Maryland Lottery and Gaming Control Agency

Larry Hogan, Governor • Gordon Medenica, Director

Montgomery Park Business Center 1800 Washington Blvd., Suite 330 Baltimore, Maryland 21230



Tel: 410-230-8800 TTY users call Maryland Relay www.mdlottery.com

Ocean Downs Casino

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 as the framework for approval of table game operations. The Ocean Downs Casino (facility) may not commence table game operations until the Commission has issued an amended operation license after determining that:

1. The facility's hours of operation have been approved by the Commission. *The facility is requesting the following schedule of operating hours:*

Beginning on the first Monday of October each year:

- Monday through Thursday, 8am 4am
- Friday 8am through Monday 4am, 24 hour operations
- Beginning on the Monday one week prior to Memorial Day each year:
 - Full 24 hour 7 day a week operation

Annually, from December 26th to January 2nd:

- Full 24 hour operation on all weekdays (Monday through Thursday) during the holiday week in addition to the standard 24 hour operation on weekends.
- 2. Facility design standards are in compliance with the provisions of COMAR 36.03.11.03. *The facility is in compliance with the provisions of this regulation.*
- 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;

All table game devices and associated equipment that have been tested by our independent testing laboratories and approved by the Commission. Onsite configuration and accounting testing will continue through the controlled demonstrations.

- 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.*
- 5. The facility operator's internal controls complies with the provisions of COMAR 36.03.10; *The facility internal controls for the operation of table games have been submitted and are pending final 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.

- 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 the facility.
- 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 demonstrations conducted on Monday, December 18, 2017.
- 13. The facility operator has complied 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.

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.

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.

e. Preshuffled decks or batches of decks provided by manufacturer or contractor to facility operator comply with provisions COMAR 36.05.02.16

The internal controls for preshuffled decks or batches of decks are in compliance with regulatory requirements.

f. Table game layouts comply with the provisions of COMAR 36.05.03.16.

The facility has provided table layout specifications for Black Jack, Craps, Three Card Poker, Ultimate Texas Hold'em, and Roulette that are in compliance with regulatory requirements.

g. 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.

h. 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 Black Jack, Craps, Poker, Three Card Poker, Ultimate Texas Hold'em and Roulette that have been reviewed and determined to be in compliance with regulatory requirements.

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

Table game rule guides have been submitted and are pending final approval.

j. 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 prior to receipt and storage of equipment.

k. 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.

l. Minimum bankroll requirements comply with the provisions of COMAR 36.03.10.19.

Minimum bankroll requirements have been submitted and are pending final approval.

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

Drop routes and schedules have been submitted and are pending final approval.

l. Count schedule comply with the provisions of COMAR 36.03.10.45.

Count schedules have been submitted and meet all regulatory requirements.

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

The facility is scheduled to conduct a controlled demonstration of gaming operations on December 18, 2017.