foot); and shall depict, at a minimum, the location of the following:~~

- ~~(s) The gaming area, and any simulcasting facility, including, at a minimum, the proposed total square footage thereof and a clear delineation of the respective perimeter of each;~~
- ~~(t) Each gaming pit, its pit location number, and any alternate configurations;~~
- ~~(u) Each table game, noting its pit and table game location number;~~
- ~~(v) Each CCTV camera, noting its type and camera number;~~
- ~~(w) Each slot booth, noting its booth number;~~
- ~~(x) Each cashier's cage and its component offices and areas;~~
- ~~(y) Each separate master coin bank;~~
- ~~(z) Each window at the cashiers' cage, noting its window number;~~
- ~~(aa) Each count room;~~
- ~~(bb) Each slot zone, its slot zone location letter or number and the total number of authorized slot machine locations within that slot zone, and at the gaming licensee's option, a maximum of four alternate configurations or locations for that slot zone and the alternate slot zone location number for each (for example, Slot Zone 2A);~~
- ~~(cc) Each authorized slot machine or other gaming device location, which location shall contain no more than one slot machine and bill changer at a time, noting its slot machine location number and any slot zone location letter or number;~~

- (dd) Each slot stool authorized for use, if any;
- (ee) Each automated coupon redemption machine, noting its location number;
- (ff) Each automated jackpot payout machine, noting its location number;
- (gg) Each gaming voucher redemption machine, noting its location number;
- (hh) Each satellite cage and its component offices and areas; (ii) Each coin vault;
- (jj) Each area approved for the storage of gaming chips or plaques;
- (kk) Each room or area approved for the storage of dice or playing cards; (ll) Each other room or area that is accessible directly from the gaming area; (mm) ——— For those establishments with a simulcasting facility:
 - 5. Each simuleast counter and any ancillary simuleast counter, along with their component offices, areas and equipment;
 - 6. Each credit voucher machine, noting its location number;
 - 7. Each self-service pari-mutuel machine, noting its location number, and
 - 8. Each other area or room designated by the commission.

(3) A gaming licensee, after obtaining the commission's approval of its floor plans submitted in accordance with 205 CMR 151.02, shall not commence gaming or simuleast wagering in the areas depicted on the floor plan until an Operation Certificate has been issued, and a copy of the floor plans has been delivered to the commission's IEB office in the establishment, an electronic copy has been sent to the IEB's main office, and a printed copy thereof has been delivered to each of the following:

- (a) The gaming licensee's security podium; and (b) The gaming licensee's monitoring rooms.

151.05: Operation Certificate: Amendment to Conform to Approved Changes

(1) Prior to making a change to any approved component of its gaming establishment, a gaming licensee shall petition the commission to amend the Operation Certificate. The application shall include, without limitation, the following:

- (a) If applicable, a description of any proposed changes in the number of authorized gaming positions, by category, to be played in the gaming establishment;
- (b) If applicable, a revised floor plan of the gaming establishment, simulcasting area, or any restricted area reflecting the proposed change, which revised floor plan shall be filed with the commission at the office of its Senior Supervising Agent in the establishment.

Such petition shall also include the following information:

- 1. a comparison showing the presently authorized square footage of the gaming area, simulcasting area, or restricted area to be amended with that which will result if the proposed change is made;
- 2. A clear delineation of any proposed change to the perimeter of the gaming area, simulcasting area, or restricted area;

3. A narrative from the architect certifying the floor plan that clearly describes the change to be made by the proposal, noting with particularity any such change to the perimeter of the gaming area, simulcasting area, or restricted area; and
 4. A description of any alternate gaming pit or slot zone configurations of locations. Prior to any change to and offering to the public of an approved alternate configuration or location:
 - a. The gaming licensee shall provide the Senior Supervising Agent with at least 24 hours prior written notice of the change; and
 - b. A physical and CCTV inspection of the alternate configuration or location shall be performed and approved by the commission, or its designee.
- (2) Within three business days of a gaming licensee filing an application pursuant to 205 CMR 151.05(1), the commission, or its designee, shall review the proposed change set forth in the application for compliance with M.G.L. c. 23K and 205 CMR. Unless the commission, or its designee, notifies the gaming licensee in writing that the proposed change is to be scheduled for a full hearing by the commission at a public meeting or is disapproved, the gaming licensee, after obtaining all approvals required by federal, state or local government officials and providing a copy or other acceptable written evidence of such approvals to the commission, may begin implementing such change upon the earlier of the following:
- (a) The expiration of the three-day period; or
 - (b) Receipt of written commission approval for the change.
- (3) The gaming licensee shall notify the commission in writing upon final completion of any proposed change set forth in the application and for which the gaming licensee is prepared to seek final approval pursuant to 205 CMR 151.05(4). A floor plan in the form prescribed by 205 CMR 151.02(2) that depicts the changes made shall accompany the notice.
- (4) Promptly after the filing of a notice pursuant to 205 CMR 151.05(3), the commission or its designee shall inspect the physical changes made to the gaming establishment, simulcasting facility and/or any restricted area to ensure that those changes conform to the floor plan accompanying the notice and the description previously submitted to the commission. Following such inspection, the commission, or its designee, shall notify the gaming licensee in writing as to which physical change is approved and which is rejected, whereupon, in the event any change is rejected, the gaming licensee shall either:
- (a) Correct any rejected change to conform with the approved floor plan;
 - (b) Submit a new application for the proposed change; or
 - (c) Take such other action as the commission, or its designee, may direct to ensure that the currently approved floor plan accurately depicts the physical layout of the gaming establishment, the simulcasting area (if any) and/or any restricted area.
- (5) The Operation Certificate shall be amended to conform to each change approved in accordance with 205 CMR 151.05(4).

151.06: Temporary Amendments for Pit and Slot Zone Configurations or Reconstitutions

- (1) ~~A gaming licensee may temporarily reconfigure one or more pits or slot zones by filing a notice with the commission at the IEB office in the gaming establishment to temporarily reconfigure for each specific pit or slot zone, which notice shall be filed at least 24 hours prior to implementing such alternate configuration. If the gaming licensee does not receive a response to the petition within that 24 hour period, the gaming licensee may proceed with the reconfiguration or reconstitution.~~
- (2) ~~A reconfigured pit shall not:~~
- ~~(a) Exceed the dimensions approved for the pit that existed immediately prior to the reconfiguration; nor~~
 - ~~(b) Include any change requiring the approval of a building official without having first obtained that approval and the approval of the commission.~~
- (3) ~~Each pit operating under an approved configuration shall have an alarm system, approved by the commission, which enables a pit clerk or a pit supervisor to transmit a signal that is audibly and visually reproduced in each of the following locations whenever there is an emergency in the pit:~~
- ~~(a) The surveillance monitoring rooms; and (b) The casino security department.~~



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 of **205 CMR 138.07, 138.66, 151.01**, for which a public hearing was held on February 15th, 2018. These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. These amendments serve to update and clarify the process by which a gaming licensee may amend the floor plan for its gaming area on a temporary or regular basis and are largely governed by G.L. c. 23K §§ 4(28), 5, and 25(c).

These amendments will apply exclusively to gaming licensees. Accordingly, the amendments are unlikely to have any effect on small businesses.

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 these amendments pertain primarily to licensees of gaming establishments, there are no 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 amendments.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

These amendments address the implementation of gaming establishment floor plans, so 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:



Massachusetts Gaming Commission

There are no design or operational standards for small businesses required in the proposed amendments. These amendments are directed solely at the licensee.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed amendment does not deter or encourage the formation of new businesses in the Commonwealth, as it addresses floor plans in gaming establishments only.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION
205 CMR 138: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES AND
INTERNAL CONTROLS

138.20: Possession of Firearms

(1) The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include a policy prohibiting any person from possessing a firearm within or upon the premises of a gaming establishment. If the gaming licensee learns that an individual possesses a firearm within or upon the premises of a gaming establishment, the gaming licensee must immediately notify an official within the on-site office of the IEB and the individual violating the policy shall be removed from the premises of the gaming establishment by officers assigned to the Gaming Enforcement Unit. Thereafter, the gaming licensee shall promptly, and in any event no later than 48 hours of such removal, or violation of the policy, notify the Chief of the Gaming Enforcement Division of the Massachusetts Attorney General's Office.

(2) Notwithstanding 205 CMR 138.20(1), the following individuals may, in the course of their official duties, possess a firearm within or upon the premises of a gaming establishment:

- (a) A member of the Massachusetts State Police assigned to the Gaming Enforcement Unit;
- (b) A law enforcement officer of the host community police department assigned to work at the gaming establishment pursuant to the memorandum of agreement required to be executed in accordance with M.G.L. c. 23K, § 6(f);
- (c) An official who is specifically authorized to do so by the commission or the IEB; and
- (d) A federal law enforcement officer.

(3) Any law enforcement officer in possession of a firearm, other than a member of the Massachusetts State Police assigned to the Gaming Enforcement Unit, shall provide notification to an official within the on-site office of the State Police Gaming Enforcement Unit at the gaming establishment prior to arrival or upon arrival at the gaming establishment. This notification shall be documented with the onsite office of the State Police Gaming Enforcement Unit.

(4) The gaming licensee shall post in a conspicuous location at each entrance to the gaming establishment a legible sign that states:

“No firearms are allowed within or upon the premises of this gaming establishment. This prohibition extends to all areas of this facility: public, non-public, restricted and non-restricted areas. Persons violating this restriction will be removed from the premises and subject to further investigation and if appropriate, prosecution. If you have any questions about this prohibition, please request to see an official from the Massachusetts Gaming Commission Office before proceeding.

Certain law enforcement officers may be exempt from this prohibition; however they must notify the Massachusetts State Police of their presence by either visiting the Massachusetts State Police Gaming Enforcement Unit Office on site or by calling the State Police Gaming Enforcement Unit at 617-533-9765 [number to be provided by the IEB].”



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 amendment of **205 CMR 138.20: Possession of Firearms**, for which a public hearing was held on February 15th, 2018. The amendment was developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendment updates the firearms possession regulations to conform to best practices within the industry and are largely governed by M.G.L. c. 23K, §§ 4(28), 4(37) and 6(b).

This amendment will apply exclusively to gaming licensees. Accordingly, the amendment is unlikely to have any effect on small businesses.

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 this amendment pertains solely to licensees of gaming establishments, there are no 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 this amendment.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

This amendment addresses the language incorporated in required signage at gaming establishments, so 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 design or operational standards for small businesses required in the proposed amendment. This amendment is directed solely at the licensee.



Massachusetts Gaming Commission

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed amendment does not deter or encourage the formation of new businesses in the Commonwealth, as it addresses signage requirements in gaming establishments only.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal

Dated: _____



Massachusetts Gaming Commission

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 138: UNIFORM STANDARDS OF ACCOUNTING PROCEDURES
AND INTERNAL CONTROLS

138.28: Gaming Day

A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall specify ~~what~~ the hours of operation for the gaming establishment and ~~what the~~ incorporate a 'gaming day' ~~will be~~ for accounting purposes **that begins at 6:00:00 a.m. and ends the following day at 5:59:59 a.m.** Each gaming licensee may establish a gaming day for slot machines which is different from its gaming day for table games; provided, however, that ~~no gaming day shall be longer than 24 hours.~~

138.33: Removal of Slot Drop Containers: Unsecured Currency Funds; Recording of Meter Readings for Slot Machine Drop

A system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include procedures and protocols relative to the removal of slot drop containers, unsecured currency, and the recording of meter readings for slot machine drop that, at a minimum, incorporates the following requirements:

(7) Whenever currency, a gaming voucher, or a coupon is found inside a ~~bill-changer slot machine~~ but outside of the slot ~~cash-storage drop box (unsecured drop)~~ during the collection of slot ~~cash-storage drop~~ boxes **it shall be deemed "unsecured funds."** When unsecured funds are located, a count team member and a member of the casino security department shall complete and sign an **unsecured funds** form which includes the asset number in which the unsecured ~~drop-funds~~ **was were** found, the date the unsecured ~~drop-funds~~ **was were** found, and the total value of the unsecured ~~drop-funds~~. The unsecured ~~drop-funds~~ and the original **unsecured funds** form shall be transported to the ~~count room~~ **cashier's cage**. A determination shall be made as to whether the unsecured funds registered on the coin-in meter of the slot machine from which they were retrieved. If the unsecured funds registered on the coin-in meter of the slot machine, the funds shall be recorded as part of the gross gaming revenue for the slot machine and ~~counted and~~ recorded with the contents removed from the corresponding slot ~~cash-storage drop~~ box. If it is determined that the unsecured funds did not register on the coin-in meter of the slot machine, the funds shall be processed as unclaimed cash in accordance with 205 CMR 138.68(1)(b). ~~If after a count of the contents of a slot drop box it is determined that the total value of currency, gaming vouchers, and coupons is greater than the corresponding value indicated on the coin-in meter for the subject slot machine, the excess value shall be considered unsecured funds and the value shall be reflected on an unsecured funds form and processed as unclaimed cash in accordance with 205 CMR 138.68(1)(b).~~

The duplicate of the **unsecured funds** form shall be placed in a locked accounting box. Upon completion of the count, the original **unsecured funds** form **relative to funds that registered on the coin-in meter** shall be placed in a locked accounting box located in the count room. The accounting department ~~will~~ **shall** retrieve the original form and reconcile it to the duplicate. **A copy of the form shall be provided to the IEB.**

(8) Whenever ~~unsecured drop funds is~~ **are** found **inside a slot machine but outside of the slot drop box** at times other than the collection of slot ~~cash storage~~ **drop** boxes, a slot department member shall notify the surveillance department and complete and sign the **unsecured funds** form referenced in 205 CMR 138.33(7). The ~~unsecured drop funds~~ and the original form shall be transported by the slot department member, escorted by a security department member, to the cashiers' cage where a cashier shall sign the form **acknowledging receipt**. The ~~unsecured drop funds~~ and original ~~form~~ shall be ~~retained by the cashier, and the slot department member shall place the duplicate form in a locked accounting box. The accounting department shall reconcile the original form to the duplicate.~~ **handled in accordance with the process described in 205 CMR 138.33(7).**

(9) Upon receipt of an unsecured gaming voucher or coupon, the cage cashier in the presence of the slot department member shall deface **or otherwise deactivate** the gaming voucher or coupon, to the extent necessary, so as to prevent subsequent redemption.

(10) At the end of the gaming day, at a minimum, the original ~~unsecured drop funds~~ forms and as applicable, gaming vouchers and coupons, shall be forwarded to the accounting department. The accounting department shall reconcile the original and duplicate forms and record the appropriate amount on the Slot Win Report **or unclaimed cash report, as applicable. Reconciliation of unsecured funds shall be completed by the end of the gaming day on which the count of the slot machine drop for the machine in which the unsecured funds were located is performed.**

(11) In conjunction with the removal of any slot drop ~~container~~ **box**, a gaming licensee shall manually read, or cause an approved slot monitoring system to record, **the slot machine's accounting meters that are used to calculate gross gaming revenue, as described by GLI-11, 5.4.1 Electronic Accounting and Occurrence Meters, including** the in-meter, drop meter, out-meter, attendant paid jackpots meter, attendant paid cancelled credits meter, bill meters and handle pull meter. In addition, the following meters shall be read and recorded:

- (a) If the slot machine accepts gaming vouchers, the numerical and value cashable gaming voucher meters, and the numerical and value non-cashable gaming voucher meters;
- (b) If the slot machine accepts coupons enrolled in the gaming voucher system, the numerical and value cashable coupon meters and numerical and value non-cashable coupon meters;
- (c) If the slot machine accepts promotional credits, the electronic cashable credit meter and the electronic non-cashable credit meter; and
- (d) If the slot machine accepts funds from an account based wagering system, the wagering account transfer-in meter and the wagering account transfer out meter.

(12) The slot monitoring system shall provide a report to the accounting department for a comparison of the meter readings to the count room reports and the calculation of each slot machine's payout percentage. **In the event it is determined after a count that a shortage or overage exists between the total registered on a slot machine's accounting meters that are used to calculate gross gaming revenue, as described by GLI-11, 5.4.1 *Electronic Accounting and Occurrence Meters*, and the total value of the contents of the drop box, the licensee shall investigate to determine the cause and record the findings.** Only members of the accounting department shall have the authority to adjust meter readings subsequent to the count, **provided that notification is provided to the IEB and the commission's finance office if the shortage or overage was caused by a technical malfunction. The IEB and/or finance office may take any action necessary to ensure the integrity of the adjustment prior to the month end reconciliation and public reporting of gross gaming revenue.**

(13) Nothing in 205 CMR 138.00 or a gaming licensee's internal controls shall preclude the IEB from requiring a gaming licensee to read a slot machine meter manually as a remedial measure in the event of a malfunction or as it may otherwise deem necessary to ensure the integrity of gaming and the accurate reporting of gross revenue.

138.68: Expiration of Gaming-related Obligations Owed to Patrons: Payment to the Gaming Revenue Fund

(1) The system of internal controls submitted by a gaming licensee in accordance with 205 CMR 138.02 shall include provisions governing the expiration of gaming-related obligations, **and unclaimed cash and prizes** that provide, at a minimum, that:

(a) Any money that is owed to a patron by a gaming licensee as a result of a gaming transaction must be claimed within one year of the date of the gaming transaction or the obligation of the gaming licensee to pay the patron will expire. Upon expiration of the obligation, the involved funds must be transferred to the Gaming Revenue Fund in accordance with M.G.L. c. 23K, §§ 53 and 59-;

(b) Any unsecured funds that did not register on a slot machine's coin-in meter, as described in 205 CMR 138.33(7), must be claimed by the owner within one year of the date the funds are located or the obligation of the gaming licensee to pay the patron will expire. Provided, verification procedures designed to prevent fraudulent claims shall be included in the provision. Upon expiration of the obligation, the cash or equivalent cash value of the subject funds shall be transferred to the Gaming Revenue Fund in accordance with M.G.L. c. 23K, §§ 53 and 59; and

~~(b)~~ **(c) A gaming licensee shall maintain a record of all unclaimed cash and prizes and gaming-related obligations that have expired.**

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 140: GROSS GAMING REVENUE TAX REMITTANCE AND REPORTING

140.02: Computation of Gross Gaming Revenue

(3) Slot Machines and Other Electronic Gaming Devices. For purposes of complying with 205 CMR 140.01 relative to the gross gaming revenue payment for slot machine and other electronic gaming device gross gaming revenue, a gaming licensee shall pay the amount calculated by the commission. Disputed amounts shall be reconciled on a monthly basis as described in 205 CMR 140.04(1). Gross gaming revenue equals *drop*, minus jackpot payouts, including vouchers issued by the gaming device, and any hopper fills to the machine, subject to the following:

- (a) For purposes of 205 CMR 140.02(3), *drop* means the total value of coins, slot tokens, and foreign slot tokens in a slot drop bucket or a slot drop box, plus the value of currency, and gaming vouchers in a slot cash storage box, **unsecured funds located inside a slot machine but outside the slot drop box that registered on the coin-in meter**, and electronic credits withdrawn from a patron's account.
- (b) The initial hopper load, if any, shall not be considered a fill.
- (c) A gaming licensee shall not include the cash equivalent value of any merchandise or thing of value as part of the sum paid out as winnings or a jackpot.



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 of **205 CMR 138.28, 138.33, 138.68, and 140.02**, for which a public hearing was held on February 2, 2018. These amendments were developed as part of the process of promulgating regulations governing the operation of gaming establishments in the Commonwealth. The amendments address such things as the establishment of a gaming day by the gaming licensee, and procedures to ensure that all funds located inside a slot machine are properly accounted for. These regulations are authorized by G.L. c.23K, §§2, 4(37), and 5.

These amendments primarily apply to gaming licensees of gaming establishments, but also apply to patrons in a more limited fashion. Accordingly, these amendments are unlikely to have an impact on small businesses.

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 these amendments pertain primarily to licensees of gaming establishments, there are no 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 amendments.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

These amendments address gaming establishment operations and the handling of funds, so 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:



Massachusetts Gaming Commission

There are no design or operational standards for small businesses required in the proposed amendments. These amendments are directed solely at the licensee, and patrons in a limited capacity.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The proposed amendment does not deter or encourage the formation of new businesses in the Commonwealth, as it addresses the handling of funds in gaming establishments only.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

Shara Bedard
Paralegal

Dated: February 7, 2018



Massachusetts Gaming Commission

141.06: Notice to the Commission of Changes

A surveillance plan must provide for notification to the Commission ~~upon~~ **prior to** the occurrence of any of the following:

- (1) CCTV equipment is replaced; including any change/upgrade to system hardware, firmware or software, including identifying the reason for the change;
- (2) Slot machine (**in accordance with 205 CMR 144.03**) or table game (**in accordance with 205 CMR 138.66(3)(b)**) locations are modified (so as to enable the Commission to review the new locations for adequate coverage);
- (3) Equipment Failure Occurs. Notice of such shall be immediately made to the IEB, upon discovery by the gaming licensee, and include the time and cause of the malfunction, if known, the time that the security department was apprised of the malfunction by the surveillance department and any communications with the security department by the surveillance department relating to the malfunction; or
- (4) Camera relocation occurs.