

Evitts Resort LLD DBA Rocky Gap Casino Resort

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 Rocky Gap Casino Resort (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 is currently approved for 24 hour gaming, 7 days a week and is not seeking a change to the schedule.

2. Facility design standards are in compliance with the provisions of COMAR 36.03.11.05.

The facility is in compliance with all provision of the 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 have been tested by our independent testing laboratories and approved by the Commission.

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 1.

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 poker 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 updated surveillance plan for the operation of poker table games. MLGCA staff has reviewed the surveillance plans and has determined that they meet all regulatory requirements and recommend Commission approval. See attachment 2.

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 updated security plans for the operation of poker table games. MLGCA staff has reviewed the security plans and has determined that they meet all regulatory requirements and recommend Commission approval. See attachment 3.

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

No changes have been made to the responsible gambling plan for the operation of table games submitted to the Commission on April 26, 2013. MLGCA staff has reviewed the responsible gambling plan and has determined that they meet all regulatory requirements.

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 poker 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 poker dealer training program that is in compliance with regulatory requirements. See attachment 4.

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

No additional chip specifications have been submitted to MLGCA staff for operation of the poker tables. The facility submitted chip specifications and samples to the Commission on April 26, 2013 that are in compliance with regulatory requirements.

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

This is not applicable to the poker room.

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

36.05.02.15.

The facility has provided poker gaming card specifications that are in compliance with regulatory requirements. Card samples will be submitted and reviewed prior to the controlled demonstration. See attachment 5.

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

The facility has provided table layout specifications for Poker that are in compliance with regulatory requirements. See attachment 6.

- 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.

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

The facility has provided Poker table game rules. See attachment 7.

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

Table game rule guides will be submitted and reviewed prior to the controlled demonstration.

- 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 have been reviewed and were in compliance with regulatory requirements.

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

No changes have been made to the table game staffing plan and table of organization submitted to the Commission on April 26, 2013. MLGCA staff has reviewed the table game staffing plan and has determined that it meets all regulatory requirements.

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

No changes have been made to the minimum bankroll requirements submitted to the Commission on April 26, 2013. MLGCA staff has reviewed the minimum bankroll requirements and has determined that it meets all regulatory requirements.

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

Update drop routes and schedules have been submitted as required. See attachment 8.

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

Maryland Lottery and Gaming Control Agency

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No changes have been made to the count schedule submitted to the Commission on April 26, 2013. MLGCA staff has reviewed the count schedule and has determined that it meets all regulatory requirements.

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

The facility is scheduled to conduct a controlled demonstration of poker table game operations on October 3, 2013.