

Downstream Authority of the Quapaw Tribe of Oklahoma Regular Meeting
April 24, 2013

Meeting Called to Order: 10:01 am

ROLL CALL:	John Berrey, Chairman	Present
	Larry Ramsey, Secretary	Present
	Ranny McWatters, Treasurer	Present
	Marilyn Rogers, Member	Present
	Tamara Smiley, Member	Present

DECLARATION OF QUORUM: announced by Larry Ramsey
Jani/Kent

Discussion on possible cost cutting items

- Freeze hiring – only those that are mission critical will be posted
- Hire part time when possible
- Freeze wage/salary increase or limit
- Prohibit overtime
- Changes to insurance
- Eliminate excessive company phones
- Suspend 401K match
- Suspend bakery ops
- DLC – increase rates to 2 star level
- Hotel room amenities
- EDR – charge minimal fee
- Cut consulting fees
- Cut large sponsorships
- Cut back on donations
- Hold off on any additional large commercial productions
- Cut excess travel
- Close Q Store from 1am – 5am
- Cut or eliminate bonuses for 2013
- Wage concession

Nothing approved for today, a lot to review and consider.

DDA Minutes

- Jan –March 2013

Motion by DDA Member Tamara Smiley to approve past minutes as presented. Seconded by DDA member Marilyn Rogers. Vote: JB y; RM y; LR y; MR y; TS y (5 yes, 0 no, 0 absent) motion passes.

Marketing Play and Earn

- Solar bird house/feeder – YES
- Solar mosaic light – NO
- Solar mosaic 3 piece light – YES
- Mosaic bird feeder – YES

September \$10 items

- Expandable pocket hose – NO
- Flash light/lantern – YES
- Road side safety kit – NO
- Digital grilling fork – NO
- Thirsty stone – NO
- Spa set – NO
- Scarf – NO
- Umbrella w/ bag – NO
- Dip chiller – YES
- Glass platters x3 – YES
- Travel alarm clock – NO
- Robe – NO

Temptations serving dishes

- Square

Policies

7400.05.02 – Emergency Operating Procedures

7400.11.02 – Use of Force

6320.24.01 – Controlled Access Policy

6230.04.02 – Promotion Submission Procedures

6030.11.01 – Procurement Policy

Motion by DDA Treasurer Larry Ramsey to approve policies as presented. Seconded by DDA Treasurer Ranny McWatters. Vote: JB y; RM y; LR y; MR y; TS y (5 yes, 0 no, 0 absent) motion passes.

Dirt Road Logo

- Options presented



- Like option 3, but would like to see a color change

Donations:

Holiday Island Elks Lodge #1042	40 at Spring River	Night stay	
Friends of Washington Regional Hospice	150 at Red Oak	Night stay	100 Spa
Joplin Area Catholic Schools	40 at Spring River	Night stay	
Big Brothers Big Sisters of the Ozarks	40 at Spring River	Night stay	
Shell Knob Seniors	40 at Spring River	Night stay	
Duck's Unlimited	40 at Spring River	Night stay	
Monett Jaycees	40 at Spring River	Night stay	
Marquette Catholic School	150 at Red Oak	Night stay	150 Spa
Marquette Catholic School	150 at Red Oak	Night stay	150 Spa

Adjourn 4:28 pm

Quapaw Tribal Gaming Agency



Date Received	3/13/13 MB
Comments	
Reviewed By	MIC 3/14/13 JB 3/14/13 BM 3/14/13
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Controlled Access Policy – Change to Master Access List Policy #6320.24.01	Department: Compliance	Submission Date: 3/7/2013
Narrative Description: To establish Downstream Casino Resort (DCR) Team Member and vendor access to secured areas. This submission is for revisions to the Master Access List only. The revisions include: <ul style="list-style-type: none"> - Add Electronic Media Specialist position since it is a new position at DCR; - Provide MOD access to the Card Vault/Card Destruct Room with a Security escort since the MOD participates in transporting Poker cards to the Card Destruct room; - Provide Income Audit access to the IDF & Server Rooms with a Department escort since we perform monthly Electronic Gaming Machine (EGM) audits and some of the EGMs are server based. 		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED APR 24 2013

DCR Compliance Authorization

Signature: Stephanu Hardy 2551

Date: 3/7/13

Department Director Authorization

Signature: [Signature]

Date: 3/7/13

General Manager/Assistant General Manager Authorization

Signature: [Signature]

Date: 3-14-13

QTGA Authorization

Signature: [Signature]

Date: 3/19/13

Controlled Access Policy	Policy No: 6320.24.01	Issue Date: 7/20/2011
PURPOSE: To establish Team Member and vendor access to secured areas.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/20/2011
Compliance Review	3/17/2010
QTGA Submission	3/23/2010
QTGA Final Approval	3/23/2010
GM Approval	3/21/2010
Compliance Revisions	8/4/2010
QTGA Submission	8/5/2010
QTGA Return	9/1/2010
Compliance Review	9/3/2010
Compliance Review	4/8/2011, 4/14/2011
QTGA Submission	4/25/2011
QTGA Return	5/11/2011
Compliance Review	6/2/2011
QTGA Submission	6/9/2011
QTGA Return	6/30/2011
Compliance Review	6/30/2011
QTGA Submission	7/14/2011
GM Approval	7/12/2011
DDA Final Approval	7/27/2011

POLICY

1. It is the policy of the Downstream Casino Resort (DCR) to restrict access to secure areas. Secured areas include the following:
 - a. Cage
 - b. Poker Cage
 - c. High Limit Cage
 - d. Main Bank
 - e. Man Trap
 - f. Gaming Pits

- g. Count Room
 - h. Soft Count Cart Room
 - i. Card Vault Room/Card Destruct Room
 - j. Server Room
 - k. IDFs
 - l. Surveillance Viewing Room
 - m. Surveillance Monitoring Room
 - n. Back of House
2. DCR has developed an access list (pg. 4), which is attached and titled "Master Access List". The list identifies secured areas of DCR and which group of Team Members, Vendors, and Visitors has access to those secured areas. The list also indicates whether the Team Members, Vendors, or Visitors have instant access or require a Security or department escort to enter the secured area.
 3. Any other Team Member of DCR that needs access to any of the identified secured access areas will need approval via a Secured Access Request/Activity Review Form.
 4. Vendors without individual key licenses will be treated as visitors and will not be allowed to enter the back of the house without an escort by Security or a Team Member from the Department being visited. Security will obtain the Vendor's drivers license in exchange for a visitor's badge. They will not be allowed in any secured area of DCR until they have a valid key license.
 5. Vendors with individual key licenses will be allowed in the back of the house as long as they are escorted by Security or the Department Team Member. Security at Post 3 will obtain the Vendor's drivers license in exchange for a vendor badge. They will be allowed in secured areas of DCR as long as they are escorted by the Department Lead or above or designee.
 6. Emergency personnel may have access to secured areas of DCR under special circumstances, such as a medical emergency.
 7. Any Quapaw Casino Team Member may enter the back of house as long as they are escorted by Security or a Team Member from the Department. A visitor badge is not necessary if they are displaying their Quapaw Casino gaming badge. If they do not have their Quapaw Casino gaming badge, then Security will obtain their driver's license in exchange for a visitor's badge.

They will not be allowed in any secured area of DCR unless there is a Secured Access Request allowing them to enter the secured area.

8. The Quapaw Tribe Business Committee may enter the back of the house without an escort. They will follow the same guidelines as the DDA in secured areas, which is to be escorted by the Department Lead or above or designee in those secured areas.
9. There are secured doors that require a proxy card to access, such as the VIP and Shipping Hall Doors. Management approval is required for Team Members to obtain a badge allowing access to these doors.

PROCEDURE

Master Access List

1. The Master Access List shall be proposed by DCR's Compliance Department and be approved by the General Manager and Chief Financial Officer (CFO) of DCR. Once it is approved by the General Manager and CFO, it shall be submitted to the Quapaw Tribal Gaming Agency (QTGA) for review and approval prior to implementation.
2. Any requested alterations to the Master Access List shall be provided to DCR's Compliance Department. Once the revised Master Access List is approved by the General Manager and CFO, it shall be submitted to QTGA for approval.
3. At a minimum, the Master Access List shall be reviewed and approved by the CFO and General Manager of DCR and submitted as approved to the QTGA at least annually.

Control of Proxy Cards

1. The QTGA will program the Team Member badges which contain proxy cards, according to the Master Access List.

Access

Team Member, Vendor and Visitor access will be controlled in these categories:

1. Unrestricted Access - Team Members granted immediate unescorted access to the area due to daily work being performed as approved in the Master Access List.
2. Security Escort Access- Team Members or Key Licensed Vendors are escorted by Security and are granted access as approved in the Master Access List.

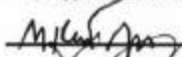
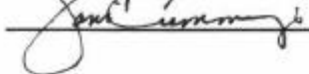
3. Department Escort Access- Team Members or Key Licensed Vendors are escorted by the Department Lead or above or designee and are granted access as approved in the Master Access List.
4. Secured Access Request/Activity Review Form Required - Team Members who are only granted access as approved by a requesting department, DCR Compliance Department, and QTGA (Compliance Agent, Compliance Supervisor, Compliance Manager, Deputy Director or Executive Director) as noted on a Activity Review /Secured Access Request form (pg. 5). Approval may be written or verbal.

Area	Cage	Poker Cage	High Limit Cage	Main Bank	Main Trap	Gaming Pits	Count Room (In Progress)	Count Room (Not in Progress)	Soft Count Cart Room	Card Vault/Card Destruct Rooms	Server Room	ID#	Surveillance Viewing Room (Must sign log)	Surveillance Monitoring Room (Must sign log)	Back of the House
Team members															
DDA	D	D	D	D	D	D	D	D	D	S	D	D	D	D	✓
General Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	*	*	✓
Assistant General Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	*	*	✓
CFO	✓	✓	✓	✓	✓	D	✓	✓	✓	D	D	D	*	*	✓
Gaming Operations Controller	✓	✓	✓	✓	✓	D	✓	✓	✓	D	D	D	*	*	✓
Gaming Operations Director	X	X	X	X	X	✓	X	X	X	D	D	D	*	*	✓
Security Guards and above	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓
Director of Surveillance	✓	✓	✓	✓	✓	✓	✓	✓	✓	D	D	D	✓	✓	✓
Manager on Duty	X	X	X	X	S	✓	X	D	D	S	X	X	*	*	✓
Main Bank Cashiers or above	✓	✓	✓	✓	✓	S	D	D	S	X	X	X	*	*	✓
Cage Cashiers	✓	✓	✓	D	✓	X	X	X	X	X	X	X	X	X	✓
Count Team Members or above	X	X	X	X	✓	X	✓	✓	✓	X	X	X	*	*	✓
Poker/Table Game Team Members or above	X	X	X	X	X	✓	X	X	X	X	X	X	*	*	✓
EGM Techs/Tech Manager/Tech Supervisor	X	X	X	X	X	X	X	X	X	X	X	X	*	*	✓
IT Team Members or above	S	S	S	S	S	D	S	S	S	X	✓	✓	*	*	✓
Electronic Media Specialist	S	X	X	X	S	S	X	X	X	X	X	X	X	X	✓
Income Auditors	D	D	D	D	✓	S	X	S	S	S	D	X	X	X	✓
Internal Auditor	✓	✓	✓	✓	✓	✓	✓	✓	✓	S	D	D	✓	✓	✓
Compliance (DCR)	✓	✓	✓	✓	✓	✓	✓	✓	✓	S	D	D	✓	✓	✓
Surveillance Agents and above	X	X	X	X	X	X	X	X	X	X	X	X	✓	✓	✓
Surveillance Tech.	S	S	S	S	✓	S	S	S	S	S	D	✓	✓	✓	✓
Risk Manager	S	S	S	S	S	S	X	S	S	S	D	D	*	*	✓
Facilities Team Members with key licenses	S	S	S	S	S	S	X	S	S	S	D	D	*	*	✓
Other DCR Team Members	A	A	A	A	A	A	A	A	A	A	A	A	X	X	✓
Vendors with Valid Individual Key Licenses	D	D	D	D	D	D	D	D	D	S	D	D	*	*	D
QTGA	✓	✓	✓	✓	✓	✓	✓	✓	✓	S	D	D	✓	✓	✓
Visitors/Vendors without Individual Key Licenses	X	X	X	X	X	X	X	X	X	X	X	X	X	X	D
External Auditors	A	A	A	A	A	A	A	A	A	A	A	A	A	A	✓

Access Code Key

- ✓ - Unrestricted Access
- A- Activity Review/Secured Access Form
- S- Security Escort
- X- Restricted Access
- D- Department Escort (Lead or Above or Designee)

* - See approved Surveillance Access in Surveillance Standards Policy

 Chief Financial Officer
 General Manager/Assistant General Manager

Date Received: _____ Reviewed By: _____

Comments: _____

☐ Approved

☐ Not Approved



Quapaw Tribal Gaming Agency

Secured Access Request and Activity Review Form For Downstream Casino

Date: _____ Time: _____

Work to be performed:

Name of individuals involved and badge # if applicable:

<u>Access Area</u>	<u>Yes</u>	<u>No</u>	<u>Access Area</u>	<u>Yes</u>	<u>No</u>
Cage			Poker Cage		
High Limit Cage			Main Bank		
Soft Count Cart Room			Count Room (In progress)		
Count Room (Not in progress)			Surveillance		
Pit Access # _____			Server Room		
IDF# _____					

Casino Compliance Authorization or Designee

Signature: _____

Date: _____

Requesting Department Authorization

Signature: _____

Date: _____

QTGA Authorization

Signature: _____

Date: _____

Quapaw Tribal Gaming Agency



McKangrec. 4/8/13

Date Received	
Comments	
Reviewed By	McK 4/8/13 JB 4/8/13 4/15/13
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Emergency Operating Procedures Policy #7400.05.02	Department: Security	Submission Date: 4/5/2013
Narrative Description: To establish comprehensive procedures in the event an emergency arises. This is a revision to version #7400.05.02. This revision was to add emergency operating procedures for the new Hotel tower. Revisions were also made to positions/contact names due to employment changes.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED APR 24 2013

DCR Compliance Authorization

Signature: Stephanie Hardy 2551

Date: 3/29/13

Department Director Authorization

Signature: [Signature] 622

Date: 4/1/13

Asst General Manager Authorization

Signature: [Signature] 2298

Date: 4-5-13

QTGA Authorization

Signature: [Signature]

Date: 4/15/13

Emergency Operating Procedures	Policy No: 7400.05.02	Issue Date: 4/15/2013
PURPOSE: To establish comprehensive procedures in the event an emergency arises.		

DCR Compliance – ITEM Tracking	Date
Issue Date	4/15/2013
QTGA Return	11/10/2009
Compliance Review	12/3/2009
QTGA Submission	12/11/2009
QTGA Return	4/8/2010
Compliance Review	6/16/2010
QTGA Submission	6/24/2010
QTGA Final Approval	7/15/2010
GM Approval	6/24/2010
DDA Final Approval	8/12/2010
Compliance Review to #7400.05.01	1/17/2013
QTGA Submission	1/21/2013
QTGA Return	2/21/2013
Compliance Review	3/1/2013
QTGA Submission	3/1/2013
QTGA Return	3/8/2013
Compliance Review	3/29/2013
QTGA Submission	4/5/2013
GM Approval	4/1/2013
QTGA Approval	4/15/2013
DDA Approval	4/24/2013

CRISIS COMMUNICATION PLAN

INTRODUCTION

In a crisis, correct information becomes critical. That information needs to be quickly relayed to Team Members as well as the media. What follows is an outline of actions to be taken in order to get accurate information out to the public during a crisis situation. All communications to the Tribal Council or Board of Directors of the Downstream Casino Resort will be done by the General Manager, Assistant General Manager or designee.



EMERGENCY OPERATING PROCEDURES

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CHAIN OF COMMAND AND CRISIS TEAM

Remember, reporters will get the story out whether we cooperate or not. If they cannot get information from us, they will most likely turn to our players or our Team Members, who may not have correct information. It is best if we cooperate and have the ability to give them accurate information in a professional manner. Therefore, it is important that only designated personnel be allowed to speak for the company. This includes the General Manager, Assistant General Manager, Security Director, and Public Relations Manager. Depending on the crisis, the Public Relations Manager will most likely be the point person with the press. That individual needs to be given information to relay to the media. Review Chapter 19 immediately before proceeding.



EMERGENCY OPERATING PROCEDURES

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EMERGENCY

OPERATING

PROCEDURES



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OUTSIDE EMERGENCY TELEPHONE NUMBERS

F.B.I OKLAHOMA CITY, OK Phone: (405)-290-7770
3301 W Memorial Rd Fax: 405-290-3885
Oklahoma City, OK 73099
All Counties are covered by the FBI Field Office Oklahoma City, OK

Kansas Bureau Investigation KBI Local
1620 SW Tyler Phone: (620)-230-5826
Topeka, KS 66612
Main Office Phone: (785)-296-8200

F.B.I Kansas City, MO Phone: (816)-512-8200
1300 Summit Email: Kansascity@ic.fbi.gov
Kansas City, MO 64105
All Counties are covered by the F.B.I Field Office Kansas City, MO for MO, and KS.

Satellite Office State of KS and MO
Resident Agency
2306 S Rangeline Rd, Suite 201 Phone: (417)-624-6545
Joplin, MO 64804

Ambulance/Emergency

Quapaw Tribal EMS Phone: (918) 919-6075
Quapaw, OK 74363

Baxter Ambulance SVR Phone: (620)-856-3122
311 Military Ave
Baxter Springs, KS 66713

Newton County Ambulance Phone: (417)-781-5256
101 South Wood
Neosho, MO 64850

The Dispatch number goes to the City of Joplin Police Department

Redings Mill
Ambulance Non-Emergency Phone: (417)-451-5568



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Fire Protection

Quapaw Tribal Fire Department Quapaw, OK	Phone: (918)-919-6075; (918)-919-6074
---	--

Redings Mill Fire Protection District Emergency Redings Mill, Mo	Phone: (417)-624-2715 Fax: (417)-624-1470
--	--

Joplin Fire Department 303 East 3 rd street Joplin, MO 64801	Phone: (417)-623-0403
---	-----------------------

Hospitals

Mercy Corporate Heath 2817 St. John's Boulevard Joplin, MO 64804	Phone: (417)-781-2727
--	-----------------------

Freeman Health System 1102 W 32 nd Street Joplin, MO 64804	Phone: (417)-347-1111 Email: freemanhealth.com
---	---

Integrus Baptist Regional Health Center 200 2 nd Ave SW Miami, OK	Phone: (918)-542-6611
--	-----------------------

Sheriff's Department

Ottawa County Sheriff Office 28 B SE Miami, OK 74354	Phone: (918)-542-2806 Fax: (918)-542-3189
--	--

Cherokee County Sheriff Office 915 E County Rd Columbus, KS 66725	Phone: (620)-429-3992 Fax: (620)-429-1454
---	--

Newton County Sheriff Office 208 W Coler Neosho, MO 64850	Phone: (417)-451-8300 Fax: (417)-451-8352
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Jasper County Sheriff Office
405 E 5th Street
Carthage, MO 64836

Phone: (417)-358-0426

JASCO 911 Center
Emergency
Non-Emergency

Phone: (417)-624-1600

Phone: (417)-359-9100

Highway Patrol

Kansas Highway Patrol

Phone: (620)-429-3012

Missouri Highway Patrol

Phone: (417)-359-1500

Oklahoma Highway Patrol

Phone: (918)-256-3388

Police Department

Quapaw Tribal Marshalls
715 West A St.
Picher, OK 74360

Phone: (918) 673-1709

Joplin Police Department
303 East 3rd Street
Joplin, MO 64801

Phone: (417)-623-3131

Ext: 405/420/421

Baxter Springs Police Department
121 West 11th Street
Baxter Springs, KS 66713

Phone: (620)-856-2112

Quapaw Tribe Environmental Department

5681 South 630 Rd.
Quapaw, OK 74363

Phone: (918) 542-1853

Tim Kent

Phone (417)438-1104

Empire District Electric

Phone: (1-800-206-2300)

EMERGENCY OPERATING PROCEDURES

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IN HOUSE MATRIX EMERGENCY NOTIFICATIONS

In column one are the types of incidents described in the Emergency Operating Procedures Plan. In column two are the people who will be notified when these incidents occur.

<u>Type of Incident</u>	<u>Who to Notify</u>
1. Bomb Threat	1,2,3,4,5,6,7,8,10,11,12,17,20,21,22
2. Actual Bomb	20,1,2,3,4,5,6,7,8,9,10,11,12,13,17,21,22
3. Power Failure	1, 2,3,4,6,7,10,11,12,22
4. Actual Fire/Smoke	20,1,2,3,4,5,6,7,8,9,10,11,12,13,17,21,22
5. Natural Disaster	20,1,2,3,4,5,6,7,8,9,10,11,12,13,17,21,22
6. Explosion	20,1,2,3,4,5,6,7,8,9,10,11,12,13,17,21,22
7. Evacuations	1,2,3,4,5,6,7,8,9,10,11,12,17,20,21
8. Active Shooter	1,2,3,4,5,6,7,8,9,10,11,12,13,17,20,21,22,
9. Armed Robbery	1,2,3,4,5,6,7,8,9,10,11,12,13,20,21,22,
10. Suicide/Death	20,1,2,3,4,5,6,7,8,9,10,11,12,13,17,21,22
11. Extortion/Kidnapping	1,2,3,4,5,6,7,8,9,10,11,12,13,21,22
12. Hazardous Spill	20,1,2,3,4,5,6,7,8,23,9,10,11,13,17

<u>Title</u>	<u>Name</u>	<u>Office #</u>	<u>Cell #</u>
1. Assistant General Manager	Jani Cummings	(918)919-6230	(918)919-9795
2. Assistant General Manager	Ernie Dellaverson	(918)919-6232	(860)460-1089
3. Legal Counsel	Jack Brill	(918)919-6421	(918)961-8249
4. Security Director	Bill Goodwin	(918)919-6080	(918)919-9097
5. Security Manager	Security Manager	(918)919-6083	(918)919-1218
6. Surveillance Director	Bill Cornell	(918)919-6280	(417)622-3378
7. TG Manager on Duty	MOD	(918)919-6202	(918)919-2542
8. Risk Manager	Linda Shipman	(918)919-6263	(918)919-9976
9. Director of Marketing	Shawn Carlson	(918)919-6212	(918)919-9068
10. Director of Construction	Ernie Caruthers	(918)919-6905	(918)541-8731
11. Chief Financial Officer	Kent Jones	(918)919-6050	(918)541-8939
12. Gaming Operations Director	Bob Moritz	(918)919-6053	(918)541-4497
13. Chairman	John Berrey	(918)919-0919	(918)697-8845
14. VP of IT	Dave Clark	(918)919-6295	(918)541-8746
15. Director of Hotel	Bob Bergquist	(918)919-6150	(918)919-9794
16. Director of Food & Bev	Brian Kenney	(918)919-6130	(918)541-8940
17. Director of HR	Jani Cummings	(918)919-6230	(918)919-9795
18. Surveillance Office		(918)919-6286	
19. Manager of Table Games	Sean Matthews	(918)919-6052	(918)919-9457



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(FOR BELOW PHONE NUMBERS, SEE "OUTSIDE EMERGENCY PHONE NUMBERS" on preceding pages)

20. Fire Department

21. Police Department

22. County Sheriff Department

23. Quapaw Tribe Environmental Department

24. PBX (918) 919-6000, 6001, 6012

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HELICOPTER LANDING SITE FOR MEDICAL-EVACUATION or PATRON LANDING

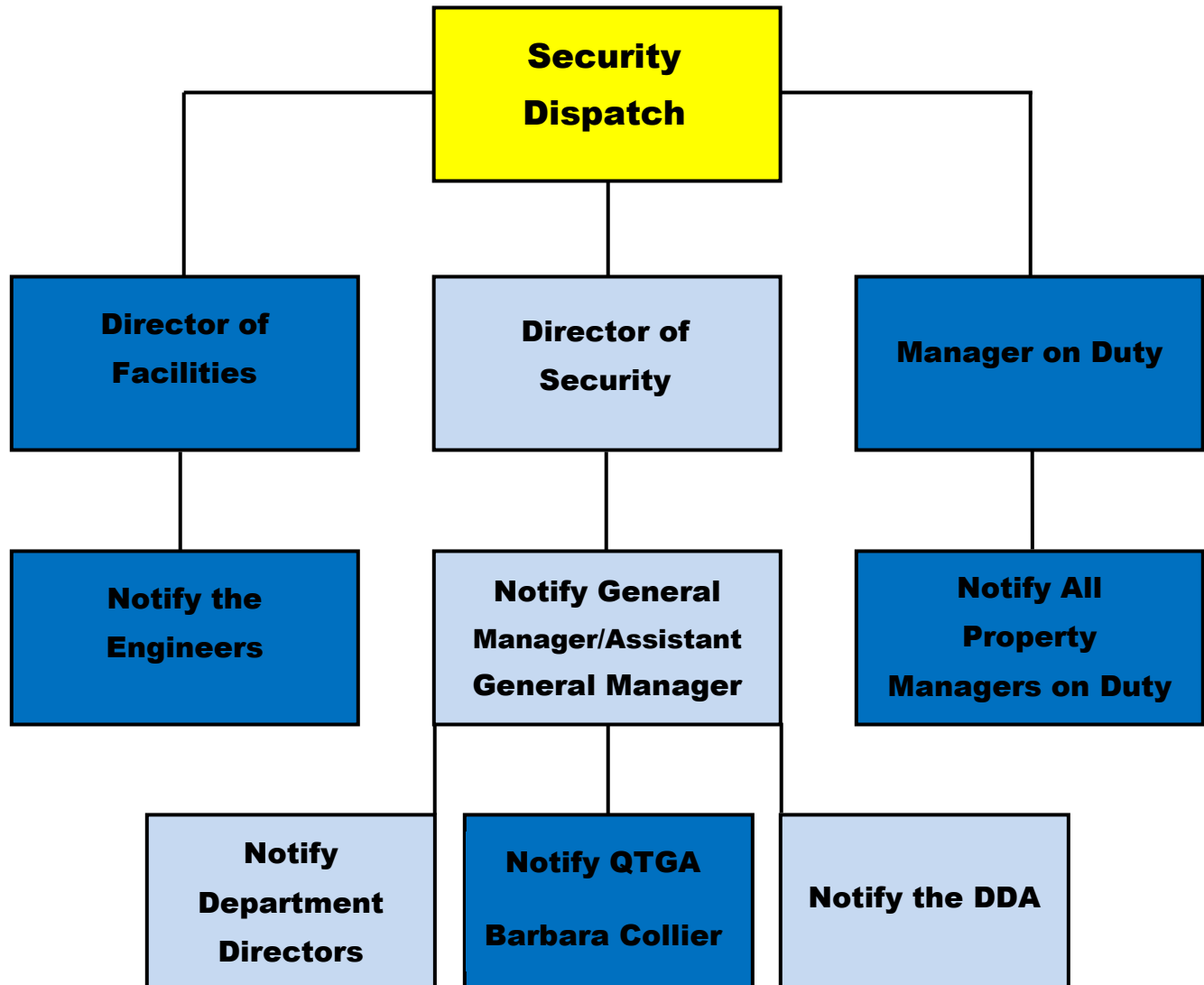
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DCR EMERGENCY NOTIFICATION DIAGRAM





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GEOGRAPHIC LOCATION/BUILDING INFORMATION

Geographic Location:

69300 E. Nee Rd. Quapaw, Oklahoma 74363

Current owner of property:

The Quapaw Tribe of Oklahoma

Property Type:

Commercial (tribal)

Number of buildings:

One major (casino/hotel/resort) and several smaller outer buildings.
Also includes Learning Center, Quapaw EMS/Fire Dept., and the Q-Store convenience store.

Parking Type:

Asphalt

Building Materials:

Mostly metal some wood and stone

Fire / Life Safety:

Portable fire extinguishers, pull stations, audible alarm, and strobe lights. There are emergency fire hydrants outside the building. There are hose connections inside the building.

Dumpster:

Located by loading dock

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PURPOSE

This Emergency Operating Procedures plan is designed to provide a framework for protecting the Team Members, guests and the facilities of Downstream Casino Resort, as well as to describe the responsibilities of Team Members, for a wide range of emergency and disaster situations that may occur.

In the event of a widespread emergency, such as a tornado, it is recognized that available city and government resources will be overtaxed and may be unable to respond to all requests for assistance. This plan assumes that the facility must be self-sufficient for a time period of up to 72 hours and may be required to provide shelter to Team Members and others. No plan can provide for every contingency and the on-scene manager is expected to take whatever actions are in the best interest of the Team Members and guests in their charge. The contents of this document are passed on as guidelines, but at the time of the crisis, common sense, combined with knowledge of the circumstances of the situation must prevail.

The overall purpose of this plan is to minimize the adverse affects of any disaster, big or small, and to reduce the injuries to Team Members and others that may be visiting the facility.

The contents of this manual are to be utilized as basic standard operating procedures for any emergency situation that might develop including but not limited to:

1. Fire/Evacuation
2. Armed Robbery
3. Bomb Threat
4. Chemical Evacuation
5. Suicide/Death
6. Severe Weather
7. Civil Disturbance
8. Power Failure
9. Extortion/Kidnap

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10. Active Shooter

This manual contains standard procedures that will be followed should any emergency situation dictate their implementation. This plan is applicable to all existing departments and Team Members of Downstream Casino Resort.

OVERALL PROGRAM RESPONSIBILITIES

Incident Commander

1. Incident command will be determined by the type of incident. Following are incidents that may be anticipated and the corresponding incident commander:

INCIDENT	INCIDENT COMMANDER¹
FIRE	QUAPAW TRIBE FIRE/EMS
WATER MAIN BREAK	FACILITIES DEPARTMENT
ELECTRICAL ISSUES	FACILITIES DEPARTMENT
MEDICAL EMERGENCY	QUAPAW TRIBE FIRE/EMS
CRIME RELATED INCIDENTS	SECURITY DEPARTMENT/ QUAPAW MARSHALLS

2. The person first encountering the incident should immediately contact Security Dispatch extension 6083.
3. Incident commanders shall relinquish command to appropriate higher authority upon their instruction.

Emergency Evacuation Maps

The Facilities Manager will be responsible for maintaining and posting emergency evacuation maps.

Training

1. Human Resources will be responsible for providing training to all Team Members on initial assignment and annually thereafter. This training will include the general elements of the Emergency Operating Procedures Plan including emergency evacuation routes and fire extinguisher locations.
2. Portable fire extinguisher training will be conducted annually and will include Managers and Supervisors.
3. Managers, Supervisors, Risk Manager and Security will maintain current certification on training in the following:

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- a. Blood Borne Pathogen Exposure Control Awareness
 - b. Fire extinguisher (Initial and annual)
 - c. Emergency Action Plan Including Evacuation Procedures
4. Documentation of this training will be retained in the Human Resource office and will include trainee's name, date, signature of participant, trainer name and the subject covered.

EOP Manual Changes and Updates

The Security Department will be responsible for maintaining and updating the Emergency Operating Procedures manual.

Emergency Food and Supplies

The Risk Manager and the Food and Beverage Director will evaluate the need for additional emergency supplies, emergency food and water ensuring that provisions are made for self-sufficiency for a 72-hour period. Supplies will be stored in the kitchen.

First Aid Kit Locations

The locations of First Aid Kits are as follows:

Security Office = Post #3 closet
Electronic Gaming Machine (EGM) Department
Hotel
Players Club
Casino Legends Bar
Cashiers Cage
Facilities = large cabinet
Buffalo Grill = x3
Both Kitchens = large cabinets x5
Executive Office Area
Wardrobe
Wa NA Bee DEA
EMT Room
Inside Warehouse
EVS Back of House
Kappa Front Desk

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CHAPTER 1 – FIRE EMERGENCY

CLASSIFICATION OF FIRES

All fires are classified in five different categories. The type of fire extinguisher you should use will depend on the type of fire.

1. **CLASS A:** Fires in ordinary combustible materials where the cooling or quenching effect of water or solutions containing water is the extinguishing factor. (Example: Frame constructions, overstuffed furniture, waste baskets.)
2. **CLASS B:** Fires of flammable liquids, greases, where air exclusion or blanketing is essential. (Example: Gasoline tank trucks, vats of cleaning solvent.)
3. **CLASS C:** Fires in electrical equipment where a non-conductive extinguishing agent is of first importance. (Example: Electric heaters, switchboards, transformer banks.)
4. **CLASS D:** Fires involving combustible metals such as magnesium, titanium, zirconium, sodium, lithium and potassium.
5. **CLASS K:** Deep fat fryers

FIRE TYPE

EXTINGUISHER TO BE USED

CLASS A	Soda Acid, Foam
CLASS B	Foam, CO2, Dry Chemical
CLASS C	CO2, Dry Chemical
CLASS D	Dry Chemical
CLASS K	Animal Fats Grease

DRILLS

Fire drills will be conducted annually. All critical personnel will be involved.



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FIRE ALARM PROCEDURES

Normal sprinkler heads will go off at 140 to 150 degrees. Warehouse sprinklers will go off at 250 to 260 degrees. If a fire and/or the odor of smoke is detected or if smoke or fire is visible to a Team Member or guest, the proper procedures will be as follows:

1. Sound the alarm by using the pull station alarm.
2. Go immediately to the nearest telephone and call:
 - a. Security Dispatch at: **(919)919-6083** and Surveillance at: **(919)919-6286**
 - b. Use radio security dispatch **channel 4** if there is a radio available.
3. Tell them who you are, where you are calling from, and the seriousness of the problem. The Security Department will investigate and take appropriate action and/or request additional assistance.
4. If no telephone is available, and you deem the situation an emergency, go to the nearest fire alarm pull station to activate it. There are pull stations at every exit and throughout the facility.
5. **NEVER YELL "FIRE!"**
6. If you can **SAFELY** return to the fire, and if you are trained, attempt to put out the fire using a fire extinguisher.
7. If the fire has grown beyond the beginning stage, wait in a safe area until Security, Facilities or Quapaw Tribe Fire Department arrives. Assist when possible in identifying location of the fire.
8. If the fire or smoke endangers your health and/or life or the lives of others, leave the area immediately, taking guests and other Team Members with you to a place of safety. Do not go back for personal property.
9. When Security, Facilities, or Quapaw Tribe Fire Department arrive on the scene, follow their instructions.
10. Do not talk to Media.



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FIRE EVACUATION GENERAL PROCEDURES

1. Continue to perform duties as normal.
2. When instructed by a senior staff member or alarm, proceed to the Valet parking lot ('A' Parking) and check in with your Supervisor.
3. It is imperative that Team Members do not talk to unauthorized persons or media personnel.
4. If an evacuation is ordered, this order will come from a member of the Executive Management Team, such as the General Manager or Assistant General Manager, designee, or the Director or Manager of Security. In the absence of the Executive Team member, the order to evacuate will come from the MOD, after conferring with the Security Manager or Supervisor and Facilities Supervisor. If time and the emergency permit, the MOD will coordinate the evacuation with either the General Manager, Assistant General Manager, or Director of Security. All Team Members, without exception, will be required to follow the instructions of the senior officers to eliminate as much confusion as possible.
5. Team Members and guests will exit out the nearest emergency exit and meet at the Flag Roundabout in front of the Hotels (Hotel and South Casino). All back of house and administrative building Team Members will evacuate to the West Team Member parking lot. All North Casino Team Members will move to the 'A' Parking lot. Under certain circumstances, we will move to the North edge parking lot and wait for further instructions from your Supervisor/department head.
6. Each Supervisor will supply the representative from Human Resources with a list of all Team Members accounted for from their department.
7. All Team Members must remain in their assigned assembly area pending further instructions from their Supervisor.
8. Interviews with any news media regarding the evacuation will be the sole responsibility of the General Manager, Assistant General Manager, Public Relations Manager or the Director of Marketing.

SPECIFIC DEPARTMENT PROCEDURES/RESPONSIBILITIES

SECURITY

Security Dispatch Procedures



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The Security Dispatcher will:

1. Receive both radio and telephone communication from the scene of the emergency.
2. Notify the Security Supervisor or Manager, MOD and a QTGA Compliance Agent of the alarm.
3. All Officers involved in the alarm response will be advised to go to the Emergency Channel set by Security Supervision. The Dispatcher must then monitor the Emergency Channel for emergency radio traffic and Security Channel 1 for normal Security activities.
4. Notify Facilities of the alarm and location. If advised that alarm is valid, the Dispatcher will call Quapaw Tribe Fire and/or Quapaw Marshalls and notify the Manager of Security. If a false alarm, advise all Security units to return to normal duties.
5. If the order to evacuate is issued, notify Teleservices (PBX).
6. After the alarm control panel has been reset, an Officer will be dispatched through the hotel to reset all of the magnetic fire doors, which automatically close when an alarm is activated in the hotel areas. While the Officer is resetting these doors, they will also be checking for any problems with the doors. Example: Door didn't release, magnet won't hold door open, or the door didn't close properly.
7. If the Supervisor responding to the scene of the alarm does not report to the Dispatcher within a reasonable amount of time as to their findings or they cannot be contacted by radio, it will be assumed that there is an actual fire. If a state of emergency exists, the Fire Department and/or Quapaw Marshalls will be called and asked to respond.
8. Maintain a log of:
 - a. Assignments of Security personnel to locations directed by the Shift Supervisor.
 - b. Facilities personnel on the scene.
 - c. Department heads on the scene.
 - d. Request for additional emergency assistance if necessary.
 - e. Establishing a first-aid station.



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- f. Issuance of two-way radios to essential personnel responding to the scene as directed.
- 9. Security Dispatch will notify the Tribal Fire Department regarding the nature of the problem/disaster.
- 10. At the direction of the Shift Supervisor, where the situation necessitates the need of additional Security manpower, a Security Officer will be directed to notify off-duty personnel to report as soon as possible to the Security Office for assignments.
- 11. The Security Dispatcher will dispatch available officers, room service personnel, bell service personnel, and housekeeping personnel to the area, in order to direct and assist guests. Someone will be posted at each stairwell exit. An available Security Officer will pick up a current copy of the Handicap listing from the Hotel front desk and these people will be evacuated first. Make sure that all guests have been awakened and are being evacuated. Security personnel assigned to the hotel will have a master key to open the doors to make sure rooms are all clear. Guestroom doors will be closed and marked with an "X" (Chalk is stored in fire extinguisher cabinets on each floor) after guests are evacuated. The Security Department will be responsible for the safekeeping of the evacuated guests' property to the greatest extent possible.

Command Center for Evacuations

- 1. If evacuation of guests becomes necessary, Security will establish a command center in the Administration Training and/or Conference Room. The Director of Security, General Manager, Assistant General Manager, Manager of Facilities, Director of Hotel Services, Director of Food & Beverage, and other key executives will assemble in this area. The Quapaw Tribe Fire Department Command Center may also be established in the Administration Training and/or Conference Room. The Security Office will be equipped with multiple phones, radios, and be supported by emergency power. Radio communications will also be established from the Emergency Command Center with departmental support staff as required. Should it be impossible to man this area due to damage, another location will be selected. Security Officers will contact all required attendees either in person or by some form of communication to advise of the location change.
- 2. The Assistant General Manager/General Manager/Designee will direct the following activities:
 - a. Activate the Emergency Command post and notify Surveillance.
 - b. Monitor and evaluate the situation and/order PBX announcements depending on the state of emergency.



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- c. Organize assistance teams within specific departments to provide direction and assistance to guests and Team Members.
 - d. Make public announcements as deemed necessary.
 - e. Provide appropriate information to the media.
 - f. Prepare plans to return to normal operations as soon as possible.
- 3. Security Dispatch ext 6083 will log all incident information.
 - 4. All Security telephone extensions will be given top priority by Teleservices (PBX) operators.
 - 5. In the event of communications failure, Security personnel will act as runners with messages to and from the Emergency Command Center.
 - 6. If necessary, all off-duty Security Personnel may immediately be called and/ordered to report to work in uniform.
 - 7. When a command center is opened, its function will be to install phones immediately.

Director of Security

- 1. It will be the responsibility of the Director of Security, if available, to evaluate the situation and determine the extent of security staffing required throughout the property to protect life and property.
- 2. If armored car support is required to provide adequate security coverage for currency, records, etc. it will be the Director/Manager of Security responsibility to request such support from Loomis.

Security Manager

- 1. The Security Manager will take whatever action is appropriate to provide adequate staffing. If the Security Manager is not available, the Security Supervisor will fulfill these duties.
- 2. Ensure that all Team Members are notified to evacuate their area. Contact the Director of Security and advise that an evacuation has been ordered.
- 3. Have Team Members leave by the closest exit and report to the Valet parking lot.



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4. Ensure that all on duty Team Members are accounted for.
5. Report to the Director/Manager of Security to advise them of members accounted for. If the Director/Manager of Security is not available, report to Security Manager on Duty.

Officers

1. Security Officers assigned to the casino floor will be responsible for checking areas such as dressing rooms, dining rooms, break rooms, guest rooms, and/or any kitchen, insuring that all guests and personnel have been evacuated and marking those areas with chalk by placing an "X" on the door. Chalk can be located in the fire extinguisher boxes on each level.
2. Officers will make every effort to keep fire doors between stairways and floors closed to prevent drafts. They will also be responsible for prohibiting unauthorized persons from entering restricted areas.
3. Team Members should move to the Valet parking lot, then locate and report to their supervisor.
4. Security Officer in Patrol when responding to an alarm at the Learning Center will assist in getting all Team Members and children out of the Learning Center.
5. If all Team Members and children are out of the Learning Center, we will wait for Quapaw Fire/EMS to give the all clear.
6. In the event the Learning Center building is closed, Security will wait outside until Quapaw Fire/EMS has given the all clear.
7. Security Officer in Patrol when responding to an alarm at the Q-Store will assist in getting all Team Members and guests out of the Q-Store.
8. If all Team Members and guests are out of the Q-Store we will wait for Quapaw Fire/EMS to give the all clear.
9. In the event the Q-Store building is closed, Security will wait outside until Quapaw Fire/EMS has given the all clear.



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Security Shift Supervisor

Upon receipt of information alleging a fire, the Security Dispatcher will notify the Shift Supervisor by radio of the situation. The Supervisor will:

1. Obtain the necessary keys which will be utilized in the event evacuation is required of the guests.
2. Upon arrival at the scene, the Shift Supervisor will inform Security Dispatch of their findings and request additional personnel and assistance if required.
3. If the condition is unfounded, the Shift Supervisor will inquire if any additional information and/or complaints have been received in the interim or if the alarm control board has been activated.
4. If positive, continue to maintain and/or control the situation until the arrival of the Quapaw Tribe Fire Department.
5. A Security Officer will be dispatched to meet the unit and direct the personnel to the location of the emergency.
6. Evacuation, if necessary, will be initiated by the Manager on Duty after conferring with the Security Supervisor and the Facilities Supervisor.
7. Contact the following:

		Office	Cell
Assistant General Manager	Jani Cummings	(918)919-6230	(918)919-9795
Assistant General Manager	Ernie Dellaverson	(918)919-6232	(860)460-1089
Director of Security	Bill Goodwin	(918)919-6080	(918)919-9097
Risk Manager	Linda Shipman	(918)919-6263	(918)919-9976
Director of Construction	Ernie Caruthers	(918)919-6095	(918)541-8731
Director of Hotel	Bob Bergquist	(918)919-6150	(918)919-9794

8. Assign additional officers with mobile radios to the concerned area to keep guests and Team Members calm and orderly throughout the evacuation process.
9. Elevators will not be allowed to be used until conditions are secured by the Quapaw Fire Department.



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10. Upon completion of the evacuation from the concerned areas and the Quapaw Fire Department advises the location is safe, a Security patrol will be assigned to protect the facility, Team Members and guests' property. Other Team Members will offer assistance and comfort to the guests.

FACILITIES

Manager/Supervisor

Facilities will be notified of the emergency by Security Dispatch or Surveillance. Upon receipt of the information, they will respond to the area indicated and assist in:

1. Securing areas.
2. Ensure that all doors, windows, laundry chutes and ventilation are secured to prevent draft from spreading fire.
3. Ensure that all Team Members are notified to evacuate their area.
4. Team Members should leave by the closest exit and report to the Valet parking lot.
5. Ensure that all on duty Team Members are accounted for.
6. Ensure that all sensitive keys are collected from Team Members.
7. Report to the Director of Facilities (or next manager in line) to advise them that all Team Members are accounted for.

Facility Team Members

1. If possible, ensure all gas and electricity is turned off if applicable.
2. Inform patrons "At this time we are closed for business and request all persons leave this area." Give directions to the nearest exit. Assist the evacuation of guests and Team Members from those floors directly involved via fire stairwells.
3. Team Members should move to the Valet parking lot, then locate and report to their supervisor.

SURVEILLANCE

Surveillance Supervisor/Lead



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1. Ensure that all Team Members are notified to evacuate their area. Contact Surveillance Manager and advise that an evacuation has been ordered.
2. Ensure that all cameras and recording equipment are up and recording. Ensure that the door to the Surveillance room is locked.
3. Have Team Members leave by the closest exit and report to the Valet parking lot.
4. Ensure that all on duty Team Members are accounted for.
5. Report to Surveillance Manager that Team Members are accounted for. If the Surveillance Manager is not available, report to Manager on Duty.

Surveillance Operators

1. Ensure that all cameras and recording equipment are up and working.
2. Lock and secure door to Surveillance room. Take radios and batteries.
3. Team Members should move to the Valet parking lot then locate and report to their Supervisor.

HOTEL EVACUATION PROCEDURES

1. The order to evacuate the Hotels will come from the Manager on Duty, after conferring with the Security Manager or Supervisor, Hotel Manager/Supervisor and Facilities Supervisor. If time and the emergency permit, the Manager on Duty will coordinate the evacuation with either the General Manager, Assistant General Manager or Director/Manager of Security.
2. Each guest room is posted with an instructional card and evacuation route; each floor is posted to inform guests - IN CASE OF FIRE DO NOT USE ELEVATORS.
3. The estimated severity of an occurrence and the extent to which emergency procedures are implemented will rest with the Security Manager or Supervisor, Manager on Duty and the Facilities Supervisor on duty at the time. All other Team Members, without exception, will be required to follow the instructions of the senior officers to eliminate as much confusion as possible.
4. When it is mandatory to evacuate guestrooms and a room cannot be entered due to the "dead bolt" being in position, or the guest cannot be awakened, Security Officers or engineers shall gain access by whatever means necessary.



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5. When possible, Security Officers will be stationed at the top and bottom of the stairwells with radios. These officers will act as a line of communication with guests and Team Members. They will also assist in the evacuation and in the prevention of thefts from unoccupied rooms, if possible.

Hotel Manager OR Assistants' Procedures

Upon receiving notification of an emergency, the Hotel Manager or assistants will:

1. Notify the Front Desk Agents.
2. Assist in the evacuation of guests, if it becomes necessary.
3. Ensure that Team Members not needed in evacuation secure their stations and exit to the Valet parking lot.

Hotel Office Front Desk Agent's Procedures

1. Notify Valet Supervisor (918)541-6088 of the situation.
2. Assure guests that the emergency is being investigated.
3. Assist Hotel Manager and Security as requested.
4. Run 4 copies of the occupied room list (by room number). Give 1 copy to the Hotel Manager, 1 copy to Teleservices (PBX), 1 copy to Manager on Duty and 1 copy to Security.
5. Ensure that all sensitive papers are secured. Lock and secure door if applicable.
6. Team Members should move to the Valet parking lot, then locate and report to their Supervisor.

Teleservices (PBX)

1. In case of a fire, an automatic announcement will page over the public address system. If a fire is burning in the facility, the Security Manager or Manager on Duty will make a decision whether or not to evacuate the building. The Security Manager or Manager on Duty will notify PBX when to make an evacuation announcement.



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2. If the Fire System is **conducting a test**, an announcement will be made similar to the following: "This is a fire system test. There is no need to panic. Please be patient."
3. If the fire alarm is **actually going off**, the same procedures will be followed as a regular alarm but an announcement, if it is decided by a Security Supervisor, will be similar to the following: "Please listen to the public address system for instructions." Then give an announcement as ordered by the Security Supervisor.
4. If an evacuation is ordered, the message will be similar to the following: "Please move carefully to the nearest exit and follow the instructions of Downstream personnel at the doors."
5. Teleservices (PBX) will be notified by the Security Dispatch to telephone guest rooms on the floor of the emergency as well as the floor above and below, or as directed by Quapaw Tribe Fire Department. The Teleservices (PBX) operator will activate a pre-recorded message for evacuation or will state: "There is an emergency, please depart your room by the nearest designated exit. Do not use the elevators. The nearest exit is shown on the diagram located on the back of "your door." Use the occupancy list printed by the front desk to call all guest rooms allowing 4 rings. If the evacuation is because of fire, begin with the affected floor, then the floor above, the floor below, and start from the top floor ascending down.
6. Any room in which a guest does not answer the phone, highlight and call a second time after all rooms are called.
7. Stay and direct calls as long as the situation is safe.
8. Team Members should move to the Valet parking lot, then locate and report to their Supervisor.

FOOD AND BEVERAGE/CONVENTION CENTER

F & B Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area. Special attention should be made to ensure that special needs or disabled Team Members are notified.
2. Contact the appropriate Team Members to ensure all funds have been secured.
3. Have Team Members leave by the closest exit and report to the Valet parking lot.



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4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to the Food and Beverage Director and/or next manager in line to advise them all Team Members are accounted for.

Kitchens

1. Turn off all stoves and/or electrical equipment.
2. If safe to do so, check all walk-in-boxes, freezers, and dish washing areas for personnel and secure before leaving. Account for hearing-impaired Team Members during this process.
3. Remove all carts from hallways and exits.
4. Team Members should exit out the nearest safe exit and move to the Valet parking lot.
5. Team Members should then locate and report to their supervisor.
6. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

Restaurants/Food/Drink Outlets

1. Place all monies in register and lock drawers.
2. Inform patrons "At this time we are closed for business and request all persons to leave this area." Give directions to nearest exit.
3. Team Members should exit out the nearest safe exit and move to the Valet parking lot.
4. Team Members should then locate and report to their supervisor.
5. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

MAIN BANK

1. Place all funds in drawer, close and lock drawers and turn keys over to the Supervisor.



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2. Notify Surveillance that Team Members are leaving the Main Bank, if possible.
3. Pull down and secure roll down door.
4. Team Members should exit out the nearest safe exit and move to the north parking lot.

COUNT ROOMS

1. Secure all funds and important records/documents in metal boxes and place in drop box cabinets.
2. Shut down all equipment.
3. Notify Surveillance at: (918)919-6280 that Team Members are leaving the Count Room, if possible.
4. Team Members should exit out the nearest safe exit and move to the north parking lot.
5. Team Members should then locate and report to their supervisor.
6. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

ADMINISTRATION BUILDING

1. If time and the emergency permit, the Manager on Duty will coordinate the evacuation with the General Manager, Assistant General Manager or Director/Manager of Security.
2. The order to evacuate the Tribal Gaming Agency portion of the Administration Building will come from the Quapaw Tribal Gaming Agency.

FINANCE DEPARTMENT MANAGER/SUPERVISOR

1. Ensure that all Team Members are notified to evacuate their area.
2. Have Team Members leave by the closest exit and report to the west Team Member parking lot.
3. Ensure that all on duty Team Members are accounted for.
4. Ensure that all sensitive keys are collected from Team Members.



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5. Report to Chief Financial Officer and/or next manager in line to advise him/her all Team Members are accounted for.

PURCHASING

1. Ensure that all important papers are secured. Lock and secure door if applicable.
2. Team Members should move to the west Team Member parking lot, then locate and report to their supervisor.

WAREHOUSE

1. Ensure that warehouse is secured so merchandise and stored items will not be accessible to others.
2. Ensure that all important papers are secured. Lock and secure door if applicable.
3. Team Members should go to the west Team Member parking lot to locate and report to their supervisor.

EGM DEPARTMENT

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Contact the appropriate EGM Team Members to ensure all funds in their possession have been returned to the Cage or secured by the EGM shift supervisor depending upon what time allows.
3. Have EGM Team Members leave by the closest exit and report to the Valet parking lot.
4. Ensure that all on duty EGM Team Members are accounted for.
5. Ensure that all sensitive keys are collected from EGM Team Members.
6. Report to Gaming Operations Director and/or EGM shift supervisor to advise them all EGM Team Members are accounted for.

EGM Attendants



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1. Lock and secure change cart in Cage, if possible, and retain the keys.
2. Inform patrons "At this time we are closed for business and request all persons leave this area." Also advise them that chips/tokens/tickets may be cashed in later and give directions to the nearest exit.
3. EGM Team Members should move to the Valet parking lot, then locate and report to their supervisor.
4. If an EGM Team Member has sensitive keys, they should be turned over to the supervisor or manager.

TABLE GAMES

Manager/Supervisor

1. Ensure that all Table Games Team Members are notified to evacuate their area.
2. Ensure all funds have been secured and the covers are locked on the tables.
3. Have Table Games Team Members leave by the closest exit and report to the Valet parking lot.
4. Ensure that all on duty Table Games Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Table Games Team Members.
6. Report to Table Games Manager (and/or next manager in line to them) that all Table Games Team Members are accounted for.

Dealers

1. Lock and secure cover on table and retain the keys.
2. Inform patrons "At this time we are closed for business and request all persons to leave this area." Also advise them that chips/tokens may be cashed in later and give directions to the nearest exit.
3. Team Members should move to the Valet parking lot, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.



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HOUSEKEEPING

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Have Team Members leave by the closest exit and report to the Valet parking lot.
3. Ensure that all on duty Team Members are accounted for.
4. Ensure that all sensitive keys are collected from Team Members.
5. Report to the Director of Hotel Operations or next manager in line to advise them that all Team Members are accounted for.

Public Area Attendants

1. Push all carts and other equipment into storage areas and out of hallways/pathways to assist in a safe and prompt evacuation.
2. Inform patrons "At this time we are closed for business and request all persons to leave this area." Give directions to the nearest exit.
3. After the property has been either totally or partially evacuated, hotel Team Members, under the direction and guidance of the Director/Manager of Security or designee, will ensure the following:
 - a. A sweep of all guestrooms will be made to ensure that all guests have been evacuated from the property. Special emphasis shall be given to occupied handicapped rooms.
 - b. All Team Member areas will be double-checked to make certain they are completely evacuated.
 - c. All maintenance department areas, hallways, stairwells, linen rooms, housekeeping section, and roof areas will be double-checked to make certain they are completely evacuated.
 - d. Team Members should move to the Valet parking lot, then locate and report to their supervisor.

VALET DEPARTMENT



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Manager/Supervisor

1. Clear entrance of all vehicles.
2. Assist Security Officer in keeping main entrance clear for emergency vehicles unless otherwise instructed.
3. Ensure that all Team Members are notified to evacuate their area.
4. Team Members should move to the Valet parking lot, then locate and report to their supervisor.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Director of Hotel Services or next manager in line to advise them that all Team Members are accounted for.

Valet Team Members

1. Lock and secure all funds in register, close and lock drawer containing guests' car keys and retain the keys.
2. Inform patrons "At this time we are closed for business and request all persons leave this area."
3. Team Members should move to the Valet parking lot, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor.

PLAYERS CLUB/Q-CLUB

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Contact the appropriate Team Members to ensure all important documents have been secured.
3. Have Team Members leave by the closest exit and report to the Valet parking lot.
4. Ensure that all on duty Team Members are accounted for.



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5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Marketing Manager or next supervisor in line to advise them that all Team Members are accounted for.

Players Club/Q-Club Team Members

1. Place all sensitive documents in drawer, and close and lock drawers and retain the keys.
2. Inform patrons "At this time we are closed for business and request all persons leave this area." Give directions to the nearest exit.
3. Team Members should move to the Valet parking lot, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

Downstream Learning Center

1. Ensure that all sensitive papers are secured.
2. Turn off all stoves and/or electrical equipment.
3. If safe to do so, check all walk-in-boxes, freezers, and dish washing areas for personnel and secure before leaving. Account for hearing-impaired Team Members during this process.
4. Contact Security at extension **6083** if possible.
5. Gather all children and Team Members and proceed to the nearest exit.
6. Team Members should move to the Team Member parking lot, then locate and report to their supervisor.
7. Verify all Team Members and children are safe and accounted for.

Quapaw –Q Store

1. Place all monies in register and lock drawers.



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2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area." Give directions to nearest exit.
3. All fuel pumps should be deactivated.
4. Team Members should exit out the nearest safe exit and move to the RV parking lot.
5. Team Members should then locate and report to their supervisor.

Nee Spa

1. Place all monies in register and lock drawers.
2. Inform all patrons "At this time, we are closed for business and requesting all persons to leave this area." Give directions to nearest exit.
3. Once all patrons have exited, Team Members should exit out the nearest safe exit and move to the valet parking lot.
4. Team Members should then locate and report to their supervisor.

Ma-Ko-Sha Pastry and Coffee Shop

1. Place all monies in register and lock drawers.
2. Inform all patrons "At this time, we are closed for business and requesting all persons to leave this area." Give directions to nearest exit.
3. Once all patrons have exited, Team Members should exit out the nearest safe exit and move to the valet parking lot.
4. Team Members should then locate and report to their supervisor.

POINTS TO REMEMBER IF/WHEN EVACUATION IS ORDERED

1. Never do anything to cause panic.
2. Listen for and heed instructions given by the Hotels/casino staff and Fire Department.



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3. Use fire extinguishers or other fire-fighting equipment **ONLY** if trained by proper authorities **AND IT IS SAFE TO DO SO.**
4. Evacuate all floors of the hotels if needed.
5. **DO NOT** use the elevators.
6. **DO NOT RUN**; remove high-heeled shoes, if necessary.
7. The stairwells and corridors must always be clear of any articles that block passages. Exit doors must not be stuck or locked. Security monitors (or designees) will be stationed at each exit along the stairwells to direct people to the right exits, safety areas, and the streets.
8. **DO NOT SMOKE.**
9. When stairwells become congested, allow people to make an alternate entry into the flow of traffic at each exit.
10. Use stairwell handrails, moving to the right-hand side if emergency crews are encountered.
11. Searches must be conducted to make certain that all persons have been evacuated. Place an "X" on areas checked with a piece of chalk to identify the area/room was checked. (Chalk is located inside each fire extinguisher box.)
12. **DO NOT** tamper with the air conditioning system during a fire. Facilities personnel will make certain that the system is properly controlled.
13. **NEVER** use water on grease, gas, or electric fire.
14. **NEVER** open a door that feels hot.
15. If you have to enter a room filled with smoke, **always** stay low and close to the ground. If guests advise you that there is considerable smoke, inform guests to keep their doors closed and stuff wet towels or other linen around the cracks of the door. **DO NOT OPEN WINDOWS.**
16. Close all doors as you evacuate. Guests should be advised to take their room keys with them and close doors behind them as they leave.



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17. Assist those who are slower in moving or in any way physically challenged.
18. Watch for guests who might have carbon monoxide poisoning:
 - a. A flushed look and appearing as if intoxicated.
 - b. The person must get fresh air as soon as possible.
19. When guests are trapped in their rooms and call for help, tell them to follow these instructions:
 - a. Stay calm and keep your room key in your pocket.
 - b. Stuff door cracks with wet blankets or towels.
 - c. Hang light colored material on the window to attract attention for rescue; **DO NOT OPEN OR BREAK THE WINDOWS** unless the air in the room becomes unbearable.

PEOPLE WITH DISABILITIES

1. All occupied handicap rooms will be given top priority for evacuation due to the guests special evacuation needs.
2. Always ask someone with a disability how you can help before attempting any rescue technique or giving assistance.
3. Ask whether there are special considerations or items that need to come with them.

Blindness or Visual Impairment

1. Speak to the person in a calm, clear voice in order to keep the person calm.
2. Team Members should offer to lead the person to a place of safety.
3. Give verbal instructions including directions, estimated distances and any obstructions they may encounter.
4. Do not grasp a visually impaired person's arm. Ask them to hold onto your arm as you walk, especially if there is debris or a crowd.



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Deafness or Hearing Loss

1. Get the attention of a person with a hearing disability by touch or eye contact. Clearly communicate the problem to them. Gestures and pointing may be helpful, but be prepared to write a brief statement if the person does not seem to understand.
2. Team Members should offer to lead the person to a place of safety. If the person refuses, offer visual instructions to advise of the safest route or direction by pointing toward exits or a safe area.

Mobility Impairment

1. If people with mobility impairments are unable to exit, they should be moved to a safer area such as most stairwells or an office with the door closed which is a good distance from the hazard.
2. Notify Security, or Fire personnel immediately about any persons remaining in the building and their locations. They will decide whether people are safe where they are and will evacuate them as necessary.

POST EVACUATION PROCEDURES

Immediately After the Emergency

1. The Risk Manager and Incident Commander will assemble the recovery team consisting of contractors and outside services. The team will be instructed to ensure safety of personnel on the property, assess remaining hazards, identify potentially hazardous areas in the building and document any damage by taking photographs or video. If necessary or applicable, the Risk Manager will keep all receipts for equipment purchased or work performed.
2. The property is to be protected by closing building openings, removing smoke, water, and debris. Restore power to utilities as soon as it is safe and conduct an investigation with either the insurance representative, or an appropriate agency. The insurance representative will be called immediately after the emergency. The "area" should not be cleaned up before it has been photographed and well documented.
3. Team Members should not leave their assembly areas until the Manager on Duty (after conferring with the Security Supervisor and Facilities Supervisor) has determined the next course of action and has given the "all clear" to leave the assembly area. The Risk Manager/Incident Commander will meet with the Fire and/or Police to determine the extent of the damage and will either have the Team Members return to the building or release them to go home.



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Returning To the Property

1. The Fire Department will inspect the building for safety issues. The Risk Manager/Incident Commander will communicate the situation to the evacuated personnel.
2. Do not allow Team Members to reenter the building until the Risk Manager and Incident Commander, or the Police/Fire Department has declared the building safe.
3. Before Team Members can return to the building, appropriate steps will be taken to correct the emergency.
4. Depending on the extent of damage, the Security Officer or Fire/Police will escort the Team Members back to the building to assess which goods, possessions, or equipment need to be retrieved and if necessary, to arrange for such retrieval at a later time. Care should be given to observe unfamiliar odors and noise, which may indicate a hazardous condition.
5. A guard will be posted by Security to observe the building once it has been evacuated and emergency personnel have left the premises. Damaged properties present an opportunity for looting. Security will require proof of identification before allowing any unfamiliar people to enter the building. A current list of the Team Members allowed back into the building should be given to the security guard by the Incident Commander.
6. If the Team Members cannot return to the building, it is up to the Risk Manager to call the restoration contractor to come in to secure the building.
7. The primary responsibility of Team Members once the danger has passed will be to resume normal business operations as soon as possible.

RESPONSIBILITIES

General Manager or Assistant General Manager

The General Manager or Assistant General Manager will designate those persons for whom attendance is mandatory. The debriefing should be attended by, at a minimum, the Manager on Duty, Security Supervisor and Facilities Supervisor who initiated the evacuation. The debriefing should be open to all Leadership Team Members desiring to attend.

Director of Hotel Services



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1. Ensure that supervisors collect all sensitive keys from Team Members.
2. Contact the appropriate manager(s) to ensure all funds have been secured in soft count, hard count, main bank, casino cashier cage, table game covers, restaurant areas, retail and valet.
3. If the situation appears to continue for some time or there is inclement weather, the Manager on Duty or designee will attempt to locate a sheltered area to house Team Members.
4. Assign an upper management Team Member to establish a liaison with all off duty Team Members. He/she will give updates on the situation and on decisions concerning Team Members being sent home.
5. Assign a Human Resource Representative to make sure all Team Members are accounted for and to check on needs of Team Members.
6. If a Team Member is injured, assign an upper management Team Member until a HR Representative can respond to monitor and assist the injured Team Member(s), and notify a family member if necessary.
7. If a Team Member is killed, immediately assign an upper management person along with a HR representative to personally notify and provide care for family.
8. Contact the Manager of Facilities or Team Member next in line to start coordinating clean-up efforts and contacting off duty Team Members to come to assist.
9. Contact the Director of Food & Beverage, if necessary, for food preparation for Team Members and/or guests.
10. Ensure contact is made with appropriate utility company Empire District Electric Company if service was interrupted because of the evacuation.
11. Ensure adequate PBX operators are present to handle calls and ensure IT is on the scene to forward phone system to a new location if necessary.

SECURITY

Security Manager's Responsibility



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1. Ensure that after the fire is out and the emergency is over, these procedures will take effect for returning the building to operating condition.
2. Security of damaged area.

Director of Security Responsibilities

A post-evacuation debriefing should be held within 7 days of the evacuation to determine what was done successfully and if any changes to the procedure should be made. The Director of Security is responsible to follow up on changes recommended at the debriefing.

QAUPAW TRIBE FIRE DEPARTMENT'S RESPONSIBILITIES

1. The return to occupancy of the building and reactivation of fire protection/detection system is the responsibility of the Quapaw Tribe Fire Department.
2. No post-fire operations will be investigated until approved by Quapaw Tribe Fire Department Chief.
3. The Executive Team shall be notified as to the cause of the fire and damage to structure as soon as possible.

FACILITIES RESPONSIBILITIES

1. Before any equipment is restarted, it will be checked by a Facilities Team Member or other individual qualified to determine safety of equipment. The Director of Construction will examine the building for structural stability and safety prior to occupancy of the building.

RISK MANAGER'S RESPONSIBILITIES

1. The Risk Manager will contact the Gallagher insurance company at 1-253-627-7183.
2. If an insurance representative arrives on the scene, do not allow them to do an assessment until authorized by the Assistant General Manager, Jani Cummings (918) 919-6230 Office / (918)919-9795 Cell or Ernie Dellaverson (918) 919-6232 Office / (860) 460-1089 Cell.
3. After the insurance company has been notified and authorized on scene by the General Manager or Assistant General Manager, the insurance company's procedures will be complied with. No clean up is authorized until notification or authorization is received from the insurance representatives and the fire scene has been released by the Quapaw Tribe Fire Department Chief.



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4. Document the damage with pictures.

FIRE CHECKLIST

Within The Building

1. Sound Fire Alarm and evacuate. Pull alarms are located at each exit.
2. Notify the Police and Fire Department (911).
3. Confine the fire by closing all doors during the evacuation.
4. The Facility Manager or Safety Coordinator will secure electrical power and natural gas as indicated.
5. Manager on Duty and Security will sweep the building to ensure that everyone evacuates.
6. Manager on Duty and Security will have received fire extinguisher training and will fight incipient stage fires if reasonable to do so. (This should be done only to the level that people have been trained. Always have your back to an EXIT. Never risk injury or loss of life. Evacuation is advised.)
7. PRIMARY ASSEMBLY POINT: Primary assembly point is the west end of main parking lot.
8. ALTERNATE ASSEMBLY POINT: Alternate assembly point is the north parking lot across the road.
9. During periods of inclement weather, when evacuations are expected to last for some time, a decision will be made by the Incident Commander to move Team Members to an alternate location.
10. Supervisors will report missing Team Members to the evacuation coordinator, Safety Coordinator or Incident Commander. Those not found will be reported to Fire and Law Enforcement Officials upon arrival.
11. Assist emergency personnel in locating and assisting injured persons. Follow instruction of emergency response personnel.
12. The Incident Commander or designated representative will log all activities and decisions and monitor all radio communications.
13. The Incident Commander will allow Team Members and visitors to re-enter the building only after Fire Department Officials have declared the facility as safe.



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14. The Risk Manager will maintain a list of hospitalized persons and their location.

15. Contact Maintenance or the Facility Department for repairs and barricades.

Fire near the Building

1. Notify appropriate Fire Department at 911 to be sure the fire has been reported.
2. Local Fire officials will determine the need to implement any action. If there is a danger of spreading to the building, evacuation will be conducted immediately.



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CHAPTER 2 - ALARM PROCEDURES

ALARM POLICY AND PROCEDURES

This policy has been established to ensure a smooth and effective response to any alarm by establishing specific duties and responsibilities of the affected departments.

These are general overall standard operating procedures to be used in the event of alarm activation. When an alarm is activated, an audible alarm and a light will show on the alarm control panel in Security and also in the alarm control panel at the Security Post 3.

FIRE ALARMS

FACILITIES DEPARTMENT

1. The Facilities Department is responsible for all technical aspects of the system, including repairs and upkeep.
2. Assigned Facilities personnel will respond to the troubled area and meet with a Security Supervisor. Facilities and Security will investigate the area to determine the validity of the alarm and report their findings to Security Dispatch and Surveillance.
3. If a valid alarm, emergency procedures will be placed into effect.
4. If it is determined to be a false alarm, Facilities will try and determine the cause.

SECURITY DEPARTMENT

The Security Department will respond to alarms, oversee emergency procedures if activated and assist the Quapaw Tribe Fire and/or Quapaw Marshalls if called onto the property. Security's prime responsibilities are the safety of guests and Team Members and the protection of property.

Security Supervisor

1. The alarm is programmed with an automatic three minute delay at the casino level and four minute delay at hotel level two and above, allowing time for an investigation into the cause of the alarm prior to audio and visual alerts being activated throughout the facility. A Security Officer or Security Supervisor will go to the problem area. After a quick look and conference with Surveillance, the Security Supervisor will authorize the silencing of the alarm, if appropriate, or allow the audio and



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visual activation to occur. There will be a signal light flashing on the panel (acknowledge). This button will be pushed first. Then the alarm button will be pushed to silence the alarm. The Security Supervisor will also fill out an Incident Report if there is an actual incident or the alarm triggers 3 times. If it triggers 3 times in a row there is a system problem.

2. To reset the alarm, push the alarm reset button in the upper left side of the control panel. This button will have a steady red light. If the alarm was triggered by a pull station, that pull station must be reset before the system will allow you to reset the fire control panel.
3. The alarm will only be reset on the orders of the Security Supervisor or Manager.
4. If the alarm was triggered by a tamper (water turned off), contact Facilities at: (918)919-9547. The alarm can be silenced but not reset until Facilities has fixed the water problem.
5. If a sprinkler head is damaged or has been knocked off, the fire alarm panel cannot be reset until the problem is fixed by Facilities.
6. If the alarm is going off in the administrative building, the alarm will not trigger the alarm in the main casino.
7. If determined to be a false alarm, notify Security Dispatch to cancel alert and turn situation over to Facilities, as the problem is now technical in nature.
8. If a valid alarm, take command of the situation and Facilities will move to an advisory position. Place emergency procedures into effect; take all appropriate actions necessary until Quapaw Fire or Quapaw Marshalls arrival.
9. Upon Quapaw Fire or Quapaw Marshalls arrival, you will relinquish control of the building to them, move to an advisory position and supply all assistance and support requested.
10. The fire phone will be in the Dispatch office in a red box just left of the main fire control panel. These phones are to be used by the Fire Department only. They have plug in stereo type jacks. There are fire phone plugs in the elevators and several places throughout the facility including Facilities.

Security Officers

1. Respond to alarm area, validate alarm and location and advise Security Dispatch of the situation.



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2. If a fire is located and the Security Officer has been trained in the use of a fire extinguisher, the Security Officer may attempt to put out the fire. If it is not possible to put out the fire, wait in a safe area until the Security Supervisor, Facilities or Quapaw Tribe Fire Department arrives. (See Fire Procedures Chapter for specific duties)
3. If false alarm, notify Security Dispatch and the Security Supervisor. If a valid alarm, notify Security Dispatch and the Security Supervisor and await arrival of Tribal Fire and/or Quapaw Marshalls. Once the Quapaw Tribe Fire or Quapaw Marshalls is on the scene, relinquish control and assist as needed.
4. If any technical problems occur or reset cannot be accomplished, notify Facilities for assistance.

SURVEILLANCE

1. If a fire alarm activates, notify Security Dispatch and Facilities of the nature and location of the fire.
2. Surveillance will monitor all response activities from alarm activation until the incident is completed.
3. It is the responsibility of Security to reset the alarm after it has been determined to be a false alarm or the fire has been extinguished.

PANIC ALARMS LOCATIONS

Cage: Window #2, 3, 4, 5, 6, 7, Poker Cage Window

Table Games: Pit 1, 2, 3, 4

Security: Post #1, 2, 3

Retail: Buffalo Grill Register, Gift Shop Register, Hotel Lobby Front Desk, WaNaBeDea Register, Spring River Register

Other: Q-Club Desk, Wardrobe Department, Human Resources, Marketing Administration Hall, Food and Beverage Office, Learning Center

Q-Store: Registers, Drive-Up Window, Supervisor Office

SURVEILLANCE

Surveillance Operator



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Upon activation of a panic alarm, the operator will ensure proper camera coverage on the area of activation and contact Security immediately for investigation. Operators may advise responding Security personnel of the audio/visual they are receiving from the area if the Security Officers are not on scene.

SECURITY

Security Dispatch

1. If advised that alarm is valid, the Dispatcher will call Quapaw Marshalls and notify the Director of Security.
2. If a false alarm, advise all Security units to return to normal duties.

Security Supervisor

1. Respond to alarm location and determine the validity of the alarm.
2. If determined to be a false alarm, notify Security Dispatch to cancel the call.
3. If a valid alarm, notify Security Dispatch. If a robbery is in progress, request Quapaw Marshalls be notified and then observe without interfering. Take any appropriate actions necessary to protect guests and Team Members until Quapaw Marshalls arrival.
4. Upon Quapaw Marshall's arrival, you will relinquish control of the situation to them, move to an advisory position and supply all assistance and support requested.

Security Officers

1. Respond to alarm area, validate alarm and location and advise Security Dispatch of the situation.
2. If a robbery is in progress, stay out of sight of the suspect(s) and observe as much as possible.
3. Do not interfere or take any action to apprehend the suspect(s).
4. If false alarm, notify Security Dispatch and the Security Supervisor.

EMERGENCY DOOR ALARMS

When an emergency door alarm is activated Security will evaluate the alarm.



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Security

Security will check the door, secure as necessary and or investigate the cause of the activation.



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CHAPTER 3 - ELEVATOR EMERGENCY

ELEVATOR EMERGENCIES

It is the responsibility of the Manager of Facilities to check all emergency elevator phones for proper operation and maintenance at least monthly. Upon receiving an emergency call from either the problem elevator or other parties, the following procedures will be carried out:

Security Responsibilities

1. Control the crowds around the emergency.
2. Attempt contact with persons inside.
3. Security Supervisor will be at the elevator when opened and assist guests in any way possible.

Facilities Responsibilities

1. Contact David Herrington at Otis **(918)588-9828** office or **(918)519-3496** cell and have them respond to the scene.
2. Ascertain the vertical location of the elevator.
3. If it is NOT between floors, attempt to open the doors.
4. Assist Security in attempting to contact individuals inside the elevator. After the elevator is cleared, secure it from being used until it has been cleared in writing by the Elevator Service Company.

NOTE: AT NO TIME SHOULD ANYONE, EXCEPT THE ELEVATOR COMPANY ATTEMPT TO CONTROL THE MOTION OF THE ELEVATOR. AT ALL TIMES THE EMERGENCY IS TO BE TREATED AS IF THERE WERE INDIVIDUALS IN THE STRICKEN ELEVATOR.

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CHAPTER 4 - BOMB THREATS

1. Statistics indicate that less than one percent of all bomb threat calls have resulted in found bombs. Unfortunately, bomb threats do exist and for the safety of all concerned each and every bomb threat must be treated under a formatted policy until proven groundless.
2. The persons most likely to receive a bomb threat by telephone will be Teleservices (PBX) which will provide the Emergency Command Center with a completed "Bomb Threat Checklist".

NOTIFICATION CALL

1. Upon receipt of a bomb threat, the Team Member receiving the call shall immediately notify Security and complete the "Bomb Threat Checklist". It will be the responsibility of Security to notify management, as indicated on the matrix notification on page 4 of this program.
2. A Teleservices (PBX) operator receiving any threats will attempt to do the following:
 - a. Keep the caller on the line as long as possible and ask that the message be repeated and if possible record every word spoken by the caller. If at least one other operator is on duty, signal that operator so that immediate effort can be made to initiate a trace on that call.
 - b. Try to obtain the location of the bomb and the time of detonation.
 - c. Inform the caller that since the building is occupied, the detonation could cause death or serious injury to many innocent people.
 - d. Note background noises which might be helpful in locating the place or type of place from which the call is made. Note details about the caller, such as sex, voice quality, speech impediment, accent or other expressions associated with particular occupations or regions and state of sobriety or mental agitation.
 - e. When/if instructed to do so by Security or as directed by Quapaw Tribe Fire Department, activate the emergency evacuation announcement or make the announcement manually.
 - f. If the evacuation includes the hotel, use the occupancy list printed by the front desk to call all guest rooms allowing 4 rings. If the evacuation is because of fire begin with the affected floor, then the floor above, the floor below, then start from the top floor ascending down.

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- g. Any room in which a guest does not answer the phone, highlight and call a second time after all rooms are called.
- h. Stay and direct calls as long as the situation is safe as directed by Emergency Command Center.

LEVELS OF BOMB THREATS

There are four levels of action to take in the event of a bomb threat.

1. LEVEL ONE –

- a. Take minimal action because of the nature and content of the threat.
- b. Operations continue as normal and a cursory search by Security Officers should be conducted in common areas.

2. LEVEL TWO –

- a. The nature of the threat warrants formation of a special search team.
- b. Keep the threat confidential and instruct the search team to quietly conduct a search of critical and specific areas.
- c. Operations continue as normal.

3. LEVEL THREE –

- a. The nature of the threat requires notification of more Team Members, but not guests.
- b. Inform the Team Members of the threat, form search teams and instruct them to conduct a thorough search of specific or general areas.
- c. Operations continue as normal.

4. LEVEL FOUR –

- a. The nature of the threat requires evacuation of specific or general areas.
- b. Instruct search teams to conduct a thorough search of areas involved.

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- c. Operations may be interrupted wholly or in part until the search has been cleared and an all clear reported.

Recent research and studies have shown that the safest approach as a result of a bomb threat is not an immediate arbitrary evacuation. This is due to the bombers limited access and the frequent placing of their devices close to outer entrances and exits. In evacuating personnel or guests, we may be moving them closer to the actual bomb.

EMERGENCY COMMAND CENTER

The Administration Training and/or Conference Room will be designated as the Emergency Command Center for bomb threats. All information to be conveyed to concerned department areas will be the responsibility of this office. Flashlights will be maintained in Security for use by all search teams.

BOMB SEARCH PROCEDURES

Upon receipt of a bomb threat, after notification has been made, Security will implement bomb search procedures and search teams will be dispatched.

NO RADIO COMMUNICATIONS ARE TO BE USED

Logically, Team Members that can be the most helpful in successfully locating suspected bombs are the persons that are acquainted with items that do or do not belong in their work area.

Each Team Member on the search team will have an assigned area to search keeping in mind that failure to perform a complete search could result in an actual explosion, injuries and/or death.

ZONED SEARCH AREAS

The property is zoned into search areas and search teams are identified as follows:

1. **AREA 1 - Main Casino** - Search Team Coordinator – Manager on Duty
 - a. Pit, restrooms, all change booths, EGM areas.
2. **AREA 2 - Front Desk** - Search Team Coordinator - Hotel Manager
 - a. Baggage room, valet parking, front entrance, hotel lobby, and front desk.
3. **AREA 3 - Hotel** Search Team Coordinator – Security Supervisor/Officers
 - a. Hotels

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- b. Hallways
 - c. Stairwells
 - d. Main Elevators
 - e. Osotouy Tower – Basement, First Floor, Second Floor, Third Floor, Fourth Floor, Fifth Floor, Sixth Floor, Seventh Floor, Eighth Floor, Ninth Floor, Tenth Floor, Eleventh Floor, Twelfth Floor
 - f. Kappa Tower – Basement, First Floor, Second Floor, Third Floor, Fourth Floor, Fifth Floor, Sixth Floor
4. **AREA 4 - Kitchen Areas** - Search Team Coordinator – On Duty Chef or Assistant
- a. Hallways, Pantry, Employee Dining Room (EDR), Bakery, all kitchens.
5. **AREA 5 - Facilities** - Search Team Coordinator - Facilities Supervisor
- a. Facilities workshops, roofs, boiler rooms.
6. **AREA 6 - Convention Center** - Search Team Coordinator – Banquet Supervisors
- a. Convention rooms, hallways, banquet kitchen, storage areas.
7. **AREA 7 - Restaurants and Lounges** - Search Team Coordinator - On Duty Beverage Manager
8. **AREA 8 - Administrative Offices** - Search Team Coordinator – Risk Manager/Security Supervisor
- a. Halls, restrooms, mail room, Surveillance, all offices.
9. **AREA 9 - Casino Cage** – Search Team Coordinator – On Duty Cage Manager
- a. Main Cage, Cages two and three, Main Bank, hard count, soft count
10. **AREA 10 - Outside Perimeter** - Search Team Coordinator



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- a. Parking Lot, RV Park, Parking lots, Valet parking, outside exits.

11. AREA 11 – Warehouse -Search Team Coordinator - Warehouse Supervisor

- a. Storage areas, purchasing, receiving dock.

12. AREA 12 - Administration Building - Marketing Director

- a. Halls, Restrooms, Marketing, Human Resources and Wardrobe offices and storage areas.

PRIORITY SEARCH AREAS INTERIOR

1. Entry or lobby areas
 - a. Planters
 - b. Display items
 - c. Seats
 - d. Ashtrays
 - e. News racks
2. Stairways and elevators
3. Restrooms
 - a. Towel racks
 - b. Trash containers
 - c. Toilet bowls
 - d. Supply closets
4. Trash or incinerator areas
5. Receiving areas

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6. Supply closets
7. Linen closets
8. Janitorial storage
9. Offices open to the public
10. Hotel guest rooms vacated and still unoccupied during last 24 hours
11. Hallways not normally used
12. Roofs
 - a. Cooling towers
 - b. Elevator equipment rooms
 - c. Roof vents and ducts

PRIORITY SEARCH AREAS EXTERIOR

1. Bushes, shrubs and planters
2. Planters and plant bed for freshly disturbed earth
3. Decorative facing and block work
4. Drain spouts
5. Trash receptacles
6. Mail boxes, night deposit boxes
7. Electrical panels
8. Manhole covers and storm drains
9. Parked vehicles next to building
10. Roofs and ledges if they are low enough that a package could be thrown onto it.

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If NO device is located: Security Manager or Supervisor will contact either the General Manager, Assistant General Manager or Director of Security to order the Hotel/Casino/Convention Center “all clear” and resume normal operations.

BOMB THREAT EVACUATION

1. If the caller directs the threat to a specific person or group in the hotel, the General Manager or Assistant General Manager will consult with the senior person in charge of that group. The police and DCR Management will make a decision whether or not to evacuate.
2. If for any reason there is a feeling that the call was legitimate, where the caller is specifying an area of the hotel, the area surrounding the specified area will be cleared as instructed by the bomb experts, with the approval of Management.
3. At the conclusion of the area search, the Search Team will report their findings to the Emergency Command Center. In the event that a suspected bomb is located, bomb squad experts will be dispatched to that area and the building will be evacuated on direction of the bomb experts with the approval of DCR Management.
4. **DO NOT USE THE WORD “BOMB” ON THE RADIO OR WHERE GUESTS MAY OVERHEAR.**
5. The area of evacuation is at least 300 feet.
6. **IF A SUSPECTED BOMB DEVICE IS LOCATED, IT SHOULD NOT BE TOUCHED, COVERED OR DISTURBED. THE IMMEDIATE AREA WILL BE ISOLATED. TEAM MEMBERS (Security Officers if available) WILL BE POSTED AT THE MOST DISTANT POINTS LEADING TO THE AREA. THEY WILL KEEP EVERYONE OUT. THE POLICE OR EMERGENCY SQUAD WILL TAKE OVER IMMEDIATELY UPON THEIR ARRIVAL.**

General Procedures

1. Team Members and guests will exit out the nearest emergency exit or the safest exit identified by the Command Center and meet at the Valet parking lot (Hotel and South Casino). All back of house and Administrative Building Team Members will evacuate to the West Team Member parking lot. All North Casino Team Members will move to the North parking lot. Meeting areas could be changed to keep individuals further away from suspected areas.
2. Each supervisor will supply the representative from Human Resources with a list of all personnel accounted for from their department.

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3. All Team Members must remain in their assembly area pending further instructions from their supervisor.
4. Interviews with any news media regarding the evacuation will be the sole responsibility of the General Manager, Assistant General Manager, Public Relations Manager or the Director of Marketing.

ADDITIONAL SPECIFIC DEPARTMENT PROCEDURES/RESPONSIBILITIES

SURVEILLANCE

Supervisor/Lead

1. Ensure that all Team Members are notified to evacuate their area. Contact Surveillance Manager and advise that an evacuation has been ordered.
2. Ensure that all cameras and recording equipment are up and recording. Take current VTR log book. Ensure that the door to the Surveillance room is locked.
3. Have Team Members leave by the closest exit or the safest exit identified by the Command Center and report to the Valet parking lot unless instructed to report to alternate meeting location.
4. Ensure that all on duty Team Members are accounted for.
5. Report to Surveillance Manager to inform that Team Members are accounted for. If the Surveillance Manager is not available, report to Manager on Duty.

Operators

1. Ensure that all cameras and recording equipment is up and working.
2. Lock and secure door to Surveillance room. Take radios, batteries and current VTR log.
3. Team Members should move to the Valet parking lot or other location as advised by the Command Center, then locate and report to their supervisor.

HOTEL EVACUATION

1. The order to evacuate the Hotel will come from the Manager on Duty, after conferring with the Security Supervisor, Hotel Manager/Supervisor and Facilities Supervisor. If time and the

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emergency permit, the Manager on Duty will coordinate the evacuation with either the General Manager, Assistant General Manager or Director/Manager of Security.

2. Teleservices (PBX) will be notified by the Security Dispatch to telephone guest rooms on the floor of the emergency as well as the floor above and below, or as directed by Quapaw Tribe Fire Department. The Teleservices (PBX) operator will activate a pre-recorded message for evacuation or will state: "There is an emergency, please depart your room by the nearest designated exit. Do not use the elevators. The nearest exit is shown on the diagram located on the back of your door."
3. The Security Dispatcher will dispatch available Security Officers, room service personnel, bell service personnel, and housekeeping personnel in order to direct and assist guests. Someone will be posted at each safe stairwell exit. An available Security Officer will pick up a current copy of the Handicap listing from the hotel front desk and these people will be evacuated first. Make sure that all guests have been awakened and are being evacuated. Security personnel assigned to the hotel will have a master key to open the doors to make sure rooms are all clear. Guestroom doors will be closed and marked with an "X" (Chalk is stored in fire extinguisher cabinets on each floor) after guests are evacuated. The Security Department will be responsible for the safekeeping of the evacuated guests' property to the greatest extent possible.
4. When it is mandatory to evacuate guestrooms and a room cannot be entered due to the "dead bolt" being in position or the guest cannot be awakened, Security Officers or engineers shall gain access by whatever means necessary.
5. When possible, Security Officers will be stationed at the top and bottom of the stairwells with radios. These Security Officers will act as a line of communication with guests and Team Members. They will also assist in the evacuation and in the prevention of thefts from unoccupied rooms, if possible.

Hotel Office Front Desk

1. Run 4 copies of the occupied room list (by room number). Give 1 copy to the Hotel Manager, 1 copy to Teleservices (PBX), 1 copy to the Manager On Duty and 1 copy to Security.
2. Run 3 copies of the occupied rooms list (alphabetical order). Give one copy to the Hotel Manager, one copy to the Manager on Duty and one copy to Security.
3. Ensure that all sensitive papers are secured. Lock and secure door if applicable.

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4. Team Members should move to the Valet parking lot unless otherwise directed by the Command Center, then locate and report to their supervisor.

FOOD AND BEVERAGE/CONVENTION CENTER

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area. Special attention should be made to ensure that hearing-impaired Team Members are notified.
2. Contact the appropriate Team Members to ensure all funds have been secured.
3. Have Team Members leave by the closest safe exit and report to the Valet parking lot unless otherwise directed by the Command Center.
4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to the Food and Beverage Director and/or next manager in line to advise them all Team Members are accounted for.

Kitchens

1. Turn off all stoves and/or electrical equipment.
2. If safe to do so, check all walk-in-boxes, freezers, and dish washing areas for personnel and secure before leaving. Account for hearing-impaired Team Members during this process.
3. Remove all carts from hallways and exits.
4. Team Members should exit out the nearest safe exit and move to the Valet parking lot unless otherwise instructed by the Command Center.
5. Team Members should then locate and report to their supervisor.
6. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

Restaurants/Food/Drink Outlets

1. Place all monies in register and lock drawers.

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2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area." Give directions to nearest exit.
3. Team Members should exit out the nearest safe exit and move to the Valet parking lot unless otherwise instructed by the Command Center.
4. Team Members should then locate and report to their supervisor.
5. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

MAIN BANK

1. Place all funds in drawer, close and lock drawers and retain the keys.
2. Notify Surveillance that personnel are leaving the Main Bank, if possible.
3. Pull down and secure roll down door.
4. Team Members should exit out the nearest safe exit and move to the north parking lot unless instructed otherwise by the Command Center.

COUNT ROOMS

1. Secure all funds and important records/documents in metal boxes and place in drop box cabinets.
2. Shut down all equipment.
3. Notify Surveillance at: (918)919-6280 that personnel are leaving the Count Room, if possible.
4. Team Members should exit out the nearest safe exit and move to the north parking lot unless instructed otherwise by the Command Center.
5. Team Members should then locate and report to their supervisor.
6. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

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ADMINISTRATION BUILDING EVACUATION

1. If time and the emergency permit, the Manager on Duty will coordinate the evacuation with the General Manager, Assistant General Manager or Director/Manager of Security. The order to evacuate the Tribal Gaming Agency portion of the Administration Building will come from the Tribal Gaming Agency.

FINANCE DEPARTMENT

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Ensure all funds and important documents have been secured.
3. Have Team Members leave by the closest exit and report to the west Team Member parking lot unless otherwise instructed by the Command Center.
4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Chief Financial Officer and/or next manager in line to advise him/her all Team Members are accounted for.

Purchasing

1. Ensure that all important papers are secured. Lock and secure door if applicable.
2. Team Members should move to the west Team Member parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.

Warehouse

1. Ensure that warehouse is secured so merchandise and stored items will not be accessible to others.
2. Ensure that all important papers are secured. Lock and secure door if applicable.
3. Team Members should go to the west Team Member parking lot (unless instructed otherwise by the Command Center) to locate and report to their supervisor.

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EGM DEPARTMENT

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Contact the appropriate Team Members to ensure all funds have been secured.
3. Have Team Members leave by the closest safe exit and report to the Valet parking lot unless instructed otherwise by the Command Center.
4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Gaming Operations Director and/or next manager in line to advise them all Team Members are accounted for.

EGM Attendants

1. Lock and secure change cart in cage, if possible, and retain the keys.
2. Inform patrons "At this time we are closed for business and are requesting all persons to leave this area." Also advise them that chips/tokens/tickets may be cashed in later and give directions to the nearest safe exit.
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

TABLE GAMES

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Ensure that all funds have been secured and the covers are locked on the tables.

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3. Have Team Members leave by the closest safe exit and report to the Valet parking lot unless otherwise instructed by the Command Center.
4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Table Games Manager (and/or next manager in line to them), that all Team Members are accounted for.

Dealers

1. Lock and secure cover on table and retain keys.
2. Inform patrons "At this time we are closed for business and are requesting all persons to leave this area." Also advise them that chips/tokens may be cashed in later and give directions to the nearest safe exit.
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

FACILITIES

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Team Members should leave by the closest safe exit and report to the Valet parking lot unless otherwise instructed by the Command Center.
3. Ensure that all on duty Team Members are accounted for.
4. Ensure that all sensitive keys are collected from Team Members.
5. Report to the Director of Facilities (or next manager in line) to advise them that all Team Members are accounted for.

Facility Team Members

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1. If possible, ensure all gas and electricity is turned off if applicable.
2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area." Give directions to the nearest exit.
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.

HOUSEKEEPING

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Have Team Members leave by the closest safe exit and report to the Valet parking lot unless otherwise instructed by the Command Center.
3. Ensure that all on duty Team Members are accounted for.
4. Ensure that all sensitive keys are collected from Team Members.
5. Report to the Director of Hotel Operations or next manager in line to advise them that all Team Members are accounted for.

Public Area Attendants

1. Push all carts and other equipment into storage areas and out of hallways/pathways to assist in a safe and prompt evacuation.
2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area." Give directions to the nearest safe exit.
3. After the property has been either totally or partially evacuated, hotel Team Members, under the direction and guidance of the Director/Manager of Security or designee, will ensure the following:
 - a. A sweep of all guestrooms will be made to ensure that all guests have been evacuated from the property. Special emphasis will be given to occupied handicapped rooms.
 - b. All Team Member areas will be double-checked to make certain they are completely evacuated.

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- c. All maintenance department areas, hallways, stairwells, linen rooms, housekeeping section and roof areas will be double-checked to make certain they are completely evacuated.
- d. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center then locate and report to their supervisor.

VALET DEPARTMENT

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.
2. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.
3. Ensure that all sensitive keys are collected from Team Members.
4. Report to Director of Hotel Services or next manager in line to advise them that all Team Members are accounted for.

Valet Team Members

1. Lock and secure all funds in register, close and lock drawer containing guests' car keys and retain the keys.
2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area."
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor.

PLAYERS CLUB/Q-CLUB

Manager/Supervisor

1. Ensure that all Team Members are notified to evacuate their area.

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2. Contact the appropriate Team Members to ensure all important documents have been secured.
3. Have Team Members leave by the closest safe exit and report to the Valet parking lot unless otherwise instructed by the Command Center.
4. Ensure that all on duty Team Members are accounted for.
5. Ensure that all sensitive keys are collected from Team Members.
6. Report to Marketing Manager or next supervisor in line to advise them that all Team Members are accounted for.

Players Club/Q-Club Team Members

1. Place all sensitive documents in drawer, and close and lock drawers and retain the keys.
2. Inform patrons "At this time we are closed for business and requesting all persons to leave this area." Give directions to the nearest safe exit.
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.
4. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

SECURITY

Command Center For Evacuations

1. If evacuation of guests becomes necessary, Security will establish a command center in the Administration Training and/or Conference Room. The Director of Security, General Manager, Assistant General Manager, Manager of Facilities, Director of Hotel Services, Director of Food & Beverage, and other key executives will assemble in this area. The Quapaw Tribe Fire Department Command Center may also be established in the Administration Training and/or Conference Room. The Security Office will be equipped with multiple phones, radios, and be supported by emergency power. Radio communications will also be established from the Emergency Command Center with departmental support staff as required. Should it be impossible to man this area due to danger, another location will be selected.

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2. The Assistant General Manager, General Manager or Designee will direct the following activities:
 - a. Activate the Emergency Command post and notify Surveillance.
 - b. Monitor and evaluate the situation and/order PBX announcements depending on the state of emergency.
 - c. Organize assistance teams within specific departments to provide direction and assistance to guests and Team Members.
 - d. Make public announcements as deemed necessary.
 - e. Provide appropriate information to the media.
 - f. Prepare plans to return to normal operations as soon as possible.
3. Security Dispatch ext 6083 will log all incident information.
4. All Security telephone extensions will be given top priority by Teleservices (PBX) operators.
5. In the event of communications failure, Security personnel will act as runners with messages to and from the Emergency Command Center.
6. If necessary, all off-duty Security Personnel may immediately be called and ordered to report to work in uniform.
7. If a command center is opened, IT's function will be to install phones immediately.

Director of Security

1. It will be the responsibility of the Director of Security, if available, to evaluate the situation and determine the extent of security staffing required throughout the property to protect life and property.
2. If armored car support is required to provide adequate security coverage for currency, records, etc. it will be the Director/Manager of Security responsibility to request such support from Loomis.

Security Manager

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1. The Director of Security will take whatever action is appropriate to provide adequate staffing. If the Director of Security is not available, the Security Manager will fulfill these duties.
2. Ensure that all Team Members are notified to evacuate their area. Contact the Director of Security and advise that an evacuation has been ordered.
3. Have Team Members leave by the closest safe exit and report to the Valet parking lot or designate the appropriate meeting area.
4. Ensure that all on duty Team Members are accounted for.
5. Report to the Director of Security to advise them of members accounted for. If the Director of Security is not available, report to Manager on Duty.
6. In the event a Security Manager is not on duty, the Security Supervisor will fulfill these duties.

Officers

1. Security Officers assigned to the casino floor will be responsible for checking areas such as dressing rooms, dining rooms, break rooms, guest rooms, and/or any kitchen, insuring that all guests and personnel have been evacuated and marking those areas with chalk by placing an "X" on the door.
2. Officers will make every effort to keep fire doors between stairways and floors closed to prevent drafts. They will also be responsible for prohibiting unauthorized persons from entering restricted areas.
3. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center then locate and report to their supervisor.

Teleservices (PBX)

1. When instructed to do so, activate the emergency evacuation announcement or make the announcement manually.
2. If the evacuation includes the hotel, use the occupancy list printed by the front desk to call all guest rooms allowing 4 rings. Begin with the affected floor, then the floor above, the floor below, and start from the top floor ascending down.

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3. Any room in which a guest does not answer the phone, highlight and call a second time after all rooms are called.
4. Stay and direct calls as long as the situation is safe.
5. Team Members should move to the Valet parking lot unless otherwise instructed by the Command Center, then locate and report to their supervisor.

PEOPLE WITH DISABILITIES

1. All occupied handicap rooms will be given top priority for evacuation due to the guest's special evacuation needs.
2. Always ask someone with a disability how you can help before attempting any rescue technique or giving assistance.
3. Ask whether there are special considerations or items that need to come with them.

Blindness or Visual Impairment

1. Speak to the person in a calm, clear voice in order to keep the person calm.
2. Team Members should offer to lead the person to a place of safety.
3. Give verbal instructions including directions, estimated distances and any obstructions they may encounter.
4. Do not grasp a visually impaired person's arm. Ask them to hold onto your arm as you walk, especially if there is debris or a crowd.

Deafness or Hearing Loss

1. Get the attention of a person with a hearing disability by touch or eye contact. Clearly communicate the problem to them. Gestures and pointing may be helpful but be prepared to write a brief statement if the person does not seem to understand.
2. Team Members should offer to lead the person to a place of safety. If the person refuses, offer visual instructions to advise of the safest route or direction by pointing toward exits or a safe area.

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Mobility Impairment

If people with mobility impairments are unable to exit, they should be moved to a safer area such as most stairwells or an office with the door closed which is a good distance from the hazard.

Notify Security or Fire personnel immediately about any persons remaining in the building in areas that have been evacuated. They will decide whether people are safe where they are and will evacuate them as necessary.



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BOMB THREAT CHECKLIST

DATE: _____, 20____ TIME: _____

ORIGIN OF CALL: () LOCAL () LONG DISTANCE () INTERNAL

EXACT WORDING OF THE THREAT:

QUESTIONS TO ASK:

1. When is the bomb going to explode? _____
2. Where is it right now? _____
3. What does it look like? _____
4. What kind of bomb is it? _____
5. What will cause it to explode? _____
6. Did you place the bomb? _____
7. Why? _____
8. What is your name? _____
9. Where are you calling from? _____
10. What is your address? _____

TYPE OF SPEECH: (Check all that apply)

- | | | | |
|--------------|---------------|---------------------|--------------------|
| () Calm | () Angry | () Excited | () Slow |
| () Rapid | () Soft | () Loud | () Laughter |
| () Crying | () Normal | () Distant | () Slurred |
| () Nasal | () Stutter | () Lisp | () Raspy |
| () Deep | () Ragged | () Accent | () Disguised |
| () Familiar | () Whispered | () Crackling Voice | () Deep Breathing |

BACKGROUND SOUNDS: (Check all that apply)

- | | | |
|-------------------|-----------------|---------------|
| () Street Noises | () Machinery | () Crockery |
| () Animal Noises | () Voices | () PA System |
| () House Noises | () Music | () Motor |
| () Clear | () Static | () Local |
| () Long Distance | () Pay Station | () Children |

THREAT LANGUAGE: (Check all that apply)

- | | | |
|-------------------|----------------|----------|
| () Well educated | () Incoherent | () Foul |
| () Irrational | () Taped | () Read |

OTHER:

Sex of Caller: _____ Race: _____ Age: _____



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Remarks: _____

NAME OF PERSON RECEIVING CALL _____

DEPARTMENT _____

BOMB THREAT (continued)

Be calm. Be courteous. Listen carefully. Do not interrupt the caller.

Do not hang up the phone. Keep the line open. Try to keep the caller on the telephone as long as possible and alert someone else so they can get on another extension and notify the police and telephone company to trace the call.

A written threat should be turned over to police.

Immediately after the call:

Notify the Security Department (**6083**).

Notify a supervisor or manager as soon as possible.

NOTE: During periods of inclement weather, when evacuations are expected to last for some time, a decision will be made by the Incident Commander to move Team Members to an alternate location.

Do not use cell phones, radios or walkie-talkies in areas of known device.

All activities are to be documented by a supervisor or manager for the police or fire department.

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CHAPTER 5 - ANTHRAX AND BIOLOGICAL AGENTS

Anthrax and Biological Agent Exposure Control

The risk of contracting a disease from an envelope is extremely low. General awareness of your surroundings and the application of a few simple and effective precautions are appropriate:

1. Wash your hands with warm water and soap before and after handling the mail.
2. Do not eat or drink around the mail.
3. If you have open cuts or skin lesions on your hands, wearing disposable gloves or other non-latex gloves may be appropriate. If you are worried about contracting a disease from the mail, the gloves are an effective barrier for preventing infection and will help provide peace of mind.
4. Surgical masks, dust masks, eye protection or gowns are NOT necessary or recommended.
5. If a letter is received that contains powder or a written threat, the following instructions apply:
 - a. Do not shake or empty the envelope.
 - b. If you have a zip-lock or similar type plastic bag, put the mail inside and seal it. If not, isolate the specific area of the workplace so that no one disturbs the item.
 - c. Evacuating the workplace is NOT necessary at this point, but clear the area.
 - d. Call 911 and tell them what you have received and what you have done with it. Indicate whether the envelope contains any visible powder or if the powder was released.
 - e. Wash your hands with warm water and soap, for one full minute.
 - f. Notify the Risk Manager to report the incident.
 - g. Do not allow anyone who may have touched the envelope to leave the office.
 - h. When emergency responders arrive, they will provide further instruction on what to do.



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6. Until the emergency responders arrive, don't panic, don't walk around with the letter or shake it, and don't merely discard the letter.

How to Identify Suspicious Packages and Letters:

1. Look for the following indicators:
 - a. Packages or letters that are unexpected
 - b. Excessive postage on the package or letter
 - c. Handwritten or poorly typed addressing
 - d. Incorrect titles or names
 - e. Title but NO name
 - f. Misspelling of common words
 - g. Oily stains, discoloration or odor
 - h. No return address
 - i. Excessive weight or heavy for its size
 - j. Lopsided or uneven envelope
 - k. Protruding wires or aluminum foil
 - l. Excessive security material such as duct tape, masking tape, string, etc
 - m. Visual distractions such as child-like drawings
 - n. Ticking or strange noises emitting from the letter or package
 - o. Marked with restrictive endorsements such as "PERSONAL" or "CONFIDENTIAL"
 - p. Return address does not match the postmark, i.e., return address in your city but, mailed from another city.

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Procedures for Handling Suspicious Mail

1. When a suspicious piece of mail is discovered, you must take the following actions:
 - a. Once the mail piece, package or letter, has been identified as a suspicious or contaminated mail piece, do not handle the letter or package.
 - b. Call Security Dispatch at **6083**.
 - c. Notify your supervisor or manager immediately.
2. The supervisor or manager of the area or function will ensure that the area around the suspicious package or letter is isolated and then cordoned off to prevent access. It is not necessary at this point to evacuate the entire building.
3. Anyone who has touched or come into contact with the mail piece will be instructed to wash their hands with warm water and soap for at least one or two minutes. The supervisor or manager will keep a list of those that have touched or come into contact with the mail piece.
 - a. Wait for emergency personnel to arrive and follow instructions once they are on-site. Do not handle or attempt to clean up the area and do not allow anyone who has come into contact with the mail piece to leave the facility.
4. Emergency response personnel will provide instruction from this point.
5. The supervisor of the office or function will provide a written report of investigation of the event to the Risk Manager as soon as possible after the event has been terminated by officials of the police and fire department.

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CHAPTER 6 - CIVIL DISTURBANCE

Civil Disturbance Procedures

Civil disturbances include riots, demonstrations, or assemblies that have become significantly disruptive. The following procedures apply in the occurrence of a civil disturbance:

1. Avoid provoking or obstructing demonstrators.
2. Team Members will avoid the immediate area of the disturbance.
3. Team Members will continue to conduct normal business as much as possible.
4. If the disturbance is outside the building, stay away from doors and windows and remain inside the building.
5. The Security Manager or Security Supervisor will make the determination when to call Quapaw Marshalls. The Security Supervisor will coordinate and cooperate with police upon their arrival.
6. If necessary, entrance to the hotel and/or casino may be restricted. It is permissible to restrict entrance to only allow registered guests, guests who wish to register or who have a confirmed reservation, Team Members and those persons conducting official business on the property.
7. If an entrance that is normally open has been secured, a Security Officer or other assigned Team Member will be posted at that entrance with keys to permit emergency entrance/exit by guests and Team Members.

Securing the Property

1. It is important to make an effort to keep demonstrators out of the property buildings.
2. Security Officers will be assigned to each major entrance/exit. Guests desiring to leave the building may do so but should be advised of the possible danger.
3. Only law enforcement, fire or emergency medical personnel will be allowed inside the building.

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Post-Incident Procedures

The following are procedures to be followed after a civil disturbance has occurred and the danger has passed:

1. The primary responsibility of Team Members once the danger has passed and any injured have been cared for will be to resume normal business operations as soon as possible.
2. The Director/Manager of Security, Risk Manager and other key personnel will attend any external debriefings held by the Quapaw Marshalls or other involved agencies.

Director of Facilities

The Director of Facilities will be responsible for damage assessment. A preliminary damage report will be prepared and submitted to the General Manager or Assistant General Manager as soon as possible. A complete damage report will be submitted to the General Manager or Assistant General Manager within 7 days of the incident.

Director of Security

An internal post-incident debriefing will be held within 7 days of the incident to analyze the emergency response and determine what did and did not work well. Recommended changes to procedures will be provided to the Director of Security. The Director of Security will prepare a post-incident emergency response report and submit it to the General Manager or Assistant General Manager within 7 days of the debriefing.

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CHAPTER 7 - EARTHQUAKE

1. Earthquakes occur most frequently west of the Rocky Mountains, although historically the most violent earthquakes have occurred in the central United States. Earthquakes occur suddenly and without warning.
2. In an earthquake, if **indoors**, stay there. Take cover under a sturdy piece of furniture or counter, or brace yourself against an inside wall. Protect your head and neck.
3. If **outdoors**, move into the open, away from buildings, street lights and utility wires.
4. After an earthquake, stay away from windows, skylights and items that could fall. Do not use the elevators. Use the stairways to leave the building if it is determined that a building evacuation is necessary.

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CHAPTER 8 - SEVERE WEATHER

Threats of severe weather can come in three different categories: Watches, Severe Thunderstorms and/or Warnings.

1. Watch – A “watch” means that conditions are favorable for a severe weather event in or near the watch area. Watches are issued for tornadoes, severe thunderstorms and flash floods.
2. Severe thunderstorm – A severe thunderstorm is a storm that is capable of producing hail $\frac{3}{4}$ inch in diameter or larger and/or wind gusts of 58 miles per hour or more.
3. Warning – The severe weather event is imminent or occurring in the warned area. Warnings are issued for tornadoes, severe thunderstorms, flash floods and river flooding.

WATCHES (Tornado, Flood or Severe Thunderstorm)

1. Tornadoes are more prevalent during the months of March through August. During these months, Security Dispatch will continually monitor current and forecasted weather conditions.
2. If a tornado watch and/or severe thunderstorm watch is issued, Security Dispatch will alert the following:
 - a. Security Supervisor
 - b. Manager on Duty
 - c. QTGA Compliance Agent
2. The Security Supervisor will deploy trained storm spotters to the parking lot and/or roof for observation. Spotters must take shelter inside the building if either a tornado or severe thunderstorm warning is given.
3. The Security Supervisor will notify Security Officers to remain on Security Channel 1 unless directed to go to another channel and to hold radio traffic to a minimum.



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TORNADO WARNING

1. If in-house shelter is ordered, Security Dispatch is to read on the intercom the following:
 - a. "This is an emergency alert. Listen for instructions." Followed by:
 - b. "Please follow the instructions of casino personnel. Customers please proceed carefully to the nearest restrooms. Hotel customers please move carefully to the hotel basement. Restaurant customers will stay where they are except customers of the Spring River Buffet will move to the Red Oak Steakhouse. All Team Members will move to their designated rallying points".

Security Procedures

1. If a tornado warning is issued for this area, Security Dispatch will immediately notify the following individuals to approve emergency in-place sheltering:

Assistant General Manager	Jani Cumming	cell (918)919-9795	office (918)919-6230
Assistant General Manager	Ernie Dellaverson	cell (860)460-1089	office (918)919-6232
Director or Manager of Security	Bill Goodwin	cell (918)919-9097	dispatch (918)-919-6083

2. In the absence of an Executive Team Member, the order for emergency in-place sheltering will be given by the Security Manager or if not present the Manager on Duty after conferring with the Security and Facilities Supervisors.
3. Security Dispatch will radio spotters to take shelter inside the building. Dispatch will also send available officers, room service personnel, bell service personnel, and EVS personnel to direct and assist guests. Someone will be posted at each stairwell with radios and will act as a line of communication between guests and Team Members. They will also assist in the prevention of thefts from unoccupied rooms, if possible. Security will solicit assistance from other Team Members as needed.
4. It is unlawful for us to prevent anyone from leaving the building although leaving can be very dangerous. We do have a responsibility to let everyone know about the weather conditions before they leave. The doors will not be locked allowing guests to come in for shelter or leave.
5. When in-place sheltering is ordered, Security Officers will deploy according to their assigned posts as follows:
 - a. Each Officer will go to designated post zone and standby for further instructions.

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- b. Patrol Officer will make visual of parking and go inside to assist with emergency.
- c. Security Supervisor/Manager will issue the door pass key for hotel to Officers assigned to the hotel.
 - i. Emergency Command Post
 - ii. Casino Floor
 - iii. Hotel Entrance – Maintain post
 - iv. Assist guests in the hotels
 - v. Assist with players
- 6. Officers will not ask if it is “All Clear” over the radio or at any time during any emergency. This causes confusion and misunderstanding. Officers should assume that the situation is current until otherwise notified.
- 7. Security Supervisor/Manager will advise of all clear through the PA system and Security radios, when the National Weather Service gives the all clear.

Public Area Attendant Procedures

Push all carts and other equipment into storage areas out of hallways/pathways.

TORNADO SHELTERS

1. When in-house shelter has been issued, all Team Members should make every effort and encourage guests to get inside the nearest building and proceed to the closest tornado shelter. Elevators should not be used. If there is not enough time to get inside the building, Team Members should lie down in a ditch or low lying area until the storm has passed.
2. Team Members must move quickly but remain calm and attempt to calm guests while proceeding to the tornado shelters. Smoking is not allowed in the tornado shelters due to possibility of gas leaks.
3. The following is a list of tornado shelters on the property. Keep in mind that you may not be in your work area when the emergency takes place. If not, don't try to go back to your area, go to the nearest shelter.



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Hotel

1. Osotouy Hotel and Convention Center – The basement or interior hallways on the lowest floor away from windows and stair wells on each hotel floor (all the way up) are to be used as shelters.
2. Kappa Tower, Nee Spa, and Ma-Ko-Sha shop – The basement or interior hallways on all floors away from windows. If possible, follow stairwells to lower floors and fill hallways on lower levels.
3. Hotel Front Desk Team Members:
 - a. Run a list of occupied rooms by number and one by alphabetical order.
 - b. Ensure that all sensitive papers are secured.
 - c. Take shelter in the back of the house hallway nearest to your current location.

Administration Building

1. Administration Central – Will go to the back of the house hallway.
2. Count Room – Team Members should go to the hallway outside the Main Bank area.
3. Cashier Cages –
 - a. Place all funds in drawer, close/lock and retain keys and go to the hallway outside the Main Bank area.
 - b. Move all rolling carts out of hallway.
4. Main Bank –
 - a. Place funds in drawer. Close and lock drawers and retain keys.
 - b. Pull down and secure roll-down door.
 - c. Go to the hallway outside the Main Bank area.
5. Count Rooms –

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- a. Secure all funds and important records/documents in metal boxes and place in drop box cabinets.
 - b. Shut down all equipment.
 - c. Go to the hallway outside the Main Bank area.
6. Surveillance –
- a. Ensure that all cameras and recording equipment are up and recording.
 - b. Make sure that the roof cameras are pointed toward the storm.
 - c. Take current VTR log book, radios and batteries.
 - d. Ensure that the door to the Surveillance room is locked and go to the back of the house hallway.
7. Teleservices (PBX) – Use the occupancy list printed by the front desk to call all guest rooms allowing 4 rings. If the guest doesn't answer the phone, highlight and call a second time after all rooms are called. Shelter in-place and direct calls.
8. Warehouse – Ensure that the warehouse is secured so merchandise and stored items will not be accessible to others. Secure important papers.

Casino

1. All casino patrons and Team Members may be directed to any restaurant, outlet or restroom surrounding the casino floor, or be moved to the Osotouy hotel stairwells as time and occupancy levels allow for in-house sheltering.
2. Table Games – Ensure that all funds have been secured and the covers are locked on the tables.
3. Valet Team Members –
 - a. Lock and secure funds in register.
 - b. Close and lock drawer containing guests' car keys and retain the keys.
 - c. Go to the back of the house hallway.

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4. Player's Club/Q-Club –
 - a. Place sensitive documents in drawer.
 - b. Close and lock drawer and retain keys.
 - c. Go to the back of the house hallway.
5. EGM Department – Ensure that all funds have been secured.

Other DCR Facilities Outside Casino

1. Learning Center – All Learning Center Team Members will secure all children present in the safe room. They will shut all doors to their class rooms in the process of moving to shelter. All Team Members and children will be accounted for and checked off using the class rosters.
2. Q-Store Convenient Center – Lock and secure all funds in the registers. Move all guests and Team Members into the safe areas (Restrooms and Offices). If time allows alert guests who are in the Q-Store Parking of the impending danger.

Restaurants

Restaurant Team Members –

1. Turn off all stoves and/or electrical equipment.
2. Go to your rally points and provide sensitive keys to your supervisor or manager.

Handicapped Guests

An available officer will pick up a current copy of the Handicap listing from the hotel front desk and these people will be taken to the shelter first. Security will assign two individuals to assist with the physically challenged occupants of the building. Ask them whether there are special considerations or items that need to come with them.

Blindness or Visual Impairment

1. Speak to the person in a calm, clear voice in order to keep the person calm.
2. Offer to lead the person to a place of safety. Give verbal instructions including directions, estimated distances and any obstructions they may encounter.



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3. Do not grasp a visually impaired person's arm. Ask them to hold onto your arm as you walk, especially if there is debris or a crowd.

Deafness or Hearing Loss

1. Get the attention of the person by touch or eye contact.
2. Clearly communicate the problem.
3. Gestures and pointing may be helpful but be prepared to write a brief statement if the person does not seem to understand.

PBX will call rooms that are occupied and instruct guests to take shelter. Security personnel assigned to the hotel will have a master key to open the doors to make sure rooms are all clear. Guestroom doors will be closed and marked with an "X" after guests are evacuated. Chalk is stored in fire extinguisher cabinets on each floor. Security will be responsible for the safekeeping of the sheltered guests' property to the greatest extent possible. When in-place sheltering is mandatory and a guest room cannot be entered due to the "dead-bolt" being in position or the guest cannot be awakened, Security Officers or engineers shall gain access by whatever means necessary.

TORNADO STRIKES

If a tornado strike does occur, power failure is extremely possible.

Everyone should remain in the tornado shelter (as long as it is safe) until a Security Officer gives you additional instructions. When moving from your shelter, watch for fire, damage, or other threats to safety. Do not use routes that have extensive damage or blockage. Avoid touching electrical wires that may be on the ground.

POST-INCIDENT PROCEDURES

Security Procedures

1. Security Officers will be sent to each tornado shelter to determine if there are injuries, damage, deaths or individuals missing. This information will be given to the:

Security Manager or Supervisor	(918) 919-1218	Dispatch #6083
Manager on Duty	(918) 919-2542	Office #6202
General Manager/Assistant General Manager	Office #6230/6232	
QTGA Compliance Supervisor	(918) 919-6032	
Risk Manager	Linda Shipman (918) 919-9976	Office #6263

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2. The Security Manager or Supervisor will designate areas for triage of ambulatory patients. This must be in a safe area and should not be determined until structural damage is assessed. Emergency Medical Technicians will be responsible for conducting triage until ambulance personnel arrive. Emergency first aid equipment will be moved to the triage area and trained personnel from all departments will be utilized along with Team Member and guest volunteers. The Security Manager or Supervisor will assign someone to obtain blankets, pillows and sheets from EVS for the triage area.
3. After Facilities determines that the area is safe, the Security Manager or Supervisor will organize search teams to look for injured guests and Team Members that were identified as missing provided the search area is safe. All Security Officers will be assigned to search teams with the exception of the dispatcher. Personnel from other areas may be requested to assist in this effort. The Security Supervisor may request Security Dispatch to call in off-duty officers.
4. A roving Security Patrol will be in place for the purpose of preventing unauthorized persons from entering the property if available.
5. An internal post-incident debriefing will be held within 7 days of the incident to analyze the emergency response and determine what did and did not work well. Recommended structural changes and changes to procedures will be provided to the Director of Security. The Director of Security will prepare a post-incident emergency response report and submit it to the General Manager or Assistant General Manager within 7 days of the debriefing. The Director of Security, Risk Manager and other key personnel will attend any external debriefings held by the Quapaw Tribe Fire Department or other involved agencies.

QTGA Compliance Agent Procedures

The highest ranking QTGA Compliance Agent on duty at the time during crimes may request outside assistance through Security Dispatch if they deem it necessary. Outside assistance may include ambulance, fire or police departments, state agencies or other necessary resources for aid. The QTGA Compliance Agent shall notify the QTGA Director, Deputy Director or designee as soon as possible.

EGM Team Member Procedures

The casino entrance doors will be manned by EGM Team Members with radios.

Facilities Procedures

1. Facilities will be responsible to ensure that air transport landing areas are clean and prepared for landings.

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2. Facilities must make sure that all gas, water and electricity are turned off if applicable.
3. Protect the property. Close building openings, restore sprinkler systems and power, and protect computers, records, and equipment against moisture and corrosion.
4. The Manager of Facilities will be responsible for damage assessment. A preliminary damage report will be prepared and submitted to the General Manager or Assistant General Manager as soon as possible. A complete damage report will be submitted to the General Manager or Assistant General Manager within 14 days of the incident.

Risk Manager Procedures

1. Call the property insurance company.
2. Pictures and videos of all damage will be taken before it is cleaned.

Human Resources Procedures

Once the danger has passed and the injured have been cared for, the primary responsibility of Team Members will be to resume normal business operations as soon as possible. Human Resources will be responsible for keeping Team Members informed of the situation, i.e. whether or not to report to work, what to do etc.

MEDIA ISSUES

Interviews with any news media regarding the emergency situation will be the sole responsibility of the General Manager, Assistant General Manager, Public Relations Manager or the Director of Marketing.

TRAINING

1. All DCR Team Members will receive Severe Weather training at the time of initial assignment and annually thereafter.
2. Security will be responsible for the training.
3. Training documentation will be retained by the Security Department and Human Resources.

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QUICK LIST TO BE USED FOR STORM WATCHES/WARNINGS

In the event of storm watches, Security Dispatch will notify the department head/designee, and advise of the storm watch so they may be prepared in case of a warning.

<u>WHO</u>	<u>EXTENSION</u>	<u>CELL/ALTERNATE#</u>
Executive:		
Jani Cummings, Assistant General Manager	6230	(918)919-9795
Ernie Dellaverson, AGM	6232	(860)460-1089
Security:		
Bill Goodwin, Director	6078, 6080, 6083	(918)919-9097
Finance:		
Kent Jones, CFO	6050	(918)541-8939
I.T:		
Dave Clark, Director	6295	(918)541-8746
Marketing:		
Shawn Carlson, Director	6216	(918)919-9068
Hotel:		
Bob Bergquist, Director	6150	(918)919-9794
Poker:		
Eric Hunter, Manager	6229	(918)919-9324
Purchasing:		
Jerri Montgomery, Director	6244	(918)919-9695
Tim Montgomery, Whse MGR	6245	(918)919-9809
Wardrobe (West Warehouse)		
Rexenna Vanderford, Supervisor	6157 6159	(918)919-1634
EVS/Housekeeping:		
Linda Starkebaum	6151	(918)919-9814



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Facilities/Construction:

Ernie Caruthers, Director	6905	(918)541-8731
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Valet/Guest Services:

Troy Harvey, MGR	6152	(918)919-9915
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Gaming Operations:

Bob Moritz, Director	6090	(918)541-4497
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Surveillance:

Bill Cornell, Director	6280	(918)541-8734
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Table Games:

Sean Matthews, MGR	6052	(918)919-9457
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PBX

Quapaw Tribal Gaming Agency	6001, 6012, 6000 6030	(918)533-5554
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CHAPTER 9 - POWER OUTAGES

POWER FAILURE

1. The backup generator should automatically restore temporary power to limited areas of the Casino, Hotels and Convention Center.
2. At first sign of power failure, all personnel must be particularly alert for the prevention of injury and crime. Personnel operating equipment using more than 110 volts should shut down equipment until power returns to normal. Heavy motors may burn out due to power fluctuation.

Facilities Responsibilities

1. Determine the cause of the power failure. If the failure is due to an outside source, contact the Power Company and get an estimated time for power to be restored.
2. Contact Security Dispatch and inform them the reason and when power will be restored.
3. Ensure all generators are functioning and have sufficient amount of fuel.
4. Check to ensure all elevators have come to the ground level.
5. Check to ensure that all emergency lighting is functioning.

Security Dispatch Responsibilities

1. Notify Teleservices (PBX), Security Supervisor, Manager on Duty and QTGA Compliance Agent.
2. Dispatch officers to locations where money is handled to observe and protect the assets.

Elevators

1. When normal power is lost, Hotel elevators will stop where they are and need to be checked for occupancy.
2. Facilities are responsible to manually direct Hotel elevators to the closest floor.

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CHAPTER 10 - UTILITY LEAKS AND EMERGENCY SHUT-OFFS

WATER LEAKS

Person Identifying Situation

1. Immediately notify Teleservices and advise of the situation.
2. Remain on scene until Security and/or Facilities arrives.

Teleservices Operator

1. Notify Facilities of the leak and dispatch them to the area.
2. Notify Security Dispatch at extension 6083 of the leak.

Security Dispatch

1. Notify the Security Supervisor of the nature and location of the problem.
2. Notify Surveillance.
3. Contact Facilities.

Facilities

1. Respond to the area and determine what corrective actions are necessary.
2. If water is leaking onto and over EGM machines, contact an EGM Supervisor to respond.
3. Facilities will determine if it is necessary to turn off power to the machines. If practical, before the power is turned off, credits should be noted along with the identification of persons playing the machines. This will be the responsibility of the EGM Department.
4. Plastic sheeting from the boiler room or wood shop will be placed over affected EGM machines.
5. Environmental Services personnel will be contacted to respond with cleanup equipment.
6. The area will be cordoned off by using caution tape or stanchions to prevent guests and other Team Members from walking through it.

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WATER LEAKS ON THE GAMING TABLES

1. If water is leaking onto gaming tables in a pit, a Table Games Manager will decide if tables need to be closed in the affected area.
2. The affected area should be cordoned off by using caution tape or stanchions to maintain the integrity of the pit.
3. Affected tables may be moved or covered with plastic from the boiler room or wood shop.
4. Buckets should be placed under leaks to minimize damage.
5. The carpet should be wet-vacuumed by EVS as soon as possible to minimize damage.

WATER LEAKS IN THE HOTEL

1. If the leak is in the hotel and there is extensive water leakage, Facilities will check rooms on the lower floors for additional water damage.
2. The Hotel Supervisor will coordinate with guests for any room changes, if needed.

WATER LEAKS IN THE RESTAURANTS

1. If the leak is in the buffet or steakhouse, the Food and Beverage Manager or Manager on Duty will determine if partial or all areas need to be closed.
2. Facilities will move tables and chairs, or place plastic sheeting over the area to minimize water damage.

MAIN WATER SUPPLY LOSS

1. Security Dispatch will notify the Water District.
2. Alternative water supplies may be procured by purchasing, such as Lindy Spring Water.
3. Notify the Quapaw Tribe Environmental Department of all water supply disruptions. Sampling and analysis of drinking water may be required before water is again allowed to be consumed by the public.

EMERGENCY WATER SHUTOFF

The Emergency Water Shutoff is outside the Hotel on the Southwest side. A tool is needed to

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cut it off. Facilities will have access to this tool and will be responsible for shutting it off.

LOCATION OF FIRE EQUIPMENT

1. Fire Sprinkler System - throughout the Facility
2. Fire Alarm Reset - Security Dispatch, Mechanical Room in Admin Building, and Facilities.
3. Fire Alarm Pull Stations - Throughout the Facility.
4. Smoke Detectors - Throughout the Facility.
 - a. There are no heat detectors in Downstream Casino Resort, only smoke detectors. The smoke detectors will set off the audible alarm and strobes just like a pull station. A flashing green light on a smoke detector indicates that the detector is in normal operation mode. A steady red light indicates that the detector is in trouble mode. Only authorized personnel (Security personnel, Fire Department, Incident Commander) will be allowed to silence an alarm.
5. Security Alarm Panel - Security Dispatch, Mechanical Room in Admin Building
6. Emergency Lighting - Throughout the Facility.

THE OXYGEN ELIMINATION SYSTEM:

All technologically sensitive areas (I.T., IDF, and Surveillance rooms) have a Fire Oxygen Elimination/Fire Suppression System. If the system goes off, it will trigger the alarms like other triggers. Facilities and the Security Supervisors will be notified to respond. Surveillance will be notified so they can check the area.

EMERGENCY ELECTRICAL SHUT OFF

1. The DCR Facilities Department will have staff on duty 24 hours/7 days a week.
2. The Electrical cutoff is in three (3) locations in the Facility.
 - a. Hotel Basement Rm 0116
 - i. Normal Cutoff SHNPB-1-1 AND SHNPB-1-2
 - ii. Emergency Cutoff SHEPB-1-1

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- b. Electrical Room 1337 (just north of walk-in freezer) north of break room
 - i. Normal Shutoff SHNP1-3-1
- c. Electrical Room 1338 (just north of walk-in freezer) north of break room hallway door
 - i. Emergency Cutoff SHEP1-3-1
- 3. Incident Commander or Facility Manager will respond as follows:
 - a. Gather facts and verify information.
 - b. Call Maintenance Department.
 - c. Log activities and decisions.
 - d. Move Team Members from affected area, if necessary.
 - e. Close up and/or secure affected area.
 - f. Post warning signs.
 - g. If a major line is down or sparks are visible, call **911**. Give location and remain on line until information is complete.
 - h. Keep everyone away from line. Never touch live wires or any wires that are on the ground.
 - i. **DO NOT ATTEMPT TO RESCUE A PERSON who is experiencing electrical shock!**
 - j. Shut power off where applicable.
 - k. Prepare fact sheet and media statement with DCR Media personnel.

GAS LEAKS

- 1. Verify information.
- 2. Call **911**. Give location and remain on line until information is complete. Ask for advice on evacuation or sheltering in place (Chemical Accident). Clear the immediate area or evacuate building, if necessary.



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3. **Note:** If there is the smell of gas in the building do not use phones or turn on lights. Exit the building and use cell phone from outside, where smell is not present.
4. If the decision is made to evacuate the building, a voice announcement will initiate the evacuation and will include a statement concerning the designated assembly point:
 - a. **PRIMARY ASSEMBLY POINT:** West end of the main parking lot.
 - b. **ALTERNATE ASSEMBLY POINT:** North lot across the road.
5. **NOTE:** During periods of inclement weather, when evacuations are expected to last for some time, the Incident Commander will make a decision whether to move Team Members to an alternate location.

EMERGENCY GAS SHUTOFF

The Emergency Gas Shutoff is in the Hotel Basement Osotouy in the far Southeast corner very plainly Marked as the "Main Gas shut off".



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CHAPTER 11 - HAZARDOUS MATERIALS

HAZARDOUS SPILLS

Response to chemical spills shall conform to the Spill Control and Countermeasures Plan enclosed in Appendix 1.

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CHAPTER 12 - INTRUDER, TRESPASSER, VANDALISM

INTRUDER/TRESPASSER

If you see a suspicious stranger in the building:

1. Contact Security at **6083**.
2. Provide Security with the following information:
 - a. Your name.
 - b. Location of the person.
 - c. Physical description of the person.
3. If you see a weapon, notify **911** IMMEDIATELY and go to EMERGENCY PROCEDURE - WEAPON IN BUILDING.
4. Security personnel will attempt to identify the individual.

VANDALISM

1. Secure area and leave intact for investigation.
2. Security Officers need to write an Incident Report recording type and extent of damage and include pictures of the scene. File report with the Risk Manager.
3. Notify Quapaw Tribal Marshalls at their non-emergency number.
4. Maintenance Department for cleanup or barricade.
5. Remember that Team Members must wear their badge for identification at all times while they are in the building.

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CHAPTER 13 - ASSAULT

1. Call Security Dispatch at extension **6083** and provide the following information:
 - a. Your name
 - b. Location of the person
 - c. Physical description of the person
 - d. Situation
2. Do whatever you can to protect the health and safety of Team Members and visitors without putting more people at risk.
3. The Security EMT's will administer first aid.
4. After notifying Security, notify Risk Manager at Extension **6263** or **(918)919-9976**.
5. Unless injuries require the immediate attention of a doctor or indicate transfer to a hospital, keep victim in the building. If the assault involves a rape, make sure victim stays with Security or a trusted friend until police arrive. Security, Risk Management, and appropriate department staff will:
 - a. Log all activities and decisions.
 - b. Prepare fact sheet with the DCR media personnel.
 - c. Reassure concerned relatives regarding safety precautions at the facility.
 - d. Debrief Team Members.
 - e. Meet with relatives and victim(s) to plan for return to work (reasonable time after the incident).
6. Remember that Team Members must wear their badge for identification at all times while in the building.

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CHAPTER 14 - WEAPON IN THE BUILDING

WEAPON IN THE BUILDING

1. This procedure is for simple **POSSESSION** only, by other than law enforcement officers and armed Security Officers.
1. If the weapon is used against anyone, see EMERGENCY PROCEDURE - ACTIVE ATTACK.
2. If the use of a weapon is threatened or a weapon is brandished, see EMERGENCY PROCEDURE ASSAULT.

WEAPON HAS NOT BEEN SEEN IN THE BUILDING

1. If you have information /suspicion that a person has a weapon, but there has been no conformation, do not intervene yourself.
2. Call Security Dispatch at **6083** and provide the following information:
 - a. Your name
 - b. Location of the person
 - c. Physical description of the person
 - d. Situation
3. Security will call the police.
4. Let the police disarm the individual.

WEAPON HAS BEEN SEEN IN THE BUILDING

1. If a weapon is sighted, call Security Dispatch and provide the following information:
 - a. Your name
 - b. Location of the person
 - c. Physical description of the person

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d. Situation

2. Do not try and approach or apprehend the individual/ stranger or touch the weapon.
3. Remove Team Members from vicinity of intruder.
4. Secure the area or evacuate if prudent to do so.
5. Let police handle/unload/secure the weapon.
6. ***REMEMBER this CHECKLIST is for guidance only and at the time of the crisis, your common sense, combined with the prevailing circumstances must dictate your actions. Stop and consider the events and act accordingly.**

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CHAPTER 15 - ACTIVE SHOOTER

An “Active Shooter” is a person who appears to be actively engaged in killing or attempting to kill people in a populated area; in most cases active shooters use firearm(s) and there is no pattern or method to their selection of victims. These situations are dynamic and evolve rapidly, demanding immediate deployment of law enforcement resources to stop the shooting and mitigate harm to innocent victims.

PROCEDURES

In general, how you respond to an active shooter will be dictated by the specific circumstances of the encounter, bearing in mind there could be more than one shooter involved in the same situation. If you find yourself involved in an active shooter situation, try to remain calm and use these guidelines to help you plan a strategy for survival.

If the Active Shooter is outside your building:

1. Proceed to a room that can be locked, close and lock all the windows and doors, and turn off all the lights.
2. If possible, get everyone down on the floor and ensure that no one is visible from outside the room.
3. One person in the room should call Security Dispatch at **6083** and advise the dispatcher of what is taking place. Inform him/her of your location.
4. Remain in place until the police or a Security Officer known to you gives the “all clear.” Unfamiliar voices may be the shooter attempting to lure victims from their safe space. Do not respond to any voice commands until you can verify with certainty that they are being issued by a Security Officer.

If an active shooter is in the same building you are:

1. Determine if the room you are in can be locked and if so, close and lock all the windows and doors, and turn off all the lights.
2. If possible, get everyone down on the floor and ensure that no one is visible from outside the room.

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3. One person in the room should call Security Dispatch at **6083** and advise the dispatcher of what is taking place. Inform him/her of your location.
4. Remain in place until the police or a Security Officer known to you gives the "all clear." Unfamiliar voices may be the shooter attempting to lure victims from their safe space. Do not respond to any voice commands until you can verify with certainty that they are being issued by a Security Officer.
5. If your room can't be locked, determine if there is a nearby location that can be reached safely and can be locked, or if you can safely exit the building.
6. If you decide to flee during an active shooting situation, make sure you have an escape route and plan in mind. Do not attempt to carry anything while fleeing; move quickly, keep your hands visible, and follow the instructions of any police officers you may come in contact with.

If an active shooter enters your office:

1. Try to remain calm. Call Security Dispatch at **6083** if possible and alert Security to the shooter's location. If you can't speak, leave the line open so the dispatcher can listen to what's taking place.
2. If there is no opportunity for escape or hiding, it might be possible to negotiate with the shooter. Attempting to overpower the shooter with force should be considered a very last resort after all other options have been exhausted.
3. If the shooter leaves the area, proceed immediately to a safer place and do not touch anything that was in the vicinity of the shooter.

AFTER THE SHOOTING

1. Do not attempt to remove injured people; instead, leave wounded victims where they are and notify Security or law enforcement authorities of their location as soon as possible.
2. Do not try to leave until advised it is safe to do so by police or Security.

What to expect from responding police officers:



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1. Police officers responding to an active shooter are trained in a procedure known as Rapid Deployment and they proceed immediately to the area in which shots were last heard. Their purpose is to stop the shooting as quickly as possible.
2. The first responding officers will normally be in teams. They may be dressed in regular patrol uniforms, or they may be wearing external bulletproof vests, Kevlar helmets, and other tactical equipment. The officers may be armed with rifles, shotguns, or handguns, and might also be using pepper spray or tear gas to control the situation. Regardless of how they appear, remain calm, do as the officers tell you, and do not be afraid of them.
3. Put down any bags or packages you may be carrying and keep your hands visible at all times.
4. If you know where the shooter is, tell the officers.
5. The first officers to arrive will not stop to aid injured people. Rescue teams composed of other officers and emergency medical personnel will follow the first officers into secured areas to treat and remove injured persons.
6. Keep in mind that even once you have escaped to a safer location, the entire area is still a crime scene. Police will usually not let anyone leave until the situation is fully under control and all witnesses have been identified and questioned. Until you are released, remain at whatever assembly point authorities designate.

Some things to do or not do:

1. Do not sound the fire alarm. A fire alarm would signal the occupants to evacuate the building and thus place them in potential harm as they attempted to exit.
2. Lock the windows and close blinds or curtains.
3. Stay away from the windows and doors.
4. Turn off lights and all audio equipment.
5. Keep occupants calm, quiet, and out of sight.
6. Keep everyone together.



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7. Take adequate cover/protection, i.e. concrete walls, thick desks, filing cabinets (cover may protect you from bullets).
8. **THIS IS ONLY A GUIDELINE. THIS IS NO ABSOLUTE PROCEDURE. THESE SITUATIONS ARE DYNAMIC AND EVOLVE RAPIDLY. THE BEST WAY TO APPROACH AN ACTIVE SHOOTER SITUATION IS TO REMAIN CALM AND MOVE TO SAFETY IF POSSIBLE.**

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CHAPTER 16 - ARMED ROBBERY

ARMED ROBBERY PROCEDURES

1. Team Members avoid actions that might cause danger to themselves or others.
 - a. Remain as calm as possible. The suspect may be as nervous and as scared as you are.
 - b. Avoid quick or unnatural movements that might cause the suspect to react.
 - c. Consider all firearms loaded and dangerous.
 - d. Consider the suspect armed and dangerous even though a weapon is not displayed.
 - e. Contact Security if it can be done safely out of view of the robbery suspect and activate silent alarm if possible.
2. Team Members should cooperate with all demands made by the suspect.
 - a. Do not attempt a physical confrontation. **DO NOT CHASE THE SUSPECT.**
 - b. Do not answer the phone unless they tell you to.
 - c. Be careful not to say anything that might provoke the suspect.
 - d. If the suspect uses a note, let it drop on the counter. Do not touch it.
 - e. If you are unable to retain the note, recall its contents, language peculiarities and whether it is printed or in writing.
 - f. Be aware of things that the suspect touches, such as the counter, an ash tray or a handy wipes container.
 - g. Try to remember as much as possible about the suspect(s), such as:
 - i. Race and gender
 - ii. Height and weight



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- iii. Color of eyes and hair
 - iv. Speech patterns and accents
 - v. Scars, marks, moles and tattoos
 - vi. Left or right handed
 - vii. Type of weapon (revolver or automatic, chrome or blue, caliber, type of grips)
 - viii. Clothing and shoes
 - ix. Glasses or hat
- h. Try to observe the method and route of escape taken by the suspect.

POST-ROBBERY PROCEDURES

1. Contact Security Dispatch at extension **6083** as soon as it is safe to do so.
2. Security Personnel/Surveillance will attempt to obtain vehicle description and/or License plate number.
3. Team Members directly involved in an armed robbery should contact their supervisor after Security Dispatch has been notified. Supervisors will remove any Team Member directly associated with the robbery from their post as soon as possible. The Team Member will not discuss the incident with anyone except their supervisor, Security or law enforcement officers.
4. Do not discuss the incident with the news media. Providing information to the news media is the sole responsibility of the General Manager, Assistant General Manager, Public Relations Manager, or Marketing Director. Consultation between these and other positions should occur before any release is made.

SECURITY DEPARTMENT RESPONSIBILITIES

1. After receiving information, Security will immediately notify:



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- a. Surveillance – Try to obtain vehicle description, license plate number and video of anything related to the incident.
 - b. Quapaw Marshals
 - c. Other Law Enforcement Agencies
 - d. General Manager/Assistant General Manager
 - e. Risk Manager
 - f. Quapaw Tribal Gaming Agency
2. Check for injuries and notify medical services if necessary.
 3. Protect the crime scene, allow no one in the affected area, and wait for Law Enforcement.
 4. Gather information for the robbery report. Copies of this report will be given to the General Manager or Assistant General Manager and the Risk Manager.



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CHAPTER 17 - EXTORTION/KIDNAP

EXTORTION/KIDNAP

1. Extortion demands may be received by several means such as telephone, in person, mail, a note or E-mail. The demands will usually be accompanied by some threat of what will happen if demands are not met.
2. No matter how the demands are received, extortion demands must be immediately referred to the Security Manager. The Security Manager will ensure that the following are notified:
 - a. Quapaw Marshalls
 - b. General Manager or Assistant General Manager
 - c. Security Director
3. The person receiving the threat will immediately complete an Extortion/Kidnap report.

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EXTORTION/KIDNAP INITIAL REPORT

Date: _____ Time: _____ Caller ID Display: _____

Exact Wording of the

Threat/Demand: _____

Questions to Ask the Caller:

Why are you doing this? _____

Who is this? _____

Is this a prank? _____

Where are you calling from? _____

What do you want? _____

(If kidnap/hostage situation) May I talk with _____?

Is he/she all right? _____

What is he/she wearing? _____

Is there anything else I need to know? _____

Type of Speech: (Check all that apply)

- | | | | | |
|--|----------------------------------|-----------------------------------|----------------------------------|------------------------------------|
| <input type="checkbox"/> Calm | <input type="checkbox"/> Angry | <input type="checkbox"/> Excited | <input type="checkbox"/> Slow | <input type="checkbox"/> Rapid |
| <input type="checkbox"/> Soft | <input type="checkbox"/> Loud | <input type="checkbox"/> Laughter | <input type="checkbox"/> Crying | <input type="checkbox"/> Normal |
| <input type="checkbox"/> Distant | <input type="checkbox"/> Slurred | <input type="checkbox"/> Nasal | <input type="checkbox"/> Stutter | <input type="checkbox"/> Lisp |
| <input type="checkbox"/> Raspy | <input type="checkbox"/> Deep | <input type="checkbox"/> Ragged | <input type="checkbox"/> Accent | <input type="checkbox"/> Disguised |
| <input type="checkbox"/> Familiar <input type="checkbox"/> Whispered <input type="checkbox"/> Cracking Voice | | | | |

Background Sounds: (Check all that apply)

- | | | | |
|--|---------------------------------------|--|---------------------------------|
| <input type="checkbox"/> Street Noises | <input type="checkbox"/> Machinery | <input type="checkbox"/> Animal Noises | <input type="checkbox"/> Voices |
| <input type="checkbox"/> PA System | <input type="checkbox"/> House Noises | <input type="checkbox"/> Crying | <input type="checkbox"/> Motor |
| <input type="checkbox"/> Clear | <input type="checkbox"/> Static | <input type="checkbox"/> Children | |
| <input type="checkbox"/> Long Distance | <input type="checkbox"/> Local | <input type="checkbox"/> Pay Phone | |

Threat Language: (Check all that apply)

- | | | |
|--|-------------------------------------|-------------------------------|
| <input type="checkbox"/> Well Educated | <input type="checkbox"/> Incoherent | <input type="checkbox"/> Foul |
| <input type="checkbox"/> Taped | <input type="checkbox"/> Read | |

Sex of Caller: _____ Age: _____ Race: _____

Did the caller say they will call again? Yes _____ No _____

If yes, what time of day will they call? _____

Approximately how long did you speak with the caller? _____

Your Name _____ Title/Position _____

Signature: _____

Report immediately given to: _____

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CHAPTER 18 - SUICIDE/DEATH

THREATS OR ATTEMPTS TO COMMIT SUICIDE

Be aware that a person who is threatening or has attempted suicide is a very real threat to any person in the area. They have emotional problems, are in a state of depression and believe they have exhausted all possible alternatives to suicide.

In the event of a threatened or attempted suicide, the following procedures shall be followed:

1. Remain calm and use extreme caution.
2. Notify Security Dispatch immediately at extension **6083**. Advise them if the suspect is alone or with someone. Try to obtain the suspect's name.
3. Certain attitudes should be used when dealing with such a suspect.
 - a. Assume a gentle but positive attitude
 - b. Use a soft, calm, reassuring voice
 - c. Be friendly
 - d. Protect yourself from possible danger from the intended suicide victim
 - e. Avoid specific conversation related to the victim's problems.
4. DO NOT contact Family Members, Clergy or Friends.

Chemical Suicide

1. If there is suspicion or knowledge that the suicide will be a chemical suicide revert to training about chemical suicide if applicable.
2. Look through the windows to identify information.
3. Alert Security who will contact Emergency Services.



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4. Identify if the subject is conscious and capable of leaving the area that the chemicals were mixed. (Vehicle, Hotel Room, Restroom, etc.)
5. Keep patrons and Team Members away from the area and follow all instructions by Security and Emergency Personnel.

Security Responsibilities for Chemical Suicide

1. Identify if it is a chemical suicide.
2. Remove patrons and Team Members from the area and stay up-wind if outside. If the situation is inside, evacuate the immediate area. If in the hotel, evacuate the floor of the chemical suicide, and the floor above and below.
3. Contact Facilities to shut off air movement systems including AC/Heating.
4. Protect the scene until Emergency Personnel arrive and take over the situation.

Facilities Responsibilities

1. Once contacted shut down all air movement systems for the effective area.
2. Assist Security and Emergency Personnel until the area has been deemed safe and secure

Security Dispatch

1. Security Dispatch will notify:
 - a. The Security Supervisor
 - b. Quapaw Marshalls
 - c. Surveillance
 - d. QTGA Compliance Agent
 - e. Quapaw EMS/Fire (for Chemical Suicide)



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Security Supervisor

1. Respond immediately to the scene and assume command.
2. Clear the area of all persons who have no business there. Often persons threatening or attempting suicide are doing it to obtain attention and if this is kept to a minimum, the odds of keeping the person from trying are much better.
3. Any existing danger must be removed, if possible, without disturbing the suspect. Care must be taken to protect everyone involved from harm.
4. Only one person should deal directly with the suspect to avoid confusion and build trust.
5. The incident will be turned over to law enforcement officers upon their arrival. Security Officers will remain and assist as directed by law enforcement.
6. The final disposition of the suspect will be determined by the actions of the suspect and the decision of law enforcement officers involved in the incident.
7. Security Supervisor will gather information for an incident report and obtain a case number. The Security Supervisor may have to give a statement to Law Enforcement.

POST SUICIDE OR UNATTENDED DEATH INCIDENT

1. Any Team Member who discovers a suicide victim or a victim of unattended death will contact their supervisor immediately. The supervisor will notify Security Dispatch immediately at extension **6083**.
2. Stand by until Security arrives and do not let anyone near the area except Security, law enforcement officers and medical personnel.
3. The incident may appear to be a suicide or unattended death when in reality it could be a homicide. Treat all deaths as a homicide. Do not touch or disturb anything except to determine life signs of the victim. If you do inadvertently touch something, report it to responding Security Officers or law enforcement.
4. If bodily fluids are exposed, take extreme precaution to avoid touching them.



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5. Avoid making any comments or statements to anyone other than Security or law enforcement officers.

Security Dispatch

1. Security Dispatch will notify:
 - a. Security Supervisor
 - b. Emergency Medical Technician
 - c. Quapaw Marshalls
 - d. Surveillance
 - e. Manager on Duty

Security Supervisor

1. Take control of and secure the scene and do not allow anyone except law enforcement officers and medical personnel near the area.
2. Do not touch anything.
3. Clear the area of all persons who have no business there. Friends and relatives of the victim should be removed from the area and placed in a quiet environment, such as a vacant hotel room or conference room. Assign a Security Officer to them to obtain information and see to their needs.



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CHAPTER 19 - DEATH OF A TEAM MEMBER

IN CASE OF DEATH OFFSITE THAT INVOLVES A TEAM MEMBER DURING WORKING HOURS:

1. Confirm death with police before taking any actions.
2. Secure the area if possible.
3. Notify Risk Manager.

IN THE CASE OF DEATH ONSITE:

Call Security Dispatch at Extension **6083**. Security will then:

1. Clear other Team Members from the area.
2. Do not move person or any evidence if this may be a crime scene. Secure the area until the police arrive.
3. Notify the General Manager or Assistant General Manager.
4. Log activities and decisions.
5. Inform Human Resources.
6. Prepare fact sheet and media statement with DCR Media personnel.
7. Provide counseling for other Team Members if needed.
8. Create a master list of Team Members affected for intervention purposes.
9. Send affected Team Members sent to a designated area.
10. Collect information concerning the circumstances of the death.
11. Plan long-term response and follow-up counseling by outside professionals as needed.



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12. Assist the supervisor or manager in the completion of the accident investigation and report forms if applicable.



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CHAPTER 20 - HANDLING INJURED TEAM MEMBERS

PROCEDURES FOR HANDLING INJURED TEAM MEMBERS

Injured Team Member's Responsibilities

1. Notify their supervisor (or acting supervisor) as soon as possible after injury.
2. As soon as possible following treatment, the injured Team Member must contact the Risk Manager with information and corresponding paperwork from the treating physician and for further instructions.

Supervisor's Responsibilities

1. Supervisor must contact Security immediately.
2. If the Team Member is sent to an outside medical facility for treatment, contact the Risk Manager 24/7 at **(918)919-9976** stating their (injured Team Member's supervisor) name and contact information, the injured Team Member's name and any other pertinent information.
3. Complete a Supervisor's Investigation Report and forward it to Risk Management. Forms can be obtained through Security or Risk Management.
4. Notify Human Resources (Ext. **6231**) and Risk Management (Ext. **6263**) immediately if the injured Team Member misses any part of their scheduled shift as a result of an accident. NOTE: While supervisors may send Team Members home when work is slow, supervisors CANNOT send Team Members home due to a work related injury. That decision must be made by a physician.
5. If a Team Member is on work restrictions due to a work related injury, every attempt should be made to accommodate the Team Member's restrictions so that they can continue to report to work.
6. The supervisor is responsible for keeping the Risk Manager informed throughout this process until the injured Team Member is back to work with no restrictions.



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Security Officers and EMT's Responsibilities

1. Respond to the injury and determine whether or not an EMT is needed. If an EMT is needed, Security will radio EMS for their assistance.
2. Assess the situation and administer first aid as necessary. If it is determined that the injured Team Member should be referred for further medical assistance, contact Quapaw Tribe Fire/EMS.
3. If Team Member needs to be sent to a medical facility for additional treatment, they will be sent to Freeman Hospital/Clinics.
4. Obtain Team Member's name (indicating that they are a Team Member), supervisor name, department, job title, what happened, precisely where it happened, what day and time it happened.
5. Complete an Incident Report and secure signed Witness Statements from all witnesses. Originals of everything must be sent to the Risk Manager immediately so that a claim can be filed.
6. Notify Linda Shipman, Risk Manager of the incident if it results in the injured worker being treated by an outside medical facility 24/7 at **(918)919-9976**.
7. Obtain a Refusal of Treatment and/or Transportation and be sure to circle which is applicable if the injured individual doesn't wish to have treatment or be transported to a medical facility.
8. If the injured Team Member is sent to the hospital by ambulance and is not hospitalized, and the Team Member does not have transportation back to DCR through family or friends, Security may be contacted when the Team Member has completed their treatment and Security will provide transportation back to DCR.

Risk Manager's Responsibilities

1. Notify the Supervisor (using the contact information supplied by the supervisor) and Human Resources if the injured worker is placed on restrictions or is unable to return to work.
2. Submit a Tribal Worker's Benefits claim for all workplace injuries meeting TWB guidelines.
3. Approve prescription purchases and forward medical approvals to the insurance company.



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4. Work together with the injured worker's supervisor to develop a plan for injured workers that have been placed on modified duty.
5. Monitor all Supervisors' Investigation Reports and follow-up on any changes, training, etc. that need to be completed to reduce or eliminate the possibility of the same type of accident happening again.
6. Determine if accident is defined as "Recordable" and if so, enter it on the OSHA 300 Log.

PROCEDURES FOR HANDLING INJURED GUESTS

Security Officer's and EMT's Responsibilities

1. Respond to the injury and determine whether or not an EMT is needed. If an EMT is needed, Security will radio for their assistance. Master key for hotel room access can be obtained from Security Dispatch.
2. Assess the situation and administer first aid as necessary. If it is determined that the injured guest should be referred for further medical assistance by ambulance, you will need to ask the guest what hospital they prefer. If they do not wish to be transported, have them sign a Refusal of Treatment and/or Transportation.
3. Obtain guest's name (indicating that they are a guest), their address, telephone number, what happened, precisely where it happened, what day and time it happened. Never admit guilt or that we will pay for anything. This must be determined by our insurance company.
4. Complete an Incident Report and secure signed Witness Statements from all witnesses.
5. Originals of everything must be sent to the Risk Manager immediately so that a claim can be filed if necessary.
6. Notify Linda Shipman, Risk Manager of the incident if it results in the injured guest being treated by an outside medical facility 24/7 at **(918)919-9976**.
7. Obtain a Refusal of Treatment and/or Transportation and be sure to circle which is applicable if the injured individual doesn't wish to have treatment or be transported to a medical facility.



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Risk Manager's Responsibilities

1. Notify the Quapaw Tribal Gaming Agency, CFO, and General Manager or Assistant General Manager of any guest injuries resulting in medical assistance.
2. Secure from Surveillance any related video.
3. Secure from Security anything else related to the injury.
4. File a General Liability claim.
5. Make copies of everything for the Quapaw Tribal Gaming Agency, CFO, and General Manager or Assistant General Manager.
6. Contact the injured individual and express concern for their injury. Do not admit fault or commit to paying for anything.

ACCIDENT INVESTIGATION REPORTS

1. Accident Investigation Reports should be filled out whether the accident victim was a guest or Team Member. The focus of the accident investigation is to identify the cause(s) of the accident.
2. Some things to look for:
 - a. Type of footwear
 - b. Distractions present
 - c. Surface of accident scene,
 - d. Specific unsafe acts and the reasons for those acts,
 - e. Specific unsafe conditions, equipment involved, etc.
3. There is a method of cause factor identification called "Root Cause Analysis." Root cause analysis is nothing more than asking "why" to the 5th power. No matter which method you utilize to determine the root cause, always make sure that you initiate corrective actions based on that root cause. Corrective actions initiated on the basis of root causes tend to be longer lasting and are more effective. List the root cause and the corrective actions on each accident report form.

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4. It is always important to have photographs or video of the accident scene, written statements from the participants and witnesses, insurance information for all people involved who are not Team Members, and notes from the investigating supervisor.
5. In an effort to better identify those areas needing attention and to ensure that we expend our valuable resources in the areas most warranted, it is important that supervisors and managers who investigate accidents perform a thorough investigation. The Team Member or visitor who experienced the accident should not be given the incident report to complete; the responsible manager, supervisor or designated person must conduct the accident investigation and complete the incident form.
6. Once the investigation is completed and the causes are identified, corrective actions and preventive measures can be determined. The most important part of the accident sequence is the identification and collection of information on which the findings of the investigation are based. We must take advantage of every opportunity to prevent similar occurrences. Keep in mind that the extent of the investigation and the time expended on the collection of data should be commensurate with the potential for loss or gain by the Team Member or visitor. For example, a simple slip might include only a cursory investigation and the serious injury of a Team Member due to an ergonomic exposure or vehicle accident might require an extensive investigation to include interviews, photographs etc.
7. After the collection of information, photographs, statements, driver identification data, Insurance information etc., the incident report is completed to include primary and contributing cause factors. At that point, DCR management becomes responsible for correcting unsafe conditions and eliminating unsafe acts that led to the accident and at that time the "Root Cause Analysis" is used to identify root causes as well as contributing causes.



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APPENDIX 1:

Downstream Casino Resort Spill Prevention Control and Counter measures Plan

DOWNSTREAM CASINO RESORT SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

Prepared by

***Quapaw Tribe of Oklahoma
Environmental Office
P.O. Box 765
Quapaw, OK 74363
918-542-1853***

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DESIGNATED EMERGENCY COORDINATORS

1. The On-site Risk Manager should be contacted, whenever there is an imminent or actual emergency. This individual has had training in responding to emergency situations.
2. In all emergencies the safety of personnel is the first priority.
3. SPILL EMERGENCY COORDINATORS

<i>NAME</i>	<i>OFFICE</i>	<i>HOME</i>	<i>CELL</i>
<i>Linda Shipman- Risk Manager</i>	<i>918-919-6263</i>		<i>918-919-9976</i>
<i>Tim Kent (off-site)</i>	<i>918-542-1853</i>	<i>417-624-9952</i>	<i>918-533-2592</i>
<i>Leon Crow (on-site)</i>	<i>918-673-1709</i>	<i>918-678-2768</i>	<i>918-533-4483</i>

4. FIRE DEPARTMENT AND PARAMEDICS: 911
5. CITY OF JOPLIN EMERGENCY MANAGEMENT COORDINATOR:
(417) 624-0820 ext. 260 – Mr. Keith Stammer
6. QUAPAW TRIBE FIRE/EMS DEPARTMENT:
(918) 673-1709 – Mr. Leon Crow
7. OTTAWA COUNTY EMERGENCY MANAGEMENT COORDINATOR:
(918) 541-9391– Mr. Frank Geasland
8. BUREAU OF INDIAN AFFAIRS MUSKOGEE AREA OFFICE ENVIRONMENTAL SERVICES
(800) 204-0552
9. BUREAU OF INDIAN AFFAIRS MIAMI AGENCY
(918) 542-3396



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- 10. BUREAU OF INDIAN AFFAIRS POLICE
(918) 542-3396

- 11. OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY (Miami Office)
(918) 542-0150

- 12. MISSOURI DEPARTMENT OF NATURAL RESOURCES (Environmental Emergency Response)
(573) 634-2436

- 13. KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
(hazardous materials spills and air releases)
(800) 275-0297

- 14. NATIONAL RESPONSE CENTER (EPA)
(800) 424-8802

INTRODUCTION

This SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN describes the steps that must be taken by all personnel to situations at the Downstream Casino Resort which pose a real or potential threat to human health or the environment. The provisions of this plan must be carried out immediately whenever there is an unplanned sudden or non-sudden release of hazardous chemicals, diesel, gasoline, or oil constituents to air, soil, or water which could threaten human health or the environment. A storm water pollution prevention plan (SWPPP) has also been generated for the facility and is applicable during construction. The SWPPP is under a separate cover but also has spill prevention and countermeasure procedures for construction contractors outside of the Downstream Casino Resort buildings.

ARRANGEMENTS WITH LOCAL AUTHORITIES. The Quapaw Tribe Fire Department, the BIA, and the City of Joplin Emergency Management Coordinator will respond to any emergency at the Downstream Casino Resort upon request. These agencies have been notified that the Downstream Casino Resort stores fuel and small quantities of cleaning chemicals supplies.



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SPILL PREVENTION

Under the Emergency Planning and Community Right-to-Know Act (EPCRA), Congress designated 360 “extremely hazardous substances” that require the reporting of releases to state and local authorities. The reportable quantities (RQs) for the extremely hazardous substances are based on the substance's acute lethal toxicity. The Comprehensive Environmental Response Compensation and Liability Act (CERCLA), also known as the Superfund Law, contains a list of “CERCLA hazardous substances” which also have reportable spill quantities. Both the EPCRA list and CERCLA list are enclosed in appendix 1-1. Any release (including spills) of chemicals on these lists in a quantity equal to, or exceeding, the Reportable Quantity (RQ) listed for these chemicals, must be reported to EPA’s National Response Center (800-424-8802) and any applicable state agency.

The Environmental Protection Agency (EPA) prepared an Oil Pollution Prevention Regulation (OPPR) and published it in Volume 38, Number 237, of the Federal Register on December 11, 1973. This regulation addresses non-transportation related facilities and is further explained in Title 40, Code of Regulations (CFR), Part 112. The main requirement for facilities subject to the regulation is the preparation and implementation of a Spill Prevention Control and Countermeasures (SPCC) Plan.

Facilities with combined (indoor and outdoor), above-ground oil storage capacity(not actual gallons on site) dedicated to any of the regulated materials greater than 1,320 gallons or a completely buried storage capacity greater than 42,000 gallons must comply with the SPCC requirement. The Downstream Casino Resort facility currently stores fuel (diesel and gasoline) in above-ground tanks for emergency generators and landscape maintenance equipment. The storage capacity exceeds the 1,320-gallon threshold.

Note: All handling, storage, and disposal of solid and liquid waste (including hazardous substances) shall conform to Quapaw Code Title 15, specifically, the Solid Waste Code and the Toxic and Hazardous Substance Control Code.



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RESPONSIBILITIES

General Manager or Assistant General Manager

The General Manager or Assistant General Manager is responsible for overseeing the operations of the Downstream Casino Resort.

Downstream Casino Resort Risk Manager

The Risk Manager is responsible for overseeing activities related to safety and emergency response at the Casino and Hotel, including chemical/petroleum product storage and the overall safety aspects of the operation and the maintenance of the physical facility. The Risk Manager also is the primary coordinator of the spill response team. In the event of a spill, the Risk Manager will report the incident to the Quapaw Tribal Environmental Office (QTEO). The Risk Manager is also responsible for ensuring the staff of the Downstream Casino Resort is routinely trained on the proper procedures for responding to potential spills.

Downstream Casino Resort Facility Shift Supervisor

The Facility Shift Supervisor is responsible for making initial assessments and controlling their section activities during their shift times. During an incident, the Facility Shift Supervisor also is responsible for notifying the Risk Manager and QTEO. The Facility Shift Supervisor will respond according to the pre-approved Spill Response Plan and any related standard operating procedures.

Downstream Casino Resort Safety Committee

The primary responders comprise a Committee supervisor and pre-determined Committee team members. As responders, the Safety Committee Spill Response Team is responsible for immediately mobilizing and acting on any chemical and/or fuel spills that occur at the Downstream Casino Resort. Team members will coordinate their response activities with the QTEO.



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Quapaw Tribal Environmental Office (QTEO)

QTEO is responsible for acting as reserve primary responders to the spill response team. If necessary, QTEO will provide on-site response support, including personnel and equipment if available. QTEO also is responsible for making the determination whether additional assistance is necessary, such as from the State or BIA Hazardous Materials (HAZMAT) Team. If a release occurs, the QTEO, along with the Risk Manager, is responsible for notifying the appropriate agencies if necessary.

Quapaw Tribe Fire/EMS Department

The Quapaw Tribe Fire/EMS Department has a station at the Downstream Casino Resort site and will respond to fire and medical emergencies at the Downstream Casino Resort.

SITE AND EQUIPMENT DESCRIPTIONS

Site Overview

The Downstream Casino Resort is located at 69300 Nee Road approximately 15 miles northeast of Quapaw, Oklahoma and immediately north of Interstate 44.

According to the Soil Survey of Ottawa County, Oklahoma, soils at this consist of cherty silt loams. Perched groundwater is generally found above bedrock which consists of weathered cherty limestone while the shallow-most permanent aquifer is within Mississippian age formations between 150 – 300 feet in depth.

The surface elevation slopes toward the south and surface water drains into ephemeral creeks south of the casino. These creeks ultimately discharge to westerly flowing Five Mile Creek approximately one mile south of the property.

Chemicals and petroleum products stored at the Downstream Casino Resort facility include fuel (gasoline, diesel, and natural gas liquids), small quantities of cleaning chemicals, and small quantities of chemicals associated with maintenance of the resort's cooling towers.



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The fuel storage includes two small elevated above-ground storage tanks (ASTs) near the northern property boundary, and diesel fuel tanks attached to three large emergency generators. Regarding these ASTs, it should be noted that the capacity of at least one single container is more than 660 gallons, and the aggregate aboveground storage capacity of all of the ASTs is more than 1,320 gallons; therefore, the ASTs are subject to the requirements of Title 40, Code of Regulations (CFR), Part 112. Each of the ASTs are equipped with secondary containment structures: the two small elevated tanks near the north property boundary are within stainless steel livestock tanks while the diesel tanks for the three large diesel generators are double-walled and equipped with leak detection systems.

Small quantities of cleaning chemicals are dispersed throughout the resort facilities. Ethylene glycol associated with the cooling towers is stored in the boiler room and a small room in the administration building from which it (Ethylene Glycol) is pumped to the cooling tower on the roof.

Material Safety Data Sheets (MSDS) of all chemicals used at the Downstream Casino Resort are on file with the on-site Risk Manager and at the offices of the Quapaw Tribe Environmental Department. The appropriate MSDS are also located at each indoor chemical storage area.

SPILL HISTORY

To date, there have no spills at the subject property.

SPILL SCENARIOS AND PREVENTATIVE MEASURES

There are many scenarios that may cause a chemical/petroleum product. The following list of the most likely based on the process and equipment used:

1. Truck driver delivering chemical/petroleum products crashes into a fixed structure or another vehicle on, or near, the Downstream Casino Resort facility. The accident with the structure or a vehicle punctures the tanker truck and causes the chemical/petroleum product to spill onto the ground.

Spill prevention measures include:

- a. Ensuring Downstream Casino Resort selects a reputable chemical (cleaning supply) vendor and fuel supply vendor that employ safe and reliable drivers.



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- b. Downstream Casino Resort Facility Shift Supervisors reviewing the vendor's standard operating procedures for drivers when they arrive at a facility.
 - c. Preparing operational procedures for the delivery truck driver to follow upon arriving on Tribal property.
 - d. Providing clear access to the transfer area.
2. Petroleum product delivery truck equipment (i.e., connectors, hose, and shut-off valve) malfunctions. Worst-case scenario assumes the maximum quantity spilled would be 10,000 gallons of spilled fuel, which would flow onto the ground.

Spill prevention measures include:

- a. Ensuring vendor's truck and hoses have safety shut-off valves or an override system in case a malfunction does occur.
 - b. Preparing operational procedures for the delivery truck driver to follow upon arriving on Tribal property.
3. Petroleum product delivery truck operator overfills the tank or pulls away with the hoses still connected. Worst-case scenario assumes 1,000 gallons of fuel would flow onto the ground or into the aboveground tank containment basin, which would overflow and run onto the ground.

Besides tank secondary containment system, additional spill prevention measures could include:

- a. Ensuring vendor has appropriate procedures that will allow the driver to perform the task with minimal risk of accidental spills.
- b. Reviewing vendor operating procedures with Director of Facilities to ensure best transfer practices are being used.
- c. Ensuring an automatic shut-off switch discontinues fuel flow when the fuel equals the fill-to line.

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4. Fuel AST equipment (i.e., connectors and hose) malfunctions. As a projected worst-case scenario, 300 gallons would flow onto the ground or the aboveground tank catch basins.

Spill prevention measures shall include:

- a. Performing routine preventative maintenance checks to ensure transfer equipment is functioning properly.
- b. Performing routine checks of the aboveground tank containment basin to identify and contain leaks early.
- c. Strategically place spill kits near all fuel storage facilities in case fuel spills onto the ground around the fuel supply vehicle.

RECOMMENDATIONS

- a. Prepare standard operating procedures for fuel delivery operations, emergency equipment shutdowns, and emergency response team action using spill kits.
 - b. Review and update fuel spill-related operating procedures annually.
 - c. Place emergency response team standard operating procedures with the spill kits located near the ASTs.
 - d. Conduct quarterly training workshops on fuel spill prevention and response procedures for appropriate employees. This training is to include reviewing the SPCC and hands on emergency response drills.
5. Chemicals used for cleaning and maintenance are spilled inside the Downstream Casino Resort facility.

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Spill prevention measures shall include:

- a. Ensure that cleaning/maintenance liquids are stored in small containers and that any large containers are stored inside lockable cabinets with secondary containment capacity.
- b. Any 55-gallon drums containing chemicals shall be placed within secondary containment structures.
- c. Preparing operational procedures for using and transferring liquids.
- d. Liquids absorbent supplies (spill kits) shall be placed in Chemical liquids storage areas to be used in case of spills.
- e. MSDS sheets for all stored liquids shall be placed in the Cleaning/maintenance liquids storage area.

RECOMMENDATIONS

- a. Place spill response kits near all chemical/petroleum product storage areas along with copies of all applicable MSDS sheets.
- b. Prepare standard operating procedures for chemical/petroleum product delivery operations and emergency response team action using spill kits.
- c. Review and update fuel spill-related operating procedures annually, and when site conditions related to chemical/petroleum product storage and use change substantially.
- d. Place emergency response team standard operating procedures with the all spill kits. MSDS should also be placed in the appropriate storage areas; MSDSs will have instructions for the recommended clean-up procedures.
- e. Conduct quarterly training workshops on spill prevention and response procedures for employees. This training is to include reviewing the SPCC and hands on emergency response drills.

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SPILLS/LEAKING CONTAINERS

A SPILL is defined as an unexpected release of any material from a container. For operational purposes, spills of hazardous materials will be divided into two levels:

1. **SMALL SPILLS** are defined as less than or equal to 5 gallons of non-hazardous material. In most instances, for “EPCRA Extremely Hazardous Substances” or “CERCLA Hazardous Substances” (a list for each of these types of substances is enclosed in appendix 1-1), spills of less than 1pound (or 1 gallon of liquid containing the chemical) will be considered small spills. Small spills may, at the discretion of the employees involved, be handled directly by personnel in the immediate area who are familiar with the associated hazards and the use of spill kits. The appropriate MSDSs will have instructions for the recommended clean-up procedures.
 - a. In the case of fuel spills, a spill of less than 25 gallons will be considered a small spill and may be addressed by utilizing the nearby spill kit.
2. **MAJOR SPILLS** are defined as equal to, or greater than, the “Reportable Quantity” (RQ) of any “EPCRA Extremely Hazardous Substance” or “CERCLA Hazardous Substance” Section 313 Chemical” (see appendix1-1). In most instances, for “EPCRA Extremely Hazardous Substances” or “CERCLA Hazardous Substances” (a list for each of these types of substances is enclosed in appendix 1-1), the Reportable Quantity is from a release greater than 1 pound over any 24-hour period. Therefore, any spills of chemicals (other than fuel) of 1pound (or 1 gallon of liquid containing the chemical) or more, occurring over any 24-hour period, will be considered a major spill until the Risk Manager determines if the spill is large enough to be considered a Reportable Quantity. Major spills must be immediately reported to the Emergency Coordinator and Risk Manager so that emergency assistance will be available if needed. Employees should leave the immediate area until assistance arrives.
Note: Fuel spills in excess of 25 gallons should be considered “major” and should be reported to the appropriate regulatory agency depending on the where the spill occurs (Kansas Department of Health and Environment; Oklahoma Department of Environmental Quality; Missouri Department of Natural Resources; or Environmental Protection Agency for spills on trust land). See Section VI for reporting procedures.
3. A LEAK is a release from a container via a puncture or other small opening of a weak spot in the container. Leaks will be treated as small spills unless they result in a rapid discharge of material that equals or exceeds the Reportable Quantity of a chemical listed in appendix 1-1, or unless the leak results in a release that equals or exceeds the Reportable Quantity, of a chemical listed in appendix 1-1, in any 24-hour period.

EMERGENCY OPERATING PROCEDURES

Revised 4/15/2013

SPILL RESPONSE

IN THE EVENT OF A SPILL, use the following checklist:

CHECKLIST - CHEMICAL/PETROLEUM PRODUCT ACCIDENT

- ☐ Report the spill to the on-site Risk Manager who will determine if the spill is “small” or “major”.
- ☐ If the on-site Risk Manager is not immediately available, notify your shift supervisor who will determine whether the spill is “small” or “major” by checking the names of the chemicals on the MSDS against the lists of “EPCRA Extremely Hazardous Substances” and “CERCLA Hazardous Substances” found in appendix 1-1. If any of the chemical/petroleum products spilled is on these lists and the amount spilled is in excess of the “reportable quantities”, the spill is major. **Note: Fuel spills in excess of 25 gallons should be considered “major” and should be reported to the Risk Manager who will ensure that it is reported to the appropriate regulatory agency depending on the state where the spill occurs (Kansas Department of Health and Environment; Oklahoma Department of Environmental Quality; Missouri Department of Natural Resources; or Environmental Protection Agency for spills on trust land).**
- ☐ If the spill is defined as “small”, a properly trained employee should clean up the spill utilizing the instructions on the appropriate MSDS and one of the nearby spill kits. Immediately report the details of the spill to the Risk Manager.
- ☐ If the spill is “major”, clear the area and immediately notify the on-site Quapaw Tribe Fire Department who will determine whether to shelter in place or evacuate. (The nature of the chemical/petroleum product and nearness of the accident will probably be the deciding factor-only major spills of hazardous substances would warrant evacuation or shelter in place procedures.). If the on-site Quapaw Tribe Fire Department personnel are not available, immediately notify the General Manager or Assistant General Manager and the on-site Risk/Safety Manager.
- ☐ Any chemical cloud that can affect employees in their work areas would very likely affect the casino/hotel patrons. If time is of prime importance, it may be necessary to evacuate to an area outside of the building by foot. If this occurs, move crosswind to avoid fumes or vapors, never upwind or downwind. See “Emergency Operating Procedures” (under separate cover) for evacuation procedures.
- ☐ For major spills that are an immediate threat to human health and safety, notify the Fire Department **911**. Give location and chemical/petroleum product information, if known, and have someone stay on line to give additional information while emergency units are in route.
- ☐ The on-site Risk Manager shall notify the BIA and the Quapaw Tribe Environmental Office so that the BIA HAZMAT team can be notified to respond.

NOTE: Do not attempt to clean up a hazardous chemical spill. The contacted BIA HAZMAT Team will accomplish the clean up.

EMERGENCY OPERATING PROCEDURES

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- ☐ Evacuation of the building may be ordered or the on-site Risk Manager, the Police Department, or the Fire Department may advise you to "shelter in place". See the description on the following page for "shelter in place" procedures.
- ☐ If the decision is made to evacuate the building:

- ☐ **PRIMARY: VALET PARKING LOT**

- ☐ **SECONDARY: NORTH EDGE OF MAIN PARKING LOT**

NOTE: During periods of inclement weather, when evacuations are expected to last for some time, a decision will be made by the on-site Risk Manager to move to an alternate location.

- ☐ Supervisors or managers will report the names of missing employees to the on-site Risk Manager. Those not found will be reported to the Fire Department or Law Enforcement Officials as they arrive.
- ☐ Ask for advice on evacuation or sheltering in place. If advised by the on-site Risk Manager, Fire or Police Department "shelter in place."
- ☐ Log activities and decisions on a Chemical/Fuel Spill Report Form (appendix 1-2)
- ☐ Estimate extent of injuries or potential physical danger with EMS personnel.
- ☐ The on-site Risk Manager will keep a list of hospitalized persons and where employees were evacuated.
- ☐ Upon request by the Downstream Casino Resort management, the on-site Risk Manager will assist Downstream Casino Resort media personnel in preparing any fact sheets and/or media statement.
- ☐ Employees will not be allowed to re-enter the building until the Fire Department or Law Enforcement Officials have declared the area safe.

DO NOT:

- Leave the spill area unattended unless the chemicals spilled do not present a clear and immediate health hazard to anyone exposed. Isolate the spill area and do not allow anyone to enter the area.
- Try to clean up a major spill.
- Handle hazardous material in any way.

In Place Sheltering Procedure

- a. The Floor Monitors telling employees that the "In-place-shelter procedure" is in effect shall make an announcement.

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- b. Floor Monitors will close all doors to the outside and close and lock all windows. (Windows seal better when locked.) Seal gaps under doorways and windows with wet towels, and those around doorways and windows with duct tape.
- c. The on-duty Facility Manager (or his/her designee) will set all ventilation systems to 100 percent recirculation so that no outside air is drawn into the structure. Where this is not possible, ventilation systems should be turned off.
- d. The on-duty Facility Manager (or his/her designee) will also, turn off all heating systems and air-conditioners.
- e. The on-duty Facility Manager (or his/her designee) will also seal any gaps around window-type air-conditioners, exhaust fan grills, exhaust fans, range vents, dryer vents, etc. with duct tape and plastic bags, used as sheeting, and wax paper or aluminum wrap if available. Close as many internal doors as possible.
- f. The on-site Risk Manager will post warning signs at entrance.

FIRE/EXPLOSIONS

- 1. IN CASE OF ANY FIRE OR EXPLOSION, EVACUATE TO A SAFE AREA (see section IV). Immediately report all fires by dialing 911 after evacuating to an area where such communication is safe to perform. Then proceed to a pre-designated emergency meeting area.
- 2. Give your name, location, telephone number and a brief explanation of the problem.
- 3. IF THE FIRE CAN BE SAFELY FOUGHT WITH A PORTABLE EXTINGUISHER, DO SO. IF IN DOUBT, LEAVE THE AREA IMMEDIATELY.
- 4. The Fire Captain at the scene becomes the incident commander and has total control of the situation whenever a fire or explosion occurs, or at other times when Fire Department assistance may be required.
- 5. After the situation is contained, the area must be carefully checked for other hazards, cleaned and decontaminated. All hazards relating to the incident will be removed before personnel are allowed to reenter the area. Do not reenter the area until instructed it is safe to do so by either the on-scene incident commander or the emergency coordinator.



EMERGENCY OPERATING PROCEDURES

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6. Report the incident as described in Section VI below.

Note: See CHAPTER 6 (FIRE EMERGENCY) of the “Emergency Operating Procedures” for a detailed description of appropriate response procedures for fires.

REPORTING REQUIREMENTS

All responses to incidents will be recorded in a Chemical/Fuel Spill Report form (a blank form is enclosed in appendix 1-2). This report will contain a critique of the response to the incident and possible methods of preventing the incident in the future. If the spill is “major” (above a CERCLA or EPCRA “reportable quantity” or in excess of 25 gallons if a fuel spill), report the spill according to the following:

SPILL REPORTING PROCEDURES

In the event of a major spill of a hazardous substance or petroleum product, personnel should call 911, the Risk Manager, and the Quapaw Tribe Environmental Office immediately. The Risk Manager should follow the spill response procedures described in part V. Subsequently, reporting the spill or release should follow the following procedures:

Chemical Spills: Any spill of a reportable quantity of an “EPCRA Extremely Hazardous Substance” or “CERCLA Hazardous Substance” should be reported to the National Response Center at 800-424-8802, or online at the National Response Center website:
<http://www.nrc.uscg.mil/apex/f?p=201:1:4198710162902081>

If the spill occurs on non-Trust land, Notify Kansas Department of Health and Environment (KDHE) if the spill occurs in Kansas; notify Oklahoma Department of Environmental Quality (ODEQ) if the spill occurs in Oklahoma on non-Trust land; and notify Missouri Department of Natural Resources (MDNR) if the spill occurs in Missouri. Reporting procedures for Kansas, Missouri, and Oklahoma are enclosed in appendix 1-3. Contact information for the above listed agencies is also located in Section I. In all cases, also notify the Quapaw Tribe Environmental Office. Required written reporting should conform to each State agency’s specific requirements and requests; however, at a minimum, the report should include:

- a. Name, address, and phone number of the owner or operator and of the facility;



EMERGENCY OPERATING PROCEDURES

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- b. Date, time, and type of incident;
- c. Name, and quantity of material(s) involved;
- d. The extent of injuries, if any;
- e. An assessment of actual or potential hazards to human health or the environment, where applicable;
- f. Estimated quantity and disposition of recovered material that resulted from the incident;
- g. Steps taken to prevent a recurrence of the incident; and
- h. Any changes required in the contingency plan.

Petroleum Product spills: Any reportable quantities (25 gallons or more) of Petroleum product releases should be reported according to the procedures established by the appropriate agency. If the spill occurs on Trust land, report the spill online at the National Response Center website:

<http://www.nrc.uscg.mil/apex/f?p=201:1:4198710162902081>

Reporting procedures for Missouri, Oklahoma and Kansas are enclosed in appendix 1-3. Contact information for the above listed agencies is also located in Section I. Notify Kansas Department of Health and Environment (KDHE) if the spill occurs in Kansas; notify Oklahoma Department of Environmental Quality (ODEQ) if the spill occurs in Oklahoma on non-Trust land; and notify Missouri Department of Natural Resources (MDNR) if the spill occurs in Missouri. In all cases, also notify the Quapaw Tribe Environmental Office. Information in the report should, at a minimum, include the information listed above for chemical spills.

TRAINING

All Team Members shall be trained to respond to chemical/petroleum product spills. This training shall be incorporated into the required quarterly safety training sessions. Training shall be conducted by the Risk Manager and/or the Quapaw Tribe Environmental Director. Training shall include, but not be limited to:



EMERGENCY OPERATING PROCEDURES

Revised 4/15/2013

- a. Types and quantities of chemical/petroleum products utilized at the facility;
- b. Location and proper storage of chemical/petroleum products utilized at the facility;
- c. Determination of whether a spill is “major” or “minor” and the proper response to each;
- d. Potential health hazards associated with chemical/petroleum product spills;
- e. Location and use of spill kits;
- f. Proper isolation of spill areas;
- g. Hands-on emergency response drills;
- h. Reporting procedures and reporting hierarchy;
- i. Proper storage and disposal of waste material;
- j. All Emergency notification procedures including the use of appropriate emergency telephone numbers; and
- k. Appropriate evacuation procedures

PLAN REVIEW

With input from Downstream Casino Resort personnel and the Downstream Casino Resort General Manager or Assistant General Manager, QTEO will review this plan annually and update as necessary.

Original Preparation Date: January 15, 2009



Quapaw Tribal Gaming Agency

2/8/13 MK

Date Received	2/15/13 MK
Comments	
Reviewed By	JB 2.25.13 MK 2/25/13 JB 3/8/13 MK 3/8/13
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: <i>Construction Site Procurement Policy for Goods and Services Included in the GMP</i> <i>Policy #6030.11.01</i>	Department: Purchasing	Submission Date: 2/12/2013
Narrative Description: To establish a standard operating policy and procedures for the procurement of goods and services contemplated and otherwise covered by the Guaranteed Maximum Price contract for Downstream Casino Resort construction.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED APR 24 2013

DCR Compliance Authorization

Signature: Stephani Hardy 2551

Date: 2/6/13

Department Director Authorization

Signature: Jeri Montgomery

Date: 2/12/13

General Manager/Assistant General Manager Authorization

Signature: Jeni Camacho

Date: 2/15/13

QTGA Authorization

Signature: Barbara Bellini

Date: 3/13/13

Construction Site Procurement Policy for Goods and Services Included in the GMP	Policy No: 6030.11.01	Issue Date: 3/13/2013
PURPOSE: To establish a standard operating policy and procedures for the procurement of goods and services contemplated and otherwise covered by the Guaranteed Maximum Price contract for Downstream Casino Resort construction.		

DCR Compliance – ITEM Tracking	Date
Issue Date	3/13/2013
Compliance Review	3/7/2012
QTGA Submission	5/4/2012
QTGA Return	6/13/2012
Compliance Review	6/15/2012
QTGA Submission	6/18/2012
QTGA Return	9/5/2012
Compliance Review	9/11/2012
QTGA Submission	9/13/2012
QTGA Return	1/17/2013
QTGA Submission	2/12/2013
GM Approval	2/15/2013
QTGA Approval	3/13/2013
DDA Final Approval	4/24/2013

POLICY

The procurement of goods and services for Downstream Casino Resort (DCR) construction is solely the responsibility of the Downstream Development Authority (DDA). The DDA is a tribally chartered, wholly owned entity of the Quapaw Tribe of Oklahoma (Tribe). The Business Committee of the Quapaw Tribe of Oklahoma created the DDA to construct and operate a gaming facility for the economic benefit of the Tribe.

The DDA has entered into a Guaranteed Maximum Price (GMP) contract with the specified licensed Contractor. This policy applies to goods and services contemplated or otherwise covered by the terms of the GMP.

If payments to vendors will exceed \$25,000, then the vendor must go through the licensing procedures with the Quapaw Tribal Gaming Agency (QTGA). The vendor does not have to be licensed if payments made by DCR do not exceed the \$25,000 threshold, however they must still be registered with the QTGA.

PROCEDURES

The following procedures shall be followed to acquire and pay for goods and services contemplated and otherwise covered by the GMP contract for DCR construction:

1. Contractor will negotiate with vendors for materials necessary to complete construction.
2. After negotiating for the appropriate materials, the Contractor will submit a detailed Purchase Requisition to the Owner's Representative of the contracting company.
3. Owner's Representative will approve the Purchase Requisition and forward to the Director of Facilities for final approval. See Purchasing Policy, #6030.10 for an example of the Purchase Requisition.
4. The Director of Facilities will approve the Purchase Requisition and transmit the approved document to Procurement Agents.
5. Upon receipt of an approved Purchase Requisition, a Procurement Agent will generate and transmit a Purchase Order to the appropriate licensed vendor that is to provide the goods and services requested, with copies sent to the Accounts Payable Department and Contractor.
6. The Procurement Agent will provide each vendor with a copy of the Exemption letter from the State of Oklahoma Tax Commission to ensure that sales tax is not paid on purchases relating to the construction.
7. Purchase commitments made without a valid Purchase Order will not be honored.
8. All goods and services must be delivered to the following address:

Downstream Casino Resort
69300 E. Nee Road
Quapaw, OK 74363
9. All invoices must be billed to the following address, along with copy to the Contractor or the appropriate Sub-Contractor:

Downstream Casino Resort
Attn: Accounts Payable Department
69300 E. Nee Road
Quapaw, OK 74363
10. Upon completion of work, the Contractor shall submit to the Owner's Representative and the project architect a request for payment.

11. The application for payment must detail the work performed by the Contractor and/or its Sub-Contractors. Each application must be supported by the detailed invoices for goods and services provided.
12. Deficiencies identified by the Owner's Representative or the Architect must be resolved before the application is approved for payment.
13. When the Owner's Representative and the Architect have independently approved the application for payment, the Director of Facilities will then review each application for payment.
14. After the Director of Facilities approves an application for payment, the approved application will be forwarded to the Accounts Payable Department of DCR for payment.

Quapaw Tribal Gaming Agency



Date Received	2/13/13 BM
Comments	
Reviewed By	BM 2/25/13 MK 2/25/13 JB 2/25/13
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Promotion Submission Procedures Policy #6230.04.02	Department: Marketing	Submission Date: 2/5/2013
Narrative Description: To establish a policy and procedures for promotion submissions. This is a revision to #6230.04.01 to include the new Minimum Internal Control Standards for promotions and to allow the Assistant General Manager to be an authorized signature on the submission page.		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED APR 24 2013

DCR Compliance Authorization

Signature: Stephanie Hardy 2551

Date: 1/30/13

Department Director Authorization

Signature: [Signature]

Date: 1-31-13

Assistant General Manager Authorization

Signature: [Signature]

Date: 2-12-13

QTGA Authorization

Signature: Barbara Collins

Date: 2/25/13

PROMOTION SUBMISSIONS PROCEDURES	Policy No: 6230.04.02	Issue Date: 2/25/2013
PURPOSE: To establish policy and procedures for promotion submissions.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/28/2010
Compliance Review	01/26/2010
QTGA Submission	01/28/2010
QTGA Return	02/09/2010
Compliance Review	6/28/2010
QTGA Submission	7/1/2010
QTGA Final Approval	7/28/2010
GM Approval	6/30/2010
DDA Final Approval	8/12/2010
Compliance Revisions to #6230.04.01	1/24/2013
QTGA Submission	1/24/2013
QTGA Return	1/29/2013
QTGA Submission	2/5/2013
QTGA Approval	2/25/2013
DDA Approval	4/24/2013

POLICY

All promotional activities must be documented, reviewed, and submitted to the Downstream Casino Resort (DCR) Compliance Department and then approved by the Quapaw Tribal Gaming Agency (QTGA).

The rules of the gaming promotions must be displayed or made readily available to the patron up request.

PROCEDURES

Promotion Documentation

All promotions must be documented in such a way to allow for methodology, structure, process and performance to be easily auditable. To achieve this, all submissions must include at minimum the following:

1. Date, dates, or covered period of the promotion.
2. Detailed evaluation of promotion target audience if applicable.

3. Detailed explanation of promotional event structure.
4. Detailed explanation of promotional prize structure.
5. Value of prizes, individually and total estimated.
6. Retail or fair market value of prize.
7. Rules, terms, conditions, and dispute or prize claim process.
8. Reference of approved issuance, redemption, or process procedures that covers the event.
9. Detailed evaluation of control issuance forms, digital coupon configuration or other applicable guidance to conduct the promotion.
10. Promotional pre-forma with expected performance, capture rates, or expected reinvestment or other measurable expected results, if applicable.
11. Any system of controls or evidence which may be needed to adequately evaluate the compliance, impact, or performance of a promotional activity.
12. Any other items as requested by QTGA.

Submission Requirements

1. All promotions must be submitted by the Marketing Department to the DCR Compliance Department at least 30 days before the start date of the promotional event.
2. DCR Compliance Department must submit all promotions to QTGA at least 21 days before the start of the promotional event.
3. All promotion submission forms (pg. 5) must include at least the following:
 - a. The rules of play.
 - b. The nature and value of the associated prize(s) or cash award(s).
 - c. Any restrictions or limitations on participant eligibility.
 - d. The date(s), time(s), and location(s) for the associated promotional activity or activities.

- e. Any other restrictions or limitations, including any related to the claim of prizes or cash awards.
 - f. The announcement date(s), time(s), and location(s) for the winning entry or entries.
 - g. Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties.
 - h. Final drafts of any controlled marketing materials.
4. All promotion submissions must include at least the following signatures prior to submission to the QTGA:
- a. Marketing Department Director or above
 - b. Marketing Manager
 - c. Quapaw Casino if applicable
 - d. Associated Department if applicable
 - e. DCR Compliance Department, prior to General Manager submission
 - f. General Manager or Assistant General Manager, prior to DDA submission
 - g. DDA signature prior to submission to QTGA
 - h. QTGA Director or designee, attesting to approval.
5. All submissions must be presented by the DCR Compliance Department to QTGA.

Approval

1. Once approved in writing by the QTGA Director or Designee, a scanned copy of the submission will be issued to related parties in PDF format via electronic communication to the following:
- a. QTGA Director and Deputy Director
 - b. QTGA Compliance Supervisor
 - c. QTGA Auditor

- d. DCR Director of Marketing
 - e. DCR Marketing Manager
 - f. DCR Department Directors and/or Managers as applicable
2. All submission documentation will be maintained in the DCR Compliance files, with original signatures.

Review and Compliance

1. All submissions will be audited by Income Audit, in accordance with Quapaw Tribal Internal Control Standards, National Indian Gaming Commission standards, Minimum Internal Control Standards as defined in the Code of Federal Regulations, and procedural requirements.
2. Any exceptions will be reported to the DCR Compliance Department and Marketing Department via exception notification. A summary of exception notifications will be provided to the QTGA upon request.
3. Any notifications of control violation will be submitted to the QTGA immediately, action may be subject to review.
4. Nothing in the policy prevents DCR Management, the Downstream Development Authority, QTGA, or any other approved body from taking any further action, which may be deemed necessary. Further action shall be a written warning at a minimum up to and including termination, determined on a case by case basis by the General Manager or Assistant General Manager.



TGA Office Use Only	
Date Received:	_____
Action:	_____
Reviewed By:	_____
<input type="checkbox"/> Approved	<input type="checkbox"/> Not Approved

Quapaw Tribal Gaming Agency Promotional Activity Review Form

Type/Name of Promotion:	Sponsoring Department:	Submission Date:
One-time Event On-going Event	Contact: Extension:	Date/Time/ Place
Narrative Description: (Attach Rules to this Form) 		Prize(s): Monetary Award(s) Non-Monetary Award(s):
Eligibility Criteria:		
Associated Advertising: Direct Mail <input type="checkbox"/> Print <input type="checkbox"/> Radio <input type="checkbox"/> Television <input type="checkbox"/> Other <input type="checkbox"/>		
Procedures for Redeeming Prizes:		

Marketing Manager: _____ Date: _____

Marketing Director: _____ Date: _____

Compliance Officer: _____ Date: _____

Associated Department: _____ Date: _____

Asst./General Manager: _____ Date: _____

DDA: _____ Date: _____

***TO COMPLIANCE: - *TO DDA: - *BACK TO COMPLIANCE:**

***PAPERWORK TO MARKETING: - *DUE TO QTGA BY:**

QTGA Authorization: _____ Date: _____

***DUE TO MARKETING WITH APPROVALS:**

06/28/12 - KB

Quapaw Tribal Gaming Agency



Date Received	2/13/13 BM
Comments	
Reviewed By	BM 2/13/13 MK 2/25/13 JB 2-25-13
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number: Use of Force Policy #7400.11.02	Department: Security	Submission Date: 1/31/2013
Narrative Description: To establish guidelines governing the use of force and its limitations and to describe prohibited activities. This is a revised version to include a section on the use of "Pepper spray".		DCR/QTGA Tracking: POLICIES & PROCEDURES DDA APPROVED APR 24 2013

DCR Compliance Authorization

Signature: Stephani Hardy 2551

Date: 1/25/13

Department Director Authorization

Signature: [Signature] 602

Date: 1/25/13

Ant General Manager Authorization

Signature: [Signature] 2298

Date: 2/12/13

QTGA Authorization

Signature: Barbara Cellini

Date: 2/25/13

Use of Force	Policy No: 7400.11.02	Issue Date: 2/25/2013
PURPOSE: To establish guidelines governing the use of force and its limitations and to describe prohibited activities.		

DCR Compliance – ITEM Tracking	Date
Issue Date	2/25/2013
Compliance Review	5/9/2011
QTGA Submission	5/11/2011
Compliance Review	7/27/2011
QTGA Submission	7/29/2011
QTGA Final Approval	8/11/2011
GM Approval	7/28/2011
DDA Final Approval	8/31/2011
Compliance Revisions to #7400.11.01	6/21/2012
QTGA Submission	7/9/2012
QTGA Return	9/5/2012
Compliance Review	9/11/2012
QTGA Submission	9/12/2012
QTGA Return	11/20/2012
Compliance Revision	12/21/2012
QTGA Submission	1/31/2013
GM Approval	2/12/2013
QTGA Approval	2/25/2013
DDA Approval	4/24/2013

POLICY

1. Security Officers regularly confront situations requiring the use of force to ensure public safety. The appropriate degree of force used depends on what the Security Officer perceives as reasonable and necessary under the circumstances at the time he or she decides to use force. Except for deadly force, the application of any degree of force is justified only when the Security Officer reasonably believes that it is necessary in order to:

- a. Make an investigative detention of a person the Security Officer believes has committed a crime against patrons or Team Members of Downstream Casino Resort (DCR), or property owned or operated by DCR or the Quapaw Tribe; or
 - b. Defend him or her or another against acts of violence of any degree.
2. Only facts the Security Officer knew or reasonably should have known shall be considered in investigations or determinations of whether the use of force was justified.
3. The Security Department expects Security Officers to observe the following guidelines in all applications of force:
 - a. The objective of any use of force is to overcome the suspect's resistance.
 - b. Security Officers shall employ only the amount of force that is objectively reasonable under the circumstances.
 - c. When applying deadly force, the Security Officer's objective shall be to stop or incapacitate the suspect's threat.
 - d. Security Officers shall not unreasonably or unnecessarily endanger themselves or the public when implementing this policy.
4. The DCR Security Department subscribes to the view that the TASER is generally not to be used as a pain-compliance device. However, if doing so can avoid more injurious methods (i.e.: striking the subject or using takedowns), it may be preferable.
 - a. For example; the Security Officer is escorting a handcuffed subject into a detention area and such persons are presenting Active Resistance such as clinging to objects in an attempt to prevent the Security Officer from gaining control or exerting influence by physical effort or action; (i.e. using muscle tension to prevent movement) lesser methods of control have proven ineffective and higher methods are likely to cause injury. It is preferable to use the TASER in the form of pain-compliance in order to avoid more injurious methods such as striking the subject or using takedowns.

5. Security Officers should adhere to the following six steps, when practical, before deploying a Taser;
 - a. The Security Officer should give a verbal warning of a TASER exposure in an attempt to gain compliance.
 - b. A shortened exposure, equivalent to about a one (1) second, should be used.
 - c. If the one (1) second exposure does not achieve compliance, the Security Officer should repeat the verbal warning of a TASER exposure in an attempt to gain compliance.
 - d. A full five (5) second cycle should be applied in an attempt to gain the person's compliance.
 - e. If the cycle has no effect on the subject's behavior, the Security Officer should consider whether the TASER is functioning properly, whether the subject is exhibiting behaviors associated with "excited delirium," and whether other use-of-force options may be appropriate. During a 5-second cycle the Security Officer should re-evaluate the situation, give verbal commands and determine if it is reasonable to perform an additional or continued cycle.
 - f. All steps should be properly documented in the incident report. (If a step was skipped explain why it needed to be skipped in the incident report.)
6. Exhausted/Distressed Individuals Agitated/Excited Delirium
 - a. Security Officers should be able recognize when individuals are under the influence of drugs or exhibiting behaviors consistent with "excited delirium". These persons may be physiologically compromised and are at a heightened risk of injury or death. If a subject appears to be under the influence of drugs or suffering from excited delirium, Security Officers should avoid using a Taser to subdue the subject unless there is no other reasonable method available.

- i. Signs of excited delirium include: Aggressiveness, hyperactivity, extreme paranoia, incoherent shouting, unexpected strength, panic, failure to acknowledge pain, and hyperthermia (often marked by the subject's attempts to remove his or her clothing in order to cool down).
 - ii. Individuals exhibiting symptoms of excited delirium should be treated by medical personnel as immediately as possible to reduce the risk of death.
 - b. When practical, avoid direct confrontation until backup and Emergency Medical Services (EMS) has arrived.
 - c. When practical the Security Officer should attempt to de-escalate.
 - d. Security Officers should recognize that continued and, prolonged resistive struggle is more dangerous than TASER deployment.
 - e. When possible, Security Officers should have back up present and develop a plan to capture and restrain the subject in order to minimize the duration of the struggle and any adverse physiological effects.
 - f. If time allows EMS personnel should also be dispatched to stage nearby when TASER deployment is anticipated.
7. Due to the importance of this policy, each Security Officer will be issued a copy and receive annual instructional training concerning its contents. All future Team Members of this Department will also be issued a copy of this policy and receive identical instruction on its contents before being allowed to carry a firearm. Policy familiarization will be conducted annually and the policy will be reviewed and updated as necessary.

PURPOSE

To establish guidelines governing the use of force and its limitations, as well as describe prohibited activities.

DEFINITIONS

1. Deadly force- Any force applied in any manner by any means that could reasonably be expected to cause death or serious physical injury.
2. Non-deadly force- Force employed which is neither likely nor intended to cause death or serious physical injury.
3. Firearms- Any weapon from which a projectile is forcibly ejected by an explosive.
4. Reasonable belief- When facts or circumstances the officer knows, or should know, are such as to cause an ordinary and prudent person to act or think reasonably in a similar way under similar circumstances.
5. Serious physical injury- Bodily injury which creates a substantial risk of death or which is likely to cause serious permanent disfigurement or loss, or extended impairment of the function of any body member or organ.
6. Objectively Reasonable Force- The "reasonableness" of a particular use of force must be judged from the perspective of a reasonable officer on the scene, rather than with the 20/20 vision of hindsight. The calculus of reasonableness must embody allowance for the fact that security officers are often forced to make split-second judgments - in circumstances that are tense, uncertain, and rapidly evolving - about the amount of force that is necessary in a particular situation. The question is whether the officers' actions are "objectively reasonable" in light of the facts and circumstances confronting them, without regard to their underlying intent or motivation. Because "the test of reasonableness under the Fourth Amendment is not capable of precise definition or mechanical application," however, its proper application requires careful attention to the facts and circumstances of each particular case, including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others.

PROCEDURES - Non-deadly force

1. Most resistance is non-compliance, psychological intimidation, passive, active or escape resistance. Officers are taught a preemptive response to threat indicators that

correlate with lower levels of force applications. In addition to lower level force applications, a preemptive response to threat indicators reduces the likelihood of active aggression and deadly force threat events. Following the application of any method of force, once the situation is contained, medical attention shall be provided or obtained for any individual requesting medical attention, or if deemed necessary by the Security Officer or Security Supervisor on scene.

2. Reasonableness Factors

- a. In evaluating the reasonable application of force, among other factors Security Officers may consider;
 - i. Their own age, size, strength, state of health
 - ii. Security Officer vs. subject fitness level
 - iii. Security Officer's skill level
 - iv. Knowledge of subject's skill level
 - v. Number of subjects / Security Officers
 - vi. Ability to disengage
 - vii. Control attempt vs. self defense
 - viii. Environment
 - ix. Availability of Time, Distance, and Cover

3. Levels of Resistance

- a. Psychological Intimidation – Verbal and Non-Verbal cues indicative of a subject's mental or physical preparedness to resist and/or assault the Security Officer or others.
- b. Non-Compliance - Non compliance or verbal responses or threats of non-compliance to Security Officer's directions.
- c. Passive Resistance - Dead weight; no active participation, not influencing, not exerting any force (internal or otherwise).

- d. Active Resistance - Clinging to objects in an attempt to prevent the Security Officer from gaining control, exerting influence by physical effort or action. (i.e. using muscle tension to prevent movement.)
- e. Escape Resistance - Fleeing, pushing or pulling away from the Security Officer to avoid control, however, not attempting to harm the Security Officer.
- f. Active Aggression - Physical assault.
- g. Deadly Force Threat – Assaults with the perceived intent and apparent ability to cause death or great bodily harm.

4. Levels of Response

a. Presence/Appearance

- i. The Security Officer is recognizable either by sight or by identifying himself or herself. The Security Officer's presence, demeanor, and attitude serve as the first level of response to a situation.

b. Tactical Communication

- i. Skillful communication tactics are calculated toward gaining a desired end or temporary advantage. Communication refers to the manner in which the Security Officer speaks to a person. Verbal control includes advice, persuasion, admonitions, or orders. Effective use of non-verbal communication includes volume, tone and body language such as gestures and body positioning. Tactical awareness and use of this skill set may facilitate control without having to resort to another method of force. Security Officers shall use verbal commands without the use of profanity or disrespectful or argumentative language or behavior.

c. Soft Control Techniques (Empty Hand)

- i. When the subject fails to respond to verbal direction or resists in a defensive manner, the Security Officer may seek compliance by the use of physical means. This could include empty hand control, pressure compliance holds, blocking, restraining, controlling or escorting holds. The object of this level of force is to gain control and enforce the suspect's compliance while

minimizing the risk of injury to officers, bystanders, or the person being detained.

- d. Control and Compliance Tools- This level directs the use of more aggressive techniques against the subject's resistance. The subject has become an aggressor, attacks the Security Officer, or there is fear for the safety of the Security Officer and others or lower level techniques have been exhausted or would be ineffective. The use of a TASER is appropriate at this level. Officers shall be trained in these techniques by a certified instructor.

- i. Taser

1. The TASER may be used when a subject has become an aggressor, attacks the Security Officer, or there is fear for the safety of the Security Officer and others or lower level techniques have been exhausted or would be ineffective or there is reasonable expectation that it will be unsafe for Security Officers to approach within contact range of the subject.
2. Deployment is inappropriate when officers encounter passive resistance. Deployment is also inappropriate for "passive subjects" to include those persons who question a Security Officer's commands in a non-violent and non-threatening manner.
3. While a subject's flight may be considered "escape resistance" flight alone should not be the sole justification for deploying the TASER. Prior to deploying the TASER against a fleeing subject, the Security Officer should consider such factors as:
 - a. The severity of the offense
 - b. Any immediate threat to the safety of the Security Officer or others posed by the subject
 - c. The ability of the officer to safely affect the detention without TASER deployment

- d. The risk of secondary injury to the subject, who could fall from a running position
4. All uses should conform to the constitutional standards regarding the use of force under the Fourth Amendment.
 5. The TASER shall be issued to and used only by Security Officers who have completed User or Instructor TASER training program.
 6. Only properly functioning and charged TASER units shall be carried on duty.
 7. Each discharge, including accidental discharges, of a TASER shall be investigated and documented. A Report shall be completed after each use of the TASER. Discharges of the TASER during an approved training session, and at the beginning and end of shift testing, will not require routine completion of these forms. In the event of an accidental or negligent discharge further investigation shall be performed.
 8. The TASER is programmed to deliver a 5-second “electrical current.” The officer using the weapon can shorten the automatic 5-second cycle by turning the weapon off. It is recommended that during field deployment and use of the weapon, the full 5-second cycle be delivered to gain maximum effectiveness and control of the subject. If a cycle has no effect on the subject’s behavior, the Security Officer should consider whether the TASER is functioning properly, whether the subject is exhibiting behaviors associated with “excited delirium,” and whether other use-of-force options may be appropriate. During a 5-second cycle the officer should re-evaluate the situation, give verbal commands and determine if it is reasonable to perform an additional or continued cycle.
 9. The TASER is designed to be used in two modes, probe deployment or drive stun. Probe deployment mode is recommended because of its ability to disrupt neuro-motor control of the subject, while in drive stun mode it is merely a pain compliance tool.

10. Aiming the TASER at the eyes or face is prohibited unless lesser force options are ineffective or likely to be ineffective and deadly force is justified.
11. Those handling the TASER should keep hands away from the front of the weapon at all times unless the safety is activated and the TASER cartridge is removed.
12. DO NOT fire the TASER near flammable liquids or fumes. The TASER can ignite gasoline and other flammables. DO NOT deploy the TASER in highly flammable Methamphetamine labs if encountered on DCR property or in the resort hotel.
13. Replace the cartridge by the expiration date. All expired cartridges will be turned into the Director of Security and replaced with new cartridges. Expired cartridges will be turned over to the designated department TASER instructors for use during training exercises or for disposal.
14. The TASER is not to be discharged if the Security Officer has knowledge that any member of a police department, agency, or a civilian has sprayed the subject with OC Spray or any type of other chemical agent because of the potential for combustion.
15. Security Officer responsibilities (those not issued a TASER)
 - a. Upon encountering a situation, which may require the use of the TASER, request a Security Supervisor and a Security Officer equipped with a TASER. NOTE: The broadcast of a request for a TASER will be interpreted by dispatch personnel as the request for a TASER equipped officer and supervisor to respond immediately to the requesting officer's location. The requesting officer may specify a lesser response. If the situation changes and the TASER is no longer needed, a cancellation of the request shall be broadcast.
 - b. When practical, do not escalate the situation before arrival of a supervisor and TASER officer.

16. TASER equipped officers

- a. Carry the TASER on duty unless specifically exempted by higher authority.
- b. The TASER shall be carried in the issued thigh holster or other approved holster.
- c. When not in use the TASER shall be secured properly in a carrying case and treated as a weapon.
- d. Security Officers shall ensure the batteries of the TASER are properly charged. The TASER must be tested at the beginning and end of each shift, without a cartridge or as required.
- e. After discharging a TASER, the Security Officer shall request a Security Supervisor to the scene if one is not already present. Although it is preferred to wait for a Security Supervisor's arrival prior to use of the TASER, deployment and use is at the discretion of the trained officer.
- f. The air cartridge and probes shall be retained and submitted as evidence in any case where the person(s) affected by the TASER require transportation to the hospital or in the event that someone other than the desired person is shot. The Security Officer should wear protective latex gloves when handling the cartridges/probes due to the potential biohazard. The wires shall be wound around the cartridge and the probes inverted into the portals they were deployed from. This will prevent the sharp ends from penetrating the evidence envelope. Tape should be placed over the portals to secure the probes in the cartridge. The cartridge shall then be placed in an evidence bag and appropriately packaged as a biohazard.

- g. Cartridges from uses of the TASER, which do not meet the criteria above, will be turned over to EMS personnel for biohazard disposal or disposed of in a hazardous waste container.
- h. Ensure that the serial number of each cartridge fired is listed in the, deployment report.
- i. The TASER is a sensitive electronic product and costly device, which should be encased in its protective holster or case when not in use. Care should be taken to avoid dropping.
- j. Defective air cartridges and TASERs shall be returned to the Director of Security for replacement.

17. Manager/Supervisors Responsibilities

- a. When practical, respond to scenes where the TASER has been or is expected to be deployed.
- b. Ensure that Security Officers who discharge the TASER complete a report.
- c. Ensure the reports are forwarded through the chain of command to the Director of Security or designee.
- d. Investigate each incident where the TASER is used on a subject (with actual firing of probes or touch stunning).
- e. Review the Security Officer's report.
- f. Ensure the subject that the TASER was deployed on, is examined by trained personnel.
- g. Ensure photographs are taken of the probe penetration sites and any secondary injuries caused by falling to the ground, etc. Photographs can be taken with any department

camera, Surveillance, or described in a report as necessary.

- h. Each Security Supervisor shall ensure Security Officers assigned a TASER shall be supplied with or have access to gloves and alcohol swabs. These supplies shall be provided to the officer on the scene responsible for securing any TASER associated evidence (if applicable) and for removing the probes from the subject.
- i. Ensure that incidents involving any discharge of the TASER is investigated and appropriately documented.
- j. Ensure only trained Security Officers are issued and using the TASER.
- k. Ensure that the TASERS are signed out and properly tested at the beginning and end of each shift and that all TASERS and air cartridges are accounted for and properly secured at the end of the shift.
- l. Supervisors that issue officers TASERS shall undertake TASER training.

18. Treatment of Persons Subjected to TASER exposure

- a. After securing the subject in handcuffs and/or other appropriate restraints, the TASER trained officer shall remove the probes using prescribed methods. However, if the probes imbed in soft tissue areas such as neck, face, groin, eyes or the female breast the Security Officer shall require the subject to be treated only by medical personnel. Removal from other non-target areas will be at the discretion of the on-scene supervisor.
- b. Removal of Probes: (The cartridge shall be removed from the TASER prior to removal of probes.)

- i. Security Officer shall don medical latex gloves.
 - ii. The Security Officer shall place one finger on either side of the probe and stretch the skin taut.
 - iii. Using a brisk pull, the Security Officer shall pull the probe out of the subject.
 - iv. The puncture site shall be wiped with a sterile alcohol swab and an adhesive bandage applied to the site.
 - v. Alcohol swabs, gloves and bandage packaging shall be disposed of in a biohazard bag or receptacle.
- c. If the subject is transported to the emergency room the Security Officer shall advise the paramedic that the person has been subjected to the TASER and relate the time of the incident. Only emergency room staff may remove probes that embed in soft tissue areas such as the neck, face, groin, eyes or the female breast.
- d. After examining the affected person, the paramedics will make the determination if the person should be transported to the hospital for additional treatment.
- e. Security Officers must be aware the one easily overlooked aspect of injury in shooting a subject with the TASER is that of falling from a standing position. If the subject complains of injury or if the Security Officer reasonably believes that injuries are likely, EMS should perform a thorough physical examination with particular emphasis on secondary injuries.
- f. Security Officers should avoid restraint techniques that could impair the subject's respiration. Neck restraints and excessive pressure on a subject's torso should be avoided if a TASER has been deployed on them.

- g. If the subject's actions require being taken to jail, the jail staff should also be notified that a TASER has been used on the subject so that they can continue to monitor and evaluate the subject for the possible need of further medical attention.

19. Tactical Deployment

- a. When practical, alert surrounding Security Officers of the impending TASER deployment.
- b. When practical, prior to deployment, verbal warnings are encouraged as they may achieve suspect compliance, eliminating the need to deploy the TASER. Security Officers should recognize giving a verbal warning may reduce the opportunity for successful target acquisition.
- c. Have additional cartridges available or a second TASER ready to fire in case probes miss the target or there is a malfunction.
- d. When practical have back up present and develop a plan to capture and restrain while the subject is under power or upon conclusion of the cycle as practical, so as to minimize the duration of the struggle and any adverse physiological effects.
- e. Aim at the lower center of mass for frontal shots and the center of mass for back shots.
- f. When practical, use cover and distance to ensure Security Officer safety.
- g. Use the "drive stun mode" only as a secondary option.
- h. Deployment is generally prohibited in an environment where the subject's fall is likely to cause substantial injury or death such as use on slanted roofs, the edge of

buildings, operating or riding in or on any mode of transportation, conveyance or machinery. (Vehicle, bus, bicycle, skateboard, skates, rollerblades or machinery.)

- i. Avoid deployment on elevated platforms such as climbing a wall or fence where a fall might be more injurious.
- j. Deployment is generally prohibited in an environment where the subject(s) are in or near a drowning hazard.
- k. Do not use against a subject in physical control of a vehicle in motion, unless circumstances justify using deadly force.
- l. Identify witnesses to the deployment.

20. Use on a Restrained and Non-compliant Subject

- a. Deployment is prohibited against handcuffed or otherwise restrained subjects unless the subject has become an aggressor, attacks the officer, or there is fear for the safety of the Security Officer and others, or lower level techniques have been exhausted or would be ineffective or impractical.
- b. Use the TASER in a manner that is likely to produce neuro-muscular incapacitation (NMI). So as to minimize the duration of the struggle and any adverse physiological effects.
- c. The alligator clip is the preferred method. The alligator clip cartridge is secured to the subject in a manner that is likely to produce neuro-muscular incapacitation. (NMI) (The clips can be affixed to clothing or taped to the skin with white medical tape.) Secure the unused live TASER cartridge(s) in a safe location in adherence to training.
- d. If probe deployment is to be used, achieve neuro-muscular incapacitation to the extent possible under the

circumstances. Take steps to reduce the chance of unintentional probe deployment into non-target areas. (Stabilize the subject with empty hand control and deploy the probes from a close range then spread the effect by placing the drive stun away from the probe site area.)

21. The following inappropriate uses of the TASER may result in disciplinary action:

- a. Extracting contraband or in any type of punitive or reckless manner.
- b. Needless display of the TASER
- c. Careless or haphazard muzzle control of the TASER
- d. Using the TASER or threatening to use the TASER during an interrogation
- e. Using the TASER to awaken a person
- f. Using the TASER as a “prod”
- g. Using the TASER on an apparent helpless person or an individual with an apparent or severe disability
- h. Careless storage of the TASER
- i. Failing to report damage to a TASER
- j. Failing to log out a TASER or TASER cartridge in accordance with policy
- k. Security Officers shall evaluate lower level techniques and use caution before deploying a TASER on the elderly,

females reasonably believed to be pregnant, and individuals with apparent physical disabilities impairing their mobility. The use of the TASER on such subjects is inappropriate absent exigent circumstances. Such inappropriate uses of the TASER may result in disciplinary action.

22. OC (Pepper Spray)

- a. The only chemical weapon authorized for Security Officers out on patrol is the oleoresin capsicum (OC) or "pepper spray." OC spray will be issued to Security Officers only after completing required training given by a certified instructor. Chemical agents shall be used only to the extent the Security Officer reasonably believes is necessary at the time and within training standards to overcome the resistance of the suspect.
- b. Chemical sprays shall not be used to elicit information nor shall they be used on people who are handcuffed, secured, and non-aggressive.
- c. OC spray shall not be used in the Casino.
- d. Apply an amount that is reasonable enough to effectively control the subject.
- e. Treatment of subjects exposed to OC spray:
 - i) Preferred method—allowing the subject access to plenty of water and fresh air.
 - ii) No toweling or rubbing of the eyes should be allowed.
 - iii) If contact lenses were contaminated they should be disposed of so as not to allow secondary contamination to occur.

- iv) No creams, salves or ointments should be provided.
 - v) Washing the facial skin with mild soap is allowable; however, nothing but fresh water should be used in the eyes.
 - vi) If the subject is unable to remove eye contacts transport to hospital for removal.
 - vii) Those persons exposed should be monitored for at least 60 minutes for respiratory distress or a sign of other types of distress after exposure has occurred.
- f. Medical treatment should be given if;
- i) Requested by the subject,
 - ii) Signs of respiratory or other types of distress are noted or
 - iii) Recovery from exposure takes more than 45 minutes.
- g. Communication
- i) If subject is exposed to OC spray inform responding Security Officers or Armed Officers of this information.
 - ii) When Law Enforcement or Medical Attention (EMS) arrives inform them the subject was exposed to OC spray to allow proper procedure to be followed by Law Enforcement or EMS.
 - iii) In the event the subject is not contained after initial OC exposure it is imperative that the responding Law Enforcement or Armed Officers know and attempt to avoid an electronic controlling device such as a Taser.

5. Hard Control Techniques (Closed Hand and Kick Tactics)

- a. When the above listed techniques are ineffective, impractical, or the subject becomes more aggressive, the Security Officer may seek compliance by additional physical means. The Security Officer may employ the use of hands, fists, feet, knees, and so on in striking an adversary, according to methods sanctioned through training. This level would include strikes, kicks, and takedowns.

PROCEDURES - Deadly force

1. Firearms - General

- a. Deadly force may be used:
 - i. In defense of the Security Officer or others from what is reasonably believed to be an immediate threat of death or serious bodily harm.
 - 1. In evaluating a "significant threat," the Security Officer must reasonably believe that the person has either used deadly force or may inflict death or serious harm to the officer or others if apprehension is delayed.
 - 2. Where feasible, officers shall identify themselves and give a warning before shooting.
 - 3. To kill seriously injured or dangerous animals when no other disposition is reasonably practical. A Security Supervisor's approval should be sought when possible.

2. The following should be considered prior to discharging a firearm at a suspect:

- a. The direction the firearm is to be discharged.
- b. Is the suspect in plain view? Extreme caution must be used at night, as darkness may obscure the officer's vision and adversely affect accuracy.

- c. The danger of firing the firearm while running or jumping due to the possibility that other persons or property may be struck by the projectile(s).
 - d. The potential for dangerous ricochet.
- 3. If possible and when time and conditions permit, a Security Officer should assume a position for which he/she has been trained, prior to the discharge of the firearm.
- 4. Discharge of Firearms at Animals - The following are guidelines to aid the Security Officer who may be required to destroy an animal:
 - a. If time permits, Security Officers will adhere to the following steps:
 - i. Ensure the safety of all citizens, property, and other animals by moving the animal to be destroyed to an area of relative safety and, if possible, out of public view. The primary concern is that the animal should be placed on the ground (in lieu of pavement) to decrease the possibility of ricochet.
 - ii. Shoot the animal from close range (five to fifteen feet, if possible).
 - iii. Shoot "down" into the animal so the projectile, if exiting the animal's body, will enter the ground.
 - iv. Shoot the animal in the brain to minimize suffering. EXCEPTION: If the possibility exists that the animal has rabies or has bitten someone, the animal should not be shot in the brain. In this case, the animal should be shot in the chest cavity, directly behind either front leg.
 - b. A Security Officer responsible for destroying an animal must submit a report as soon after the incident as possible.

5. Shotgun

- a. The shotgun shall only be used when a possibility exists that the Security Officer will be dealing with an armed suspect, e.g., armed robbery in progress, or searching for armed suspects.
- b. Shotguns shall be encased and properly stored when not in preparation for use. When the shotgun is not encased, it shall be carried with the safety on at all times until there is an immediate need to fire the weapon.
- c. Regular inspections of the shotgun must be completed.
- d. During regular firearms qualification, each officer authorized to use a shotgun shall be required to demonstrate proficiency with it.

PROCEDURES – Limitations on force

1. The following acts associated with the use of force are prohibited.
 - a. Firing into crowds.
 - b. Firing a warning shot.
 - c. Firing into a building or through doors when the person fired at is not clearly visible unless Security Officers are being fired upon from such building or through such door.
 - d. Firing at a suspect when lesser force could be used and the Security Officer believes that the suspect can be apprehended reasonably soon thereafter without the use of deadly force, or when there is any substantial danger to innocent bystanders.
(When in doubt, don't shoot.)
 - e. Application of choke holds, except when the Security Officer reasonably believes such holds are the only means of protecting him/herself or another person from an imminent threat of serious physical injury or death. Choke holds are not to be confused with the lateral vascular neck restraint.
 - f. Any use of force not reasonable in the light of the circumstances confronting the Security Officer.

2. No Security Officer shall carry or use any firearm, or weapon of any kind unless authorized and properly trained.
 - a. Security Officers who fail to pass the firearms qualifications (duty weapon) shall be relieved of their armed duties and immediately reassigned to unarmed duties until such time the officer can pass the firearms qualifications.
 - b. Security Officers who have taken extensive leave or suffered an illness or injury that could affect the use of firearms or non-deadly weapons shall re-qualify before returning to duty.

PROCEDURES – Reporting Use of Force

1. Officers shall document **any** application of force, which goes beyond passive resistance, except for those arising in training or departmental demonstrations. Any time a Security Officer specifically aims or points a firearm (sidearm or shotgun) at an individual, a report form will be filled out documenting the incident. Active pointing of a firearm will be defined as raising the weapon above the universal cover position on an individual.
2. Exceptions
 - a. A report will not need to be filled out for specifically pointing a firearm in the case of a hostage/barricade incident.
 - b. Should a Security Officer be injured and cannot complete the report, the immediate Security Supervisor will ensure the report is completed by another Security Team Member.
 - c. The report shall be forwarded to the Director of Security.
 - d. Any information contained on the report will not be released to persons or agencies outside the department without prior approval from the Director of Security.
 - e. The shift supervisor will be notified by the Security Officer using force when:
 - i. Any application of force is used
3. The Security Manager/Supervisor will ensure that the Director of Security is notified when:

- a. A subject is seriously injured as the result of a Security Officer's use of force.
- b. A Security Officer utilizes lethal force.
- c. A Security Officer requires medical attention as a result of a suspect using force.

PROCEDURES – Departmental Response

1. Assignment

- a. Pending administrative review, any officer whose action(s) or use of force has taken the life of or seriously injured another person shall be removed from their duty assignment. Prior to the Security Officer(s) returning to a duty assignment, an administrative review, a psychologist's fit-for-duty release, and an incident debriefing are mandatory. The return of the Security Officer(s) to a line-duty assignment will be no less than 7 days.

2. Review

- a. The Security Officer's manager shall review all reported uses of force to determine whether:
 - i. Departmental orders were violated.
 - ii. Relevant departmental policy was clearly understandable and effective to cover the situation.
 - iii. Departmental training was adequate.
 - iv. If it is determined that departmental orders were violated, the information will be forwarded to the Director of Security.

3. Internal investigations

- a. Internal investigations of serious applications of force may be of two types: first, an administrative investigation to determine whether department standards were followed; and second, a criminal investigation to detect lawbreaking. A criminal investigation shall be discontinued whenever the department is satisfied that no misconduct occurred.

4. Psychological services

- a. A critical incident debriefing will be mandatory for any member who in the line of duty:
 - i. Discharges a firearm at another person, injuring or killing the person.
 - ii. Is injured as a result of an assault with a firearm.
 - iii. Is referred to a psychologist by a supervisor following a shooting incident.
- b. A psychologist's evaluation for a fit-for-duty release is mandatory for any member:
 - i. Who was involved in an incident where the Security Officer attempted to take the life of another.
 - ii. Who is the victim of an assault with a firearm.
 - iii. In any other situation the Director deems appropriate.

PROCEDURES – Investigation of Disarming of Officers and Discharge of Firearm

1. General

- a. The Director of Security will investigate incidents in which a Security Officer is disarmed or discharges a firearm, on or off duty, except for the following situations engaged in by the Security Officer:

- i. Firearms qualification, target practice, hunting and sporting events, ballistic exams, and similar circumstances.
 - ii. Situations involving the destroying of an animal unless there is a question about whether department policy was followed.
- b. The investigation conducted by the Director of Security will be in addition to any criminal investigation conducted, and the criminal investigation will take precedence.
- c. Immediately following the disarming of a Security Officer or the discharge of a firearm, it will be the responsibility of the Security Officer(s) involved to notify their immediate supervisor.
- d. Following the discharging of a firearm, the Security Officer involved will protect the weapon and ammunition for examination by the immediate supervisor and for possible examination by a lab.
 - i. When a Security Officer is injured and has discharged a firearm, the Security Officer's immediate supervisor or the supervisor in charge of the scene will ensure that the firearm and ammunition are secure and made available for examination.
- e. Following the discharging of a firearm, the Security Officer and his/her immediate supervisor will ensure that the area around the incident is preserved until a thorough investigation by law enforcement can be conducted.
- f. The Director of Security will decide who will conduct a criminal investigation into the shooting of a person by a DCR Security officer.

PROCEDURES – Discharge of Firearm Report

1. General

- a. Each time a Security Officer discharges a firearm he/she shall submit a detailed report of the circumstances.
- b. The report will be submitted as soon as possible after the incident through the chain of command to the Director of Security.

2. Procedure

- a. A discharge of firearm report shall be completed. This will be completed in addition to any other related reports that may need to be completed.
- b. The report will be completed in the following sequence and contain the following information:
 - i. Name and ID number of the Security Officer who discharged the firearm.
 - ii. Date and time of occurrence.
 - iii. Location of occurrence.
 - iv. Type, caliber, and serial number of the firearm(s) discharged.
 - v. Type and caliber of ammunition fired.
 - vi. Number and direction of shots fired.
 - vii. Description of object fired at (if person, give name, race, sex, DOB, etc., if known.
 - viii. Whether or not the object fired at was moving, standing, or barricaded.
 - ix. Whether or not the Security Officer was standing, running, barricaded, etc.
 - x. Results of the shot(s) fired (extent of wounds, other objects struck, etc.)

- xi. Names of supervisor and investigative personnel responding to the scene.
- xii. Other pertinent information concerning the incident written in narrative form. To be included are the reasons for the use of firearms, etc.