

Hollywood Casino at Perryville

Regulatory Requirements for the Operation of Table Games

COMAR 36.03.11.06(E) provides the requirements for approval of initial video lottery terminal operations and was used at the framework for approval of table game operations. The Hollywood Casino at Perryville (facility) may not commence table game operations until the Commission has issued an amended operation license after determining that:

1. The facilities hours of operation have been approved by the Commission.

The facility has requested 24 hour gaming, 7 days a week upon implementation of table game operations. See attachment 1.

2. Facility design standards are in compliance with the provisions of COMAR 36.03.11.03.

The facility has requested a waiver to COMAR 36.03.11.03 (A)(7) that requires at least 400 square feet of office space for use by Commission staff . The property has stated that they currently do not have additional space beyond the current 300 square feet of Commission office space that can be made available to Commission staff. The facility has agreed to reconfigure the current office space to see if it can accommodate our requirements. MLGCA staff requests additional time to review the adequacy of the reconfiguration before providing a recommendation to the Commission on this waiver request.

3. All table game devices and associated equipment have been tested and comply with standards established by the Commission in accordance with the provisions of COMAR 36.03.12.05;

Attachment 2 outlines fourteen table game devices and associated equipment that

have been tested by our independent testing laboratories and are recommended for approval.

4. The facility operator's gaming floor plan complies with the provisions COMAR 36.03.11.05;

The facility has provided a floor plan that is in compliance with regulatory requirements. See attachment 3.

5. The facility operator's internal controls complies with the provisions of COMAR 36.03.10;

The facility has provided their internal controls for the operation of table games. MLGCA staff has reviewed the internal controls and has determined that they meet all regulatory requirements and recommend Commission approval.

6. The facility operator's surveillance plan complies with the provisions of COMAR 36.03.10.12, 36.03.10.13 and 36.03.11.04.

The facility has provided their surveillance plan for the operation of table games. MLGCA staff has reviewed the surveillance plans and has determined that they meet all regulatory requirements and recommend Commission approval.

7. The facility operator's security plan complies with the provisions of COMAR 36.03.10.14 and 36.03.10.15.

The facility has provided their security plans for the operation of table games. MLGCA staff has reviewed the security plans and has determined that they meet all

regulatory requirements and recommend Commission approval.

8. The facility operator's responsible gambling plan complies with the provisions of COMAR 36.03.06.02.

The facility has provided their responsible gambling plan for the operation of table games. MLGCA staff has reviewed the responsible gambling plan and has determined that they meet all regulatory requirements and recommend Commission approval. See attachment 4.

9. The facility operator is prepared to implement the internal controls, surveillance, security and responsible gambling procedures that are necessary to ensure that the operation of the table games and video lottery facility is conducted safely and legally;

The internal controls, surveillance, security and responsible gambling procedures have been reviewed and determined to be adequate for the legal and safe operation of table games. MLGCA staff will continue to oversee the training of facility employees and will conduct an assessment of their performance during the controlled demonstration.

10. The facility operator's employees are licensed by the Commission and trained in the performance of their responsibilities.

MLGCA staff continues to work with the facility to license all employees. It is anticipated that the facility will have sufficient licensed staff to conduct table game operations as projected. MLGCA staff has reviewed training programs and will continue to oversee training of facility employees through the opening of table game operations.

11. The facility operator's suppliers and contractors are registered or licensed with the Commission.

All facility supplies and contractors are or will be licensed prior to the operation of table games.

12. The facility is prepared in all respects to receive the public;

The final assessment will be determined during the controlled demonstration.

13. The facility operator has complies with any additional pre-opening conditions imposed by the Commission:

- a. Dealer training programs comply with the provisions of COMAR 36.05.03.16.

The facility has provided their dealer training programs that are in compliance with regulatory requirements.

- b. Gaming chips specifications and samples comply with the provisions of COMAR 36.05.02.02 through .04.

The facility has provided chip specifications and samples that are in compliance with regulatory requirements. See attachments 5a-d.

- c. Gaming dice specifications and samples comply with the provisions of COMAR 36.05.02.12.

The facility has provided dice specifications and samples that are in

compliance with regulatory requirements. See attachments 6.

- d. Gaming card specifications and samples comply with the provisions of COMAR 36.05.02.15.

The facility has provided gaming card specifications and samples that are in compliance with regulatory requirements. See attachments 7.

- e. Table game layouts comply with the provisions of COMAR 36.05.03.16.

The facility has provided table layout specifications for Black Jack, Three Card Poker, Four Card Poker, Craps and Roulette that are in compliance with regulatory requirements. See attachments 8a-e.

- f. Table game equipment specifications comply with the provisions of COMAR 36.05.03.16.

The facility has provided table game equipment specifications that have been reviewed and determined to be in compliance with regulatory requirements. See attachment 9.

- g. Table game rules comply with the provisions of COMAR 36.05.03.19 and 36.03.12.05.

The facility has provided table game rules for the Black Jack, Three Card Poker, Four Card Poker, Craps, Roulette and Poker. The rules from Black Jack deviate from the regulations with the addition of a progressive feature. Three Card Poker and Four Card Poker had modifications to the paytables

as a result of updated information received from the game patent holder.

Approval of the changes are recommended. Staff will submit changes to the regulations when the regulations become permanent. See attachment 10.

- h. Table game rule guides comply with the provisions of COMAR 36.05.03.16.

Table game rule guides were submitted in compliance with regulatory requirements. See attachment 11.

- i. Table game equipment storage and destruction areas comply with the provisions of COMAR 36.05.03.16.

Table game equipment storage and destruction areas will be reviewed upon completion of construction and prior to receipt and storage of equipment.

- j. Table game staffing plans and table of organization comply with the provisions of COMAR 36.05.03.16 and 36.03.10.10.

Table game staffing plans and table of organization have been provided by the facility and comply with regulatory requirements. See attachment 12.

- k. Minimum bankroll requirements comply with the provisions of COMAR 36.03.10.19.

Minimum bankroll requirements have been submitted as required.

- l. Drop route and schedule comply with the provisions of COMAR 36.03.10.43.

Maryland Lottery and Gaming Control Agency

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Drop routes and schedules have been submitted as required.

- m. Count schedule comply with the provisions of COMAR 36.03.10.45.

Count schedules have been submitted as required.

- 14. The facility operator has successfully completed a test period.

The facility is scheduled to conduct a controlled demonstration of table game operations on March 5, 2013.