Downstream Authority of the Quapaw Tribe of Oklahoma Regular Meeting
August 12, 2010

Meeting Called to Order: 10:05 am

ROLL CALL:	John Berrey, Chairman	Present
	Vice-Chairman	Vacant
	Larry Ramsey, Secretary	Present
	Ranny McWatters, Treasurer	Present
	Marilyn Rogers, Member	Present

DECLARATION OF QUORUM: announced by Larry Ramsey
Steve Drewes/ Tim Brown/Jack Brill

Discussion of new DDA member
- John nominated Tamara Smiley to fill the position

Motion by DDA Treasurer Ranny McWatters to nominate Tamara Smiley as a member of the DDA. Seconded by DDA member Tamara Smiley. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.
- DDA will send nomination to the BC for final approval and appointment.

Buffalo Enclosure
Ernie/Roger
- Fence to run along the state line on the east side
- Walking trail will be on the Oklahoma side
- Barbed wire and pipe fencing
- Barn – loafing shed
    - 12'Dx32'L

Walkway from Casino to Pavilion
- Facilities is getting proposals/quotes
- Possibilities
    - Metal flat roof
    - Shingle/trusses to match the pool bar
    - Canvas "blinds"
    - Pana flex half moon (golf course)

Hotel
- Final coffee shop furniture presented
- Nebraska Furniture Mart, #19997816
- Purchase 3, $169 per set

Consensus of the DDA to move forward

PR
- Annual report attached
- Empire Electric
    - Co-host media event on new energy efficient programs

Consensus of the DDA to co-host the event

- Pavilion Sound
    - Pipe and drape are best option, custom set heavy velour material, black
    - Sean will meet with Jerri to begin pricing

General Manager Updates

- EMT uniforms
  - Requesting to have a cargo pant
  - Option presented, standard stock piece

Consensus of the DDA to go with option presented

- EVS/Housekeeping
  - Review new smock options
  - Stock colors and options presented
  - DDA requested additional samples
- Coat Check
  - New shirt presented
  - Stock, easily obtainable
- Investor Call
  - General discussion of the call later today
- Joplin Chamber Golf Tournament
  - Aug 20, 2010
  - Twin Hills
  - John/Larry/Ranny/Steve to play
- Wayfinder
  - Hotel entrance - move out of the center of the entrance
- Ops Controller
  - 12 candidates have applied
  - Kent did the initial interviews
  - The top 2-3 will be brought in for a second interview
  - Thursday 8/19 – top interviews
- TIF
  - Alan Mauk at the next meeting to discuss
- Company Cell Phone Policy
  - DDA requested a change to the policy to allow phones to be used for personal calls

Consensus of the DDA to make the change, Steve will present the new policy when it is complete.

Policies

- See attached
- 3000.02.01 – Food and Beverage Variance and Paperwork Policy

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6310.03.01 – Patron Complimentary Point Liability Calculation Policy

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1100.28.01 – Three Card Poker

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 7400.05.01 – Emergency Operating Procedures

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6230.04.01 – Promotion Submission Procedures

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6320.20.01 – Accounts Payable Policy

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1200.12.01 – Jackpot Payouts

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6200.14.01 – Concert Q-Play Procedures

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.14.01 – Processing Coupons

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6320.75.01 – DCR Chip Destruction

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1105.11.01 – Hot Seat Drawing Rules for Poker

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.09.01 – Patron Disputes – Front Money/Safekeeping

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.39.01 – Currency Bagging and Verification in the Main Bank

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.29.01 – TRU Problem Log and Machine Testing Log

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.44.02 – Issuing Casino Outlet Floats through the Main Bank

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1105.10.01 – Poker Room Tournament Bad Beat Progressive Jackpot Promotion

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6320.08.01 - Payroll

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.68.01 – Processing Craps Tokes Through the Main Bank

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.71.01 – No ID Jackpots Processed in the Cage

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.56.02 – Entering and Leaving the Mantrap Area of the Cage

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6020.01.01 – Internal Audit Policy

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.17.01 – EZ Pay "Find" Ticket Function

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.19.01 – Accepting and Depositing Company Funds

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.41.01 – Main Bank Count In Procedures

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.32.02 – Table Credits

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.15.01 – Gift Card Procedures

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.33.01 – Processing Valet Tokes Through the Main Cage

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.43.01 – Dealer Tokes

Motion by DDA Member Marilyn Rogers to approve policy. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 1400.69.01 – Cage Robbery Procedures

Motion by DDA Secretary Larry Ramsey to approve policy. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

- 6200.15.01 – Ambassador Q-Club Card Sign-Up Program

Motion by DDA Treasurer Ranny McWatters to approve policy. Seconded by DDA Member Marilyn Rogers. Vote: JB: yes; LR: Yes; RM: yes; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

2010/2011 Budget

- See attached proposed Operating budget

Motion by DDA Treasurer Ranny McWatters to approve budget as presented. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: absent; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

Wage structure

- See attached proposed changes to the current wage structure
- Will become effective the first pay period in October
- Increase will be across the board even if team member is making more that the minimum for the position

Motion by DDA Member Marilyn Rogers to approve proposed wage structure. Seconded by DDA Secretary Larry Ramsey. Vote: JB: yes; LR: Yes; RM: absent; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

Year end Bonuses (fiscal year end)

- Non Salaried positions
  - 90 days to 1 year - $50
  - 1 yr to 2 years - $100
  - 2+ years - $200

- Salaried Position
  - 90 days to 1 year - $250
  - 1 year to 2 years - $500
  - 2+ years - $1000

- Top three groups will receive their approve percentage plus an additional 10% of that.

Motion by DDA Member Marilyn Rogers to approve yearend bonus plan as presented. Seconded by DDA Treasurer Ranny McWatters. Vote: JB: yes; LR: Yes; RM: absent; MR: yes (4 yes, 0 no, 0 abstaining, 0 absent, 1 vacant) Motion Carries.

Sales

- Propose change to Org chart
- Sales would now report directly to Tim and not be a part of Marketing
- Catering (Banquets) would report to the sales manager
- Consensus of the DDA to make the change to the Sales Org Chart – official motion to be made when finalized Org Chart is presented

Hotel Yield Analysis

- Position to be eliminated – no need, hotel has been at capacity for the multiple months.
- Team member can look for other position with the organization
- DDA authorized a 6 week severance package if alternate position cannot be found.

Tribal Career Development Officer

- General discussion

12:21 pm – Break

1:00 pm – Investor Call

- 800-475-6701 – replay number
- 167662 – pin number

- Team member request for DDA to approve pre-payment to Doctor for mini-gastric bypass procedure

Consensus of the DDA to approve payment.

General Council

- Recap of outstanding balance due
- DDA to cover the expenses for the banquet and the door prizes from Sam's.

Donations

- Crowder College Faculty Association – Silent auction, room and dinner -YES
- Ronald McDonald House of the Four States – Prize package; $150 hole/$600 team - YES
- AA Charity Golf Tournament (Special Olympics) - $2000, 4 golfers/signage/commemorative package - YES
- MoDOT District 7 – United Way/Employee Fund campaign – Prize item, room and dinner - YES
- Leggett & Platt –United Way Campaign – Raffle Item, room and dinner - YES
- Justin Thompson Memorial Foundation Golf Tournament - NO
- Ozark Center for Autism, Walk for Autism Awareness - $5000 presenting sponsor - YES
    - Starting line banner
    - In all PSA's
    - Puzzle Pieces Along the Route
- Benefit for Jackie Chavez and Michelle Mynatt – Auction Item, 2 night stay & dinner at Red Oak - YES
- Kansas Wesleyan University Men's Soccer - $500 - YES
- TFI Family Services, Golf tournament - $225 team - YES
- Drury University Women's Golf , Silo Ridge - $480 team - YES
- Arkansas Support Network, concert - $500 - NO
- MS Victory – Lewis & Clark Boating for a Cure Expedition - $3000 Admiral Sponsor - NO

Adjourn 2:00 pm

Accepting and Depositing Company Funds	Policy No: 1400.19.01	Issue Date: 8/9/2010
PURPOSE: To establish procedures and controls for accepting and depositing company funds in the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/21/2010
Compliance Review	8/2/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010

POLICY

Downstream Casino Resort (DCR) shall comply with a minimum bankroll formula, which shall be made available to the Quapaw Tribal Gaming Agency (QTGA), to ensure cash or cash equivalents are maintained in an amount sufficient to satisfy obligations to DCR patrons as they are incurred. See policy Minimum Bankroll Verification (#6310.01.01) for minimum bankroll requirements.

A Cage Shift Manager or above will be instructed by the Cage Manager and/or the Director of Finance or above as to the minimum amount of currency which should remain in the Main Bank inventory at the end of each gaming day. Any shift in the Cage may prepare the deposit for the courier pickup.

The Cage Manager and/or the Director of Finance or above may determine the needs of DCR and on occasion may order coin and/or currency to be delivered from DCR's approved financial institution.

PROCEDURES

COURIER RECEIPT OF DEPOSIT

1. A Main Bank Cashier or above will be instructed as to the minimum amount of currency which should remain in the Main Bank inventory at the end of each gaming day. (The total is determined by a spreadsheet formula.) The grave shift shall have the primary responsibility of preparing deposits for courier pickup. When necessary to comply with minimum bankroll requirements, all shifts may be required to prepare deposits for courier pickup.

2. The Main Bank Cashier or above will bag the currency being deposited in tamperproof bags and fill out a 3-part deposit slip with the amount to be deposited. The white copy will go in the bag and the yellow and pink will be used for balancing purposes.

3. The Main Bank Cashier or above will have all deposit bags prepared, the courier's log book filled out with the bag numbers and the date of deposit and the white copy of the deposit slips are sealed in the bags awaiting the arrival of the courier representative.

4. The Courier shall notify Surveillance prior to arrival for all scheduled pick-ups. A Surveillance Operator shall contact Security Dispatch of the need of a Security Officer to report to the Main Cage for a Bank Courier escort for deposit transfer. The Surveillance Operator shall also notify a Cage Supervisor or above with an estimated time of arrival.

5. When the courier truck arrives, a Surveillance Operator shall give the clearance for Security to escort the courier representative from the Security Entrance on the north side of the Casino through the mantrap into the Main Bank. **<u>A Cage Supervisor or above must be present during any transactions between DCR and the courier to ensure all procedures are followed</u>**.

6. Once in the Main Bank the courier representative will take inventory of the bags going out and compare them to the bag numbers and totals on the courier's log. Once the courier representative agrees with the bags going out he/she shall sign the courier's log acknowledging the pick-up.

7. Once the transaction is complete, the Security Escort will notify Surveillance and get clearance to escort the courier representative to the Main Bank and out the man trap.

8. The Security Officer shall escort the courier representative to the armored car, wait until the funds are safely secured and locked in the vehicle, and ensure the courier representative has safely entered the vehicle and driven away.

ACCEPTANCE OF FUNDS FROM A COURIER

1. When DCR orders funds from the financial institution, the courier service shall be contacted and made aware of the delivery.

2. The Courier shall notify Surveillance prior to arrival for all scheduled pick-ups/deliveries. A Surveillance Operator shall contact Security Dispatch of the need of a Security Officer to report to the approved entry area for a Bank Courier escort for a currency delivery. The Surveillance Operator shall also notify a Cage Supervisor or above with an estimated time of arrival.

3. The Cage Supervisor or above shall instruct the Main Bank Cashier of the pending cash/coin arrival. The main Bank Cashier shall clear the Main Bank counter of all funds in preparation of the transfer.

4. When the courier truck arrives, a Surveillance Operator shall give the clearance for Security to escort the courier representative from the Security Entrance on the north side of the Casino through the mantrap into the Main Bank. **<u>A Cage Supervisor or above must be present during any transactions between DCR and the courier to ensure all procedures are followed</u>**.

5. Once the funds are delivered to the Main Bank, the Cage Supervisor or above shall bulk verify the amounts of each denomination and each bag of coin delivered.

6. Once the funds are bulk verified, the Cage Supervisor or above shall sign the courier's acknowledgement of receipt.

7. The Main Bank Cashier or above shall enter the amounts received into the ABACUS system while the courier representative is still in the Main Bank by the following:

    a. Choose "**Receive"** under **Locations**

    b. Choose "**IBC Bank"**

    c. Enter the amounts by denomination

    d. Select "**Save"**

    e. Select "**Yes"** if it is a good printout

8. The Main Bank Cashier or above and the courier representative shall both sign the ABACUS receipt. The Main Bank will retain both copies of the receipt for balancing purposes.

9. Once the transaction is complete, the Security Escort will notify Surveillance and get clearance to escort the courier representative through the Main Bank and out the man trap.

10. The Main Bank Cashier or above shall notify Surveillance begin the process of verifying each strap of currency on a 2-pocket currency counter, re-strapping it and blending all the received coin and/or currency into the Main Bank inventory.

ACCOUNTS PAYABLE POLICY	Policy No: 6320.20.02	Issue Date: 7/28/2010
PURPOSE: Establish standard operating policy and procedures for processing invoices and subsequent disbursements.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/28/2010
Compliance Review	6/10/2010
QTGA Submission	6/10/2010
QTGA Return	6/24/2010
Compliance Review	6/25/2010
QTGA Submission	7/1/2010
QTGA Final Approval	7/28/2010
GM Approval	6/29/2010
DDA Final Approval	8/12/2010
Compliance Revision to DDA Approved Final	9/30/2010
QTGA Submission	10/7/2010
QTGA Final Approval	Pending
GM Approval	Pending
DDA Final Approval	Pending

POLICY

It is the policy of Downstream Casino Resort (DCR) to establish procedures that Accounts Payable Team Members follow to ensure all disbursements are authorized and accurate.

PROCEDURES

The following procedures will be followed to process invoices for payment. If a situation should arise that is not covered in this Policy, refer to the Accounting Manager. If the Accounting Manager is unavailable or unsure, refer to the Chief Financial Officer (CFO).

1. Quapaw Tribal Gaming Agency (QTGA) must register/license all vendors before orders are placed.

2. Accounts Payable (A/P) will maintain all vendors in Infinium, which is the General Ledger and Accounts Payable software.

    a. They must obtain all pertinent information for new vendors and modify company information for existing vendors as necessary.

b. Each vendor must be set up properly in A/P before processing any transactions in Materials Management System (MMS).

c. A W-9 (pg. 7) must be on hand before any vendor, except for customers, garnishments, and Team Members, is set-up.

Invoice Entry

1. A/P staff will enter all invoices that do not reference a Purchase Order into the Infinium Payables module in batches. For technical information, refer to Infinium *Procedures for Entering in A/P.*

   a. Invoices are to be date stamped upon receipt. The General Ledger account number will be written on the invoice. These steps are both done by the A/P clerks. If unsure of proper coding, A/P clerks will review coding with A/P Lead, Staff Accountant, Accounting Manager, or CFO.

   b. A/P clerks are expected to key in all approved invoices on a daily basis.

   c. Invoices are considered approved once a Department Director has reviewed, signed name and badge number and dated the invoice or completed check request (pg. 6) has turned it into A/P. A completed check request has the following:

      i. Request date

      ii. Invoice number

      iii. Dollar amount

      iv. Requestor

      v. Department

      vi. Date required

      vii. Vendor name

      viii. General Ledger account number

      ix. Purpose

      x. Account Description

      xi. Requestor Signature, badge number and date

xii. Approval Signatures, badge numbers and date

xiii. Vendor contact, phone number, address, and ID number are optional since the information is in Infinium.

d. Invoice number as well as all other fields on the check request shall be completed before the disbursement of funds may be approved.

e. Invoice numbers on the check request shall be sequentially numbered when possible.

f. Completed forms should detail the purpose of the requested expenditures and specify which departmental general ledger account number they are to be drawn from.

g. If a check request is to be expensed to a charitable donation it needs to be verified that it qualifies as a charitable donation under federal tax law. (See Donations Policy #6100.04.01 for details on donations.)

h. A written explanation is required before processing payments to an entity utilizing a different expense account allocation than that was previously used with the vendor.

i. A/P clerks shall ensure check request forms are fully completed. A completed check request must include all signatures and badge numbers that are required for the corresponding dollar amount of the check request.

j. A check request form shall also have the proper signatures.

   i. The General Manager or a DDA member can authorize any dollar amount.

   ii. CFO can authorize up to $20,000.

   iii. Site Liaison or Department Director can authorize up to $5000.

   iv. If the General Manager or DDA member is not available, the CFO can then authorize an invoice over $20,000.

k. A written explanation is required before processing a check request to an entity that, at first glance, appears unconnected with the purpose of the transaction.

2. A/P Clerks will proof their batches daily.

3. A/P Lead will review all batches for accuracy. The Accounting Manager will then review each batch and give their initials and badge number for the batch to be posted by an A/P Clerk.

4. Accounting Manager will initial each batch indicating that batches have been checked according to policy.

5. Accounting Manager or above will close to Infinium Accounts Payable transactions to the Infinium General Ledger at the end of each day.

Check Run

1. A/P Lead or a designated A/P Clerk will prepare and process a weekly check run.

2. The check run is to include all invoices for a vendor that are currently due or will become due within the next 13 days.

3. Accounting Manager then reviews the check run and authorizes the check run in the Infinium A/P system.

4. A/P Lead or a designated A/P Clerk then prints the checks and check register. The invoice number or the reason for payment is printed under the Invoice column on the check document.

5. After processing the check run, A/P Lead or a designated A/P Clerk will match checks with corresponding documentation package(s). The documentation packages should be placed in the same order as invoices appearing on the front of each check.

6. A Staff Accountant will then verify with tic marks that each check is written to the correct vendor and that each invoice that is referenced on the check is attached to the check package.

7. After review, the Staff Accountant will initial the A/P copy of the check.

Signing of the checks

1. Checks may be signed by the CFO or General Manager.

Disbursement of Checks

1. A/P staff will separate the original check from the supporting documentation package.

2. The check will be sealed and sent for mailing by the A/P Team Members.

3. The supporting documentation package, including a copy of the original check will be placed in the appropriate vendor file in the A/P Department.

DOWNSTREAM CASINO RESORT
Downstream Development Authority

Check Request Form

Request Date: ____________ Requestor: ____________
Amount: ____________ Department: ____________

Invoice No. ____________ Date Required: ____________
____________ **(Do Not Use ASAP)**

Vendor Contact: ____________ Vendor Phone No.: ____________

Vendor Name: ____________

Address: ____________

City/State/Zip: ____________

Vendor ID No.: ____________
Purpose: ____________

Account Number: ____________
Account Description: ____________

Requestor: ____________
Signature Date

Site Liaison or Department Director ____________
Up to $5,000
Signature Date

Chief Financial Officer ____________
$5,000.01 - $20,000.00
Signature Date

General Manager ____________
$20,000.01 and above
Signature Date

Form **W-9**
(Rev. October 2007)
Department of the Treasury
Internal Revenue Service

Request for Taxpayer Identification Number and Certification

Give form to the requester. Do not send to the IRS.

Print or type
See Specific Instructions on page 2.

Name (as shown on your income tax return)

Business name, if different from above

Check appropriate box: ☐ Individual/Sole proprietor ☐ Corporation ☐ Partnership
☐ Limited liability company. Enter the tax classification (D=disregarded entity, C=corporation, P=partnership) ▶ ....
☐ Other (see instructions) ▶
☐ Exempt payee

Address (number, street, and apt. or suite no.)

Requester's name and address (optional)

City, state, and ZIP code

List account number(s) here (optional)

Part I **Taxpayer Identification Number (TIN)**

Enter your TIN in the appropriate box. The TIN provided must match the name given on Line 1 to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

Social security number

or

Employer identification number

Part II **Certification**

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. See the instructions on page 4.

Sign Here Signature of U.S. person ▶ Date ▶

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),

2. Certify that you are not subject to backup withholding, or

3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity,

Cat. No. 10231X Form **W-9** (Rev. 10-2007)

Ambassador Q-Club Card Sign Up Program	Policy No: 6200.15.02	Issue Date: 8/9/2010
PURPOSE: To establish procedures for Ambassadors to follow when signing up new Q-Club card participants. This will provide an opportunity to raise the new Q-Club card sign up numbers, drive trips, and enhance business at Downstream Casino Resort.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
Compliance Review	7/20/2010
QTGA Submission	7/22/2010
QTGA Return	8/2/2010
Compliance Review	8/4/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010
Revisions to Final	9/2/2010
QTGA Submission	9/9/2010
GM Approval	Pending
QTGA Final Approval	Pending
DDA Final Approval	Pending

PROCEDURES

1. If an Ambassador or Q-Club Representative finds a patron on the Casino floor that is not using a Downstream Casino Resort (DCR) Q-Club card, the following shall occur:

   a. Ambassador or Q-Club Representative shall approach the patron and ask if they currently have a Q-Club card with DCR or if they are interested in signing up for a Q-Club card with DCR.

   b. If the patron is interested in signing up for a Q-Club card, the Ambassador or Q-Club Representative shall obtain the patron's valid photo ID. Acceptable forms of ID are:

      i. U.S. Military ID Card

      ii. U.S. Passport

      iii. U.S. Foreign Passport (written in English)

      iv. U.S. Driver's License

      v. Green Card (Permanent Resident)

   For details on valid acceptable ID's at DCR, see Universal ID Acceptance Policy, #6320.15.01.

2. Once the patron provides a valid ID, the Ambassador or Q-Club Representative shall do the following:

    a. Check the patron's ID to ensure that the patron is 18 years of age or older.

    b. Ensure that the patron's ID has the correct mailing address.

    c. Ask for the patron's phone number, email address, and a four digit PIN number.

    d. Take the patron's ID and information to the Q-Club desk.

    e. Go into the Patron Database and F3 to make sure they do not have an account.

    f. If the patron does not have a Q-Club account, place photo ID face down on scanner.

    g. Select the type of photo ID from the drop down menu.

    h. After the ID is scanned, verify that all the information transferred correctly from the ID to Patron Management. Any information that did not transfer correctly needs to be changed manually.

    i. After verifying that all the information is correct click finish to bring up the patron's account.
    j. Once the Ambassador or Q-Club Representative gets the necessary information from the patron, he/she shall take the valid photo ID to the Q-Club desk and enroll the patron.

    k. Ambassador or Q-Club Representative will then give the patron back their photo ID along with a temporary Q-Club card that can be used until the patron has a chance to go to the Q-Club desk to receive a permanent Q-club card.

    l. The temporary card will state that the patron must take the temporary card to the Q-Club desk by 11:59 PM on the same day as sign-up to retrieve the permanent Q-Club card and any promotional item that may be offered for signing up.

3. When the patron is ready to obtain the permanent Q-Club card, the following shall occur:

    a. Patron shall return the temporary card to the Q-Club desk.

    b. A Q-Club representative shall ask for a valid photo ID (See Universal ID Acceptance Policy, #6320.15.01 for information on acceptable ID's.) and will pull up the patron's Q-Club account to print their permanent Q-Club card and to obtain the patron's official signature.

    c. A Q-Club representative shall issue the promotional item if one was offered. The Q-Club representative shall utilize F12 coupon on the computer to redeem the promotional item.

    d. A Q-Club representative will give the patron their permanent Q-Club card.

e. If a promotional item was offered, a Q-Club representative will explain to the patron how to use the promotional item.

Eligibility Criteria for Q-Club card sign-up

1. Patron must be at least 18 (eighteen) years of age.

   f. Patron must have a valid photo ID at the time of sign up. Refer toUniversal ID Acceptance Policy (#6320.15.01) for acceptable forms of identification.

2. Patron cannot have a previous Q-Club account with DCR. (Must be a new sign up.)

DOWNSTREAM CASINO RESORT

FY 2010 / 2011 Budget

Account Description	October	November	December	January	February	March	April	May	June	July	August	September	Total	%
Gaming Revenue, net	10,147,057	8,763,186	9,683,393	9,836,227	10,501,763	11,186,037	10,144,732	10,494,636	9,476,648	11,664,069	10,161,203	9,425,336	121,484,288	
Hotel Revenue	527,295	513,501	529,126	520,820	475,997	564,514	531,201	537,870	548,479	582,214	582,214	539,001	6,452,232	
Retail Revenue	53,249	48,058	58,309	47,249	48,575	54,989	47,968	55,859	51,228	59,469	56,469	57,968	639,390	
F & B Revenue	989,473	878,655	991,360	817,706	911,705	909,603	833,940	1,019,594	983,262	1,153,480	1,048,216	959,051	11,496,047	
Entertainment Revenue	11,892	11,892	11,892	11,892	11,892	11,892	11,892	65,406	65,406	150,512	65,406	85,106	515,080	
Other Revenue	154,450	139,350	153,200	178,144	191,153	200,460	182,407	187,538	185,901	201,313	193,270	180,407	2,147,594	
TOTAL REVENUE	11,883,416	10,354,642	11,427,280	11,412,039	12,141,086	12,927,495	11,752,140	12,360,903	11,310,925	13,811,058	12,106,778	11,246,869	142,734,631	
TOTAL COST OF GOODS SOLD	483,846	446,966	477,259	431,604	463,458	468,674	437,113	499,246	480,715	545,269	513,512	483,211	5,730,873	
NET REVENUE	11,399,570	9,907,676	10,950,021	10,980,434	11,677,628	12,458,821	11,315,028	11,861,657	10,830,210	13,265,788	11,593,266	10,763,658	137,003,757	
TOTAL SALARIES & WAGES	2,153,167	2,079,369	2,188,560	2,188,616	1,984,666	2,186,943	2,119,735	2,192,739	2,137,013	2,206,540	2,200,058	2,131,463	25,768,870	
TOTAL BENEFITS	1,079,412	1,040,772	1,096,464	1,100,320	992,494	1,099,354	1,063,292	1,100,544	1,070,790	1,106,140	1,103,427	1,067,485	12,920,493	
TOTAL LABOR & BENEFITS	3,232,579	3,120,141	3,285,024	3,288,935	2,977,160	3,286,297	3,183,027	3,293,283	3,207,804	3,312,680	3,303,485	3,198,949	38,689,363	
TOTAL COMP EXPENSE	426,778	360,352	402,590	423,909	325,422	299,036	343,241	468,363	413,784	495,237	394,656	372,316	4,725,682	
TOTAL OPERATING EXPENSES	3,165,337	2,896,540	3,115,534	2,705,928	2,761,539	2,938,447	3,033,293	3,165,164	3,210,216	3,704,863	3,138,446	3,123,311	36,958,618	
EBITDA	4,574,877	3,530,644	4,146,873	4,561,663	5,613,507	5,935,041	4,755,467	4,934,848	3,998,407	5,753,008	4,756,679	4,069,083	56,630,095	
INTEREST EXPENSE, NET	2,996,124	2,962,442	2,996,124	2,996,124	2,895,079	2,996,124	2,962,442	2,996,124	2,962,442	2,996,124	2,996,124	2,962,442	35,717,714	
DEPRECIATION AND AMORTIZATION	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	1,440,332	17,283,984	
NET INCOME (LOSS)	138,421	(872,131)	(289,583)	125,207	1,278,096	1,498,585	352,692	498,392	(404,368)	1,316,552	320,223	(333,691)	3,628,397	
EBITDA Margin %	39.9%	35.3%	37.6%	41.5%	47.5%	47.0%	41.7%	41.5%	36.7%	43.2%	40.6%	37.4%	41.0%	
Comp Expense as a % of Gaming Revenue	4.2%	4.1%	4.2%	4.3%	3.1%	2.7%	3.4%	4.5%	4.4%	4.2%	3.9%	4.0%	3.9%	
Slot WPU	163.42	144.56	156.33	157.42	189.19	182.02	170.49	170.43	157.94	190.36	164.07	151.64	166.83	
Table WPU	767.35	797.98	757.58	791.79	854.98	806.45	762.63	782.01	760.14	830.89	806.45	792.93	792.24	

Cage Robbery Procedures	Policy No: 1400.69.01	Issue Date: 8/9/2010
PURPOSE: To establish policies and procedures in the event of a cage robbery.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
QTGA Submission	6/10/2009
QTGA Return	11/12/2009
Compliance Review	4/29/2010
QTGA Submission	4/29/2010
QTGA Return	5/6/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/21/2010
Compliance Review	7/28/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010

POLICY

In the event of a robbery, Downstream Casino Resort's (DCR) first concern is for Team Members and patrons. Try to remain calm and be safe. Do what the person requests and don't ask questions. Do not do anything to antagonize the person.

PROCEDURE

During a Robbery

1. Do not resist in any way.

2. Obey instructions.

3. Do not plead in any way or antagonize the robber.

4. If possible give the cash to the robber beginning with the one dollar bills unless otherwise instructed by the robber.

5. Avoid quick or unnatural movements that might cause the robber to react.

6. Consider the robber armed and dangerous even though a weapon is not displayed.

7. Consider all firearms loaded and dangerous.

8. Activate the alarm by pressing the button, notifying Surveillance, as long as the robber has left.

After a Robbery

1. Secure any currency that is left on the counter by placing the currency in the drawer with two fingers. Make every attempt not to handle the currency more than necessary.

2. Do not touch anything. No one should go near or touch anything on the inside or outside of the Cage Cashier window.

3. Notify Security, Surveillance, and Quapaw Tribal Gaming Agency (QTGA) Compliance Agent or above immediately and then call a Cage Shift Supervisor.

4. The Cage Cashier or above shall be isolated in the Cage Shift Manager's office. The Cage Cashier or above that had dealings with the robber shall not discuss the incident with anyone except the Cage Supervisor, Security, or law enforcement officers. It is Security's responsibility to notify the QTGA Investigator of any generated reports once complete.

5. The Cage Cashier or above shall begin writing a statement while everything is still fresh in his/her mind.

Be Observant

1. Note physical description and characteristics of the robber (i.e., tone of voice, walk, right or left-handed, type and description of clothing worn, facial hair, hair color, glasses, scars, jewelry, etc.);

2. Type of weapon (revolver or automatic, chrome or blue, caliber, type of grips);

3. Height of robber in relation to other objects in the area;

4. Any suspected accomplices;

5. Route of escape taken by the robber;

6. When law enforcement officers arrive, answer questions as accurately as possible, advising the officers of what you know, saw, and heard. If you don't know the answer to an officer's questions, let them know you do not know.

8/19/10

Downstream Casino Resort
FY 2011 Capital Requests

Description	Timing	Amount	Priority	Criticality of Expenditure A	B	C	Total
Security							
1 Security Vehicles	1st Q	$ 36,000.00	A	36,000	-	-	36,000
1 Security vehicle	3rd Q	$ 36,000.00	B	-	36,000	-	36,000
Office Furniture	1st Q	$ 6,000.00	A	6,000	-	-	6,000
Photo Quality Printer	4th Q	$ 1,500.00	C	-	-	1,500	1,500
Cameras	4th Q	$ 1,500.00	C	-	-	1,500	1,500
2 Way Radios and related	1st Q	$ 8,000.00	A	8,000	-	-	8,000
Total Security		$ 89,000.00					
Food and Beverage							
Bakery	3rd Q	$ 268,000.00	A	268,000	-	-	268,000
Pavillion Kitchen Equipment	4th Q	$ 250,000.00	C	-	-	250,000	250,000
Pavillion Kitchen Building	4th Q	$ 100,000.00	C	-	-	100,000	100,000
Wa Na Bee Dae Remodel	3rd Q	$ 75,000.00	B	-	75,000	-	75,000
Buffalo Grill Remodel	4th Q	$ 250,000.00	C	-	-	250,000	250,000
New Coolers	1st Q	$ 60,000.00	A	60,000	-	-	60,000
Total Food and Beverage		$ 1,003,000.00					
Hotel and Related							
ATV for Horticultalist	4th Q	$ 6,000.00	C	-	-	6,000	6,000
Chairs for Reservations Agents	1st Q	$ 3,887.00	A	3,887	-	-	3,887
Electric Mobility Chair	4th Q	$ 4,000.00	C	-	-	4,000	4,000
Suite Bar Stools	1st Q	$ 6,300.00	A	6,300	-	-	6,300
VIP Lounge Bar Stools	1st Q	$ 5,040.00	A	5,040	-	-	5,040

Laundry Cart Building	3rd Q	$ 17,672.00	B	-	17,672	-	17,672
Duplex Hydro Washers-EVS	1st Q	$ 6,481.00	A	6,481	-	-	6,481
Duplex Hydro Washers-Hotel	3rd Q	$ 6,481.00	B	-	6,481	-	6,481
Wide Area Vacuum	1st Q	$ 2,680.00	A	2,680	-	-	2,680
Trash Cans	3rd Q	$ 5,837.00	B	-	5,837	-	5,837
T-1 Scrubber	1st Q	$ 2,751.00	A	2,751	-	-	2,751
Dyson Airblades	1st Q and 2nd Q	$ 83,790.00	A	83,790	-	-	83,790
Speed X Extractor	1st Q	$ 2,290.00	A	2,290	-	-	2,290
Total Hotel and related		$ 153,209.00					
Gaming and Related							
Poker							
Poker Dealer Chairs	1st Q	$ 8,400.00	A	8,400	-	-	8,400
Poker Tables	1st Q	$ 23,600.00	A	23,600	-	-	23,600
Total Poker		$ 32,000.00					
Slots							
Slot conversions and related	1st and 3rd	$ 350,000.00	A	350,000	-	-	350,000
Radios	1st	$ 10,000.00	A	10,000	-	-	10,000
Signage	3rd Q	$ 60,000.00	B	-	60,000	-	60,000
Bases	1st and 3rd	$ 50,000.00	A	50,000	-	-	50,000
Game simulators and testers	1st Q	$ 57,550.00	A	57,550	-	-	57,550
Test equipment	1st Q	$ 5,000.00	A	5,000	-	-	5,000
Office equipment and software	1st Q	$ 2,100.00	A	2,100	-	-	2,100
Total Slots		$ 534,650.00					
Surveillance							
Digital Surveillance Upgrade	1st through 4th Q	$ 460,000.00	A	460,000	-	-	460,000
Supplemental Camera Additions	1st through 4th Q	$ 64,400.00	A	64,400	-	-	64,400
Total Surveillance		$ 524,400.00					

Finance							
Currency Counters	2nd Q	$ 11,000.00	A	11,000	-	-	11,000
Casino Kiosks	2nd Q contigent on ATI	$ 260,000.00	A	260,000	-	-	260,000
Kronos- Employee Benefit Roll out	1st Q	$ 25,000.00	A	25,000	-	-	25,000
IGT CMS Marketing System	3rd Q	$ 250,000.00	B	-	250,000	-	250,000
Complete Document Control Suite	1st Q	$ 25,000.00	A	25,000	-	-	25,000
Kronos-Quapaw	1st Q	$ 15,000.00	A	15,000	-	-	15,000
Kronos-Scheduler	3rd Q	$ 60,000.00	B	-	60,000	-	60,000
Total Finance		$ 646,000.00					
IT							
Telephone replacements	1st through 4th	$ 10,000.00	A	10,000	-	-	10,000
PC Replacements	1st through 4th	$ 30,000.00	A	30,000	-	-	30,000
Projectors for Banquets	3rd Q	$ 28,000.00	B	-	28,000	-	28,000
Hotel encoder	3rd Q	$ 5,000.00	B	-	5,000	-	5,000
Disk Recovery software	4th Q	$ 4,000.00	C	-	-	4,000	4,000
Exchange upgrade	2nd Q	$ 40,000.00	A	40,000	-	-	40,000
Data Storage and Backup up Solution	2nd Q	$ 300,000.00	A	300,000	-	-	300,000
Securelink	1st Q	$ 5,000.00	A	5,000	-	-	5,000
Virtual PC's	3rd Q	$ 50,000.00	B	-	50,000	-	50,000
Resnet 3 panel	1st Q	$ 8,000.00	A	8,000	-	-	8,000
Total IT		$ 480,000.00					
Public Relations/Communications/Entertainment							
Internal Communications system	3rd Q	$ 55,000.00	B	-	55,000	-	55,000
Total Public Relations/Comm		$ 55,000.00					
Marketing							
MGT Kiosk	4th Q	$ 150,000.00	C	-	-	150,000	150,000
Bus Wraps	4th Q	$ 64,000.00	C	-	-	64,000	64,000
Concert and related equipment	3rd Q	$ 500,000.00	B	-	500,000	-	500,000
Total Marketing		$ 714,000.00					

Facilities

Daycare	1st Q	$ 1,500,000.00	A	1,500,000	-	-	1,500,000
Street Sweeper	3rd Q	$ 35,000.00	B	-	35,000	-	35,000
RODEO ARENA	4th Q	$ 2,000,000.00	C	-	-	2,000,000	2,000,000
BOBCAT	1st Q	$ 15,000.00	A	15,000	-	-	15,000
20' ONE MAN GENIE LIFT	1st Q	$ 15,000.00	A	15,000	-	-	15,000
DUMP TRUCK	2nd Q	$ 20,000.00	A	20,000	-	-	20,000
PORTABLE LIFT STATION PUMP	3rd Q	$ 5,000.00	B	-	5,000	-	5,000
HEAVY DUTY TRAILER	3rd Q	$ 18,000.00	B	-	18,000	-	18,000
AUTOCAD	1st Q	$ 3,000.00	A	3,000	-	-	3,000
REPLACE CASINO ROOF	4th Q	$ 1,250,000.00	C	-	-	1,250,000	1,250,000
ENCLOSE SWIMMING POOL	4th Q	$ 2,000,000.00	C	-	-	2,000,000	2,000,000
GOLF CART REPLACEMENT	3rd Q	$ 15,000.00	B	-	15,000	-	15,000
30' 2 MAN GENIE LIFT	3rd Q	$ 23,000.00	B	-	23,000	-	23,000
34 NEW 2 WAY RADIOS @ $300 EA	2nd Q	$ 10,200.00	A	10,200	-	-	10,200
TRADE IN FACILITIES TRUCKS FOR NEW	4th Q	$ 45,000.00	C	-	-	45,000	45,000
SNOW BLADES FOR FACILITIES TRUCKS	1st Q	$ 8,000.00	A	8,000	-	-	8,000
45HP MEDIUM DUTY ALL TERRAIN TRACTOR	1st Q	$ 35,000.00	A	35,000	-	-	35,000
ANNUAL TOOL REPLACEMENT	1st through 4th	$ 12,000.00	A	12,000	-	-	12,000
Total Facilities		$ 7,009,200.00					
Contingency		$ 500,000.00	A	500,000	-	-	500,000
Total Other		$ 500,000.00					
Total Requested		$ 11,740,459.00		$ 4,369,469	$ 1,244,990	$ 6,126,000	$ 11,740,459

8/19/10

Downstream Casino Resort

FY 2011 Capital Requests

Description	Timing	Amount	Priority
Security			
1 Security Vehicles	1st Q	$ 36,000.00	A
Office Furniture	1st Q	$ 6,000.00	A
2 Way Radios and related	1st Q	$ 8,000.00	A
Total Security		$ 50,000.00	
Food and Beverage			
Bakery	3rd Q	$ 268,000.00	A
New Coolers	1st Q	$ 60,000.00	A
Total Food and Beverage		$ 328,000.00	
Hotel and Related			
Chairs for Reservations Agents	1st Q	$ 3,887.00	A
Suite Bar Stools	1st Q	$ 6,300.00	A
VIP Lounge Bar Stools	1st Q	$ 5,040.00	A
Duplex Hydro Washers-EVS	1st Q	$ 6,481.00	A
Wide Area Vacuum	1st Q	$ 2,680.00	A
T-1 Scrubber	1st Q	$ 2,751.00	A
Dyson Airblades	1st Q and 2nd Q	$ 83,790.00	A
Speed X Extractor	1st Q	$ 2,290.00	A
Total Hotel and related		$ 113,219.00	
Gaming and Related			
Poker			
Poker Dealer Chairs	1st Q	$ 8,400.00	A
Poker Tables	1st Q	$ 23,600.00	A
Total Poker		$ 32,000.00	
Slots			
Slot conversions and related	1st and 3rd	$ 350,000.00	A
Radios	1st	$ 10,000.00	A
Bases	1st and 3rd	$ 50,000.00	A
Game simulators and testers	1st Q	$ 57,550.00	A
Test equipment	1st Q	$ 5,000.00	A
Office equipment and software	1st Q	$ 2,100.00	A
Total Slots		$ 474,650.00	

Surveillance				
Digital Surveillance Upgrade	1st through 4th Q	$	460,000.00	A
Supplemental Camera Additions	1st through 4th Q	$	64,400.00	A
Total Surveillance		$	524,400.00	
Finance				
Currency Counters	2nd Q	$	11,000.00	A
Casino Kiosks	2nd Q contigent on ATI	$	260,000.00	A
Kronos- Employee Benefit Roll out	1st Q	$	25,000.00	A
Complete Document Control Suite	1st Q	$	25,000.00	A
Kronos-Quapaw	1st Q	$	15,000.00	A
Total Finance		$	336,000.00	
IT				
Telephone replacements	1st through 4th	$	10,000.00	A
PC Replacements	1st through 4th	$	30,000.00	A
Exchange upgrade	2nd Q	$	40,000.00	A
Data Storage and Backup up Solution	2nd Q	$	300,000.00	A
Securelink	1st Q	$	5,000.00	A
Resnet 3 panel	1st Q	$	8,000.00	A
Total IT		$	393,000.00	
Facilities				
Daycare	1st Q	$	1,500,000.00	A
BOBCAT	1st Q	$	15,000.00	A
20' ONE MAN GENIE LIFT	1st Q	$	15,000.00	A
DUMP TRUCK	2nd Q	$	20,000.00	A
AUTOCAD	1st Q	$	3,000.00	A
34 NEW 2 WAY RADIOS @ $300 EA	2nd Q	$	10,200.00	A
SNOW BLADES FOR FACILITIES TRUCKS	1st Q	$	8,000.00	A
45HP MEDIUM DUTY ALL TERRAIN TRACTOR	1st Q	$	35,000.00	A
ANNUAL TOOL REPLACEMENT	1st through 4th	$	12,000.00	A
Total Facilities		$	1,618,200.00	
Contingency		$	500,000.00	A
Total Other		$	500,000.00	
Total Requested		$	4,369,469.00	

CHIP DESTRUCTION	Policy No: 6320.75.01	Issue Date: 8/4/2010
PURPOSE: To establish policy and procedures for the destruction of Downstream Casino Resort Chips.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/4/2010
Compliance Review	7/27/2010
QTGA Submission	7/29/2010
QTGA Final Approval	8/4/2010
GM Approval	7/28/2010
DDA Final Approval	8/12/2010

POLICY

According to the Quapaw Tribal Internal Control Standards for Gaming Operations, Downstream Casino Resort (DCR) shall establish and comply with procedures for the receipt, inventory, storage, and destruction of gaming chips and tokens.

PROCEDURES FOR THE DESTRUCTION OF DCR CHIPS

1. DCR established procedures for the receipt, inventory, and storage of DCR chips. See "Casino Chips into Inventory" policy #1400.75.01 for detailed procedures.

2. All DCR chips in inventory shall be stored in the Chip Bank. This includes DCR chips that are marked for destruction. Reasons for destruction of DCR chips may include:

   a. Damaged or broken chips

   b. Decommissioned chips (See "Decommissioning of Casino Value Chips", policy #1400.72.01 and "Decommissioning of Non-Value Poker Tournament Chips", policy #1400.60.01 for information on decommissioned chips.)

3. When DCR chips are ready for destruction, the Compliance Department shall prepare an Activity Review Form (pg.3) requesting approval by QTGA of the chip destruction. The Activity Review Form contains the following information:

   a. Type/Name of Activity

   b. Department

   c. Submission Date

d. Date, Time, Place of Activity

e. Narrative Description

f. Policy/Activity Approval

g. Departments Impacted

h. Department Director Authorization signature and badge number, date

i. DCR Compliance Manager/Officer Authorization signature and badge number, date

j. QTGA Authorization signature and badge number, date

4. The Compliance Department shall indicate on the Activity Review Form when the chip destruction will occur and shall provide an inventory list of chips that are scheduled to be destroyed.

5. The Compliance Department shall also include the methodology for destroying the DCR chips. There are various ways to destroy DCR chips, thus the methodology for destroying chips may be different each time. For instance, chips may be destroyed by being cut in half or buried in concrete. In any case, the methodology shall be in a manner approved by QTGA.

6. Once QTGA approves the Activity Review Form, the Compliance Department shall provide Security and Surveillance a copy of the form.

7. When the destruction of the DCR chips is scheduled to occur, Income Audit, QTGA, DCR Compliance, and Security shall be present to witness the destruction. QTGA shall verify the inventory list that was attached to the Activity Review Form with the DCR chips to ensure the appropriate chips are being destroyed. Once the chips have been destroyed, all witnesses shall sign, with signature and badge number, the Activity Review Form indicating the chip destruction.

Quapaw Tribal Gaming Agency

Date Rcvd	
Action	
Reviewed By	
Approved	Tentative
Not Approved	Final

ACTIVITY REVIEW FORM

Type/Name of Activity: *One-time Event* *On-going Event*	***Department:***	***Submission Date:*** ***Date/Time/ Place***
Narrative Description:		***Policy and Activity Approval.***
Departments Impacted:		

Department Director Authorization

____

Date: ____________________________________

Compliance Manager/Officer

____

Date:____________________________________

QTGA Authorization

____

Date: ____________________________________

Concert Q-Play Procedures	Policy No: 6200.14.01	Issue Date: 7/29/2010
PURPOSE: To establish procedures for issuing Q-Play on patrons' Q-club Cards when attending Downstream Casino Resort concerts.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/29/2010
Compliance Review	6/7/2010
QTGA Submission	6/10/2010
QTGA Return	6/24/2010
Compliance Review	6/24/2010
QTGA Submission	7/1/2010
QTGA Final Approval	7/29/2010
GM Approval	6/29/2010
DDA Final Approval	8/12/2010

POLICY

Downstream Casino Resort (DCR) offers free Q-play for patrons that attend DCR concerts. The procedures for issuing Q-play to patrons on their Q-Club card follow.

CONCERT Q-PLAY PROCEDURES

1. Portable card swipes are provided to the Marketing representatives so that they may capture patron data. Marketing representatives shall wear the portable card swipes around their neck.

2. All patrons that have Q-Club cards can be swiped into the portable card swipe for Q-play preload. The Marketing representative shall ask the patron, upon entering the concert, for the Q-Club card and swipe it in the portable card swipe so that the patron can receive the free Q-play for attending the concert.

3. Approximately one hour before the concert is scheduled to end, the portable card swipes shall be provided to the Information Technology (IT) Department. The IT Department shall take all the portable card swipes inside so that all the information can be downloaded.

4. The IT Department shall connect each portable card swipe to a pc to download the information into the access database.

5. In the Access database, the IT Department shall audit the downloaded data to ensure that duplicate swipes are deleted.

6. Q-Club Card numbers are then converted to the patron ID numbers through a connection to the Patron Management database.

7. The IT Department shall then export the patron ID numbers into an Excel spreadsheet. The excel spreadsheet shall be imported into a group in the Patron Management system.

8. Once the IT Department imports the group in the Patron Management system, each patron in that group is loaded with the free Q-play for attending the concert.

Processing Craps Tokes Through the Main Bank	Policy No: 1400.68.01	Issue Date: 8/5/2010
PURPOSE: To establish policy and procedures for processing Craps tokes through the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
Compliance Review	4/29/2010
QTGA Submission	4/29/2010
QTGA Return	5/6/2010
Compliance Review	6/22/2010
QTGA Submission	6/22/2010
QTGA Return	7/21/2010
Compliance Review	7/28/2010
QTGA Submission	7/29/2010
GM Approval	7/30/2010
QTGA Final Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

Craps Dealer tokes are acceptable, but may not be solicited by Dealers. The following is the proper procedure for accepting, maintaining, and distributing Craps Dealer tokes.

PROCEDURES

Accepting Tokes

1. When a toke is generated, the Dealer will collect and hold the toke in plain view of surveillance camera in a Table Games Toke box with a clear window on the front.

Maintaining Tokes

1. When the Dealers have completed their assigned shift, a Dealer shall take their toke box to the Main Bank Jackpot Window, to be counted by a Main Bank Cashier, along with a (3) part Craps Dealer's Tip Worksheet (page 4).

2. Each Craps Dealer shall print their name on the Craps Dealer's Tip Worksheet, along with their badge numbers and the date, denoting that the funds belong to a designated group and the Dealers shall also sign their signature and badge numbers on the Dealer's Signature lines.

3. Before beginning the process the Main Bank Cashier shall call surveillance and timestamp the Toke worksheet.

4. The Main Bank Cashier shall unlock the Toke Box, empty the contents and briefly display the box to show it is empty to surveillance.

5. The Main Bank Cashier shall count all the contents of the Toke box by denomination.

6. Once the tokes have been counted the Main Bank Cashier shall fill out the rest of the Dealer's Worksheet. The Worksheet contains the following information:

    a. A name line with badge number for up to four Craps Dealers.

    b. Date

    c. Total Amount of Tokes

    d. Amount to the Supervisor's Pool

    e. Amount to Dealers Pool

    f. Total Amount

    g. Dealer's Share for up to four Dealers

    h. Craps Dealer's signature and badge number lines

    i. Cage Cashier's Signature and badge number line

7. The Main Bank Cashier shall calculate the Craps Dealer's tokes as follows:

    a. Calculate the total tokes received from the Dealers

    b. Divide this number by two (1/2 of the Dealer Tokes received is written on the "Amount to Dealer", to be divided between the Dealer's listed on the Toke Worksheet)

    c. The other half, the Dealer's Pool half. The balance is written on the "Amount to Dealer's Pool".

    d. The combined total of the two figures goes in the "Total Amount".

8. Table Games Dealer tokes are distributed in the following manner:

    a. 50% of the Tokes to the actual Dealer's listed on the Toke worksheet

    b. 50% of the Tokes to a Common Dealer pool

9. The Main Bank Cashier will write the denomination totals on the right of the form and these totals will be entered into the Cage ABACUS system by the following:

    a. Select “Receive” from location.

    b. Enter Password.

    c. Choose “Table Games Tokes”.

    d. Choose “Dealer Pool”.

    e. Enter the total amount by denomination.

    f. Select “Save” and a receipt shall print.

    g. Sign the receipt with the Cashier’s signature and badge number.

    h. Select “Yes” received a good print out.

10. All deposits shall be reported by Income Audit to the payroll Department at the end of each pay cycle.

Distribution of Tokes

1. Tokes will be allocated by payroll to the Table Games Dealer’s listed on the Craps Dealer’s Tip Worksheet.

2. The Table Games Shift Manager shall review and approve the Craps Dealer toke pool.

3. All tokes will be disbursed on the Craps Dealer’s normal pay check.

4. Tokes may never be accepted as cash, any failure to comply with this policy will be considered an attempt to circumvent reporting and be subject to the Dealer’s discipline up to and including termination.

5. Nothing in the policy prevents the Management of Downstream Casino Resort, the Downstream Development Authority, Quapaw Tribal Gaming Agency, Internal Revenue Service, or any other applicable agency from taking further action against as may be deemed necessary.

DOWNSTREAM CASINO RESORT

CRAPS DEALERS TiP WORKSHEET

1. Name: Mary Merrey ID# 3333
2. Name: Shawna Shuffle ID# 4444
3. Name: Joe Blow ID# 5555
4. Name: Don Wan ID# 6666

Date: 1-1-10 Total Amount of Tokes: 100

		Dealer's Share
Amount to the Supervisors Pool:	Ø	1. 12.50
Amount to Dealer:	50	2. 12.50
Amount to Dealers Pool:	50	3. 12.50
Total Amount:	100	4. 12.50

1. Dealers Signature: X X ID# 4444
2. Dealers Signature: X X ID# 3333
3. Dealers Signature: X X ID# 6666
4. Cashiers Signature: Starrin ID# 153

White - Cage Yellow - Accounting Pink - Table Games Down SP 20682

CURRENCY BAGGING AND VERIFICATION IN THE MAIN BANK	Policy No: 1400.39.01	Issue Date: 8/5/2010
PURPOSE: Establish policy and procedures to control and monitor the bagging and verification of currency in the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	7/29/2010
GM Approval	7/30/2010
QTGA Final Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

1. Verification of currency is required by the Main Bank in order to maintain the integrity of the inventory in the bank. This is the method by which all currency straps are checked for accuracy and secured in tamper resistant bags.

PROCEDURES

1. All currency that is received into the Main Bank must be verified before use. Currency brought into the bank from Soft Count shall be immediately bagged in a tamper resistant bag. The Main Bank Cashier shall write the date and his/her name and badge number on the bag.

2. Each time a bag is opened; the bag must be re-verified and then re-strapped by the Main Bank Cashier who opened it. All straps shall be broken and the currency verified by the Main Bank Cashier. The Main Bank Cashier must write the date on the straps and write his/her initials with badge number on the straps. Under no circumstances should any monies leave the bank without being verified.

3. All bagged currency shall be rotated each day to ensure the currency with the oldest date is used and/or deposited first.

Dealer Tokes	Policy No: 1400.43.01	Issue Date: 8/9/2010
PURPOSE: To establish policy and procedures for processing Dealer tokes through the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	4/29/2010
QTGA Submission	4/29/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/10/2010
DDA Final Approval	8/12/2010

POLICY

Dealer tokes are acceptable, but may not be solicited by Dealer. The following is the proper procedure for accepting, maintaining, and distributing Dealer tokes.

PROCEDURES

Accepting Tokes

1. When a toke is generated, the Dealer will collect and deposit the toke in a Table Games Toke box.

Maintaining Tokes

1. When the Dealer has completed his/her assigned shift, the Dealer shall take their toke boxes to the Main Bank Jackpot Window, to be counted by a Main Bank Cashier, along with a Table Game Dealers Tip Worksheet (Page 5).

2. The Dealer shall write his/her name on the Table Game Dealers Tip Worksheet, a (3) part form, along with their badge number and the date. The Dealer shall also sign their signature and badge number on the Dealer's Signature line.

3. The Dealer shall fold the Table Game Dealers Tip Worksheet and place it in the top slot of the Dealer Toke box and turn the box into the Main Bank Cashier.

4. Before processing the Tokes, the Main Bank Cashier shall inform surveillance before beginning the processing.

5. The Main Bank Cashier shall unlock the Dealer Toke Box, empty the contents and briefly display the box to show it is empty to surveillance.

6. The Main Bank Cashier shall timestamp the Table Game Dealers Tip Worksheet.

7. The Main Bank Cashier shall count all the contents of the Dealer Toke box by denomination.

8. Once the tokes have been counted the Main Bank Cashier shall fill out the rest of the Table Game Dealers Tip Worksheet. The Worksheet contains the following information:

    a. Table Games Dealer Name and Badge Number

    b. Date

    c. Total Amount of Tokes

    d. Amount to the Table Games Supervisor's Pool

    e. Amount to Table Games Dealer

    f. Amount to Table Games Dealer's Pool

    g. Total Amount

    h. Table Games Dealer's Signature and badge number

    i. Main Bank Cashier's Signature and badge number

9. The Main Bank Cashier shall calculate the Table Games Dealer's tokes as follows:

    a. Calculate the total tokes received from the Dealer.

    b. Divide this number by two (1/2 of the Dealer Tokes received is written on the "Amount to Dealer's Pool")

    c. The other half, the Dealer's half, is minus the Cashier's Toke (if any). The balance is written on the "Amount to Dealer".

    d. Add the "Amount to Dealer's Pool" and the "Amount to Dealer" and this figure goes in two places on the sheet. "Total Amount of Tokes" and "Total Amount". These should agree.

10. If the Table Games Dealer decides to compensate the Cage, the toke to the Cage shall be taken from the 50% split that would go to the actual Dealer and the amount would be at the Dealer's discretion.

11. Table Games Dealer tokes are distributed in the following manner:

    a. 50% of the Tokes to the actual Dealer

    b. 50% of the Tokes to a Common Dealer pool.

    c. Any tokes to the Main Bank Cashier shall be taken from the "Amount to the Dealer".

12. The Main Bank Cashier will write the denomination totals on the right of the form and these totals will be entered into the Cage ABACUS system by the following:

    a. Select "Receive" from location.

    b. Enter Password.

    c. Choose "Table Games Tokes".

    d. Choose the name of the Dealer.

    e. Enter the total amount paid to the Dealer by denomination.

    f. Select "Save" and a receipt shall print.

    g. Sign the receipt with the Cashier's signature and badge number.

    h. Select "Yes" received a good print out.

13. The white and yellow copy of the Toke worksheet shall go to Audit at the end of the Main Bank Shift and the pink copy shall be held in the Main Bank until a Table Games Shift Supervisor or above retrieves them to be distributed to the Dealers.

14. All deposits shall be reported by Income Audit to the Payroll Department at the end of each pay cycle.

<u>Distribution Tokes</u>

1. Tokes will be allocated by payroll to the Table Games Dealer's listed on the Table Games Dealers Tip Worksheet.

2. The Table Games Shift Manager shall review and approve the Table Games Dealer toke pool.

3. All tokes will be disbursed on the Dealer's normal pay check.

4. Tokes may never be accepted as cash, any failure to comply with this policy will be considered an attempt to circumvent reporting and be subject to the Dealer's discipline up to and including termination.

5. Nothing in the policy prevents the Management of Downstream Casino Resort, the Downstream Development Authority, Quapaw Tribal Gaming Agency, Internal Revenue Service, or any other applicable agency from taking further action against as may be deemed necessary.

DOWNSTREAM
CASINO RESORT

TABLE GAME DEALERS TIP WORKSHEET

Name: Jack Jackson
ID Number: 1234

Date: 1-1-10
Total Amount of Tokes: 38

Amount to the Supervisors Pool: Ø

Amount to Dealer: 18 (cage tip $2) Red 31
White 7

Amount to Dealers Pool: 20

Total Amount: 38

Dealers Signature: X X
ID# 1234

Cashiers Signature: Starwin
ID# 153

White - Cage   Yellow - Accounting   Pink - Employee   SP 20054

EGM - JACKPOT PAYOUTS	Policy No: 1200.12.01	Issue Date: 6/1/2008 Revised Date: 9/1/2009 11/30/2009 3/10/2010 4/21/2010 6/11/2010
PURPOSE: To establish policy and procedures for paying Jackpots.		

DCR Compliance – ITEM Tracking	Date
Issue Date	6/01/2008
Compliance Review	5/8/2009
Compliance Review	9/1/2009
QTGA Submission	9/23/2009
Compliance Review	11/30/2009
QTGA Submission	12/2/2009
QTGA Return	12/21/2009
Compliance Review	1/12/2010
QTGA Submission	03/12/2010
QTGA Return	4/2/2010
Compliance Review	4/21/2010
QTGA Submission	4/22/2010
QTGA Return	5/6/2010
Compliance Review	5/10/2010
QTGA Submission	5/11/2010
QTGA Return	5/27/2010
Compliance Review	6/2/2010
QTGA Submission	6/3/2010
QTGA Return	6/10/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Final Approval	7/28/2010
GM Approval	6/22/2010
DDA Final Approval	8/12/2010

POLICY

1. It is the policy of the Downstream Casino Resort to mandate that EGM (Electronic Gaming Machine) Team Members utilize and properly follow the procedures for Jackpot Payouts of Cash or Checks that are not paid directly from the EGM.

PROCESSING JACKPOTS

1. When arriving at an EGM, the EGM Attendant or above will look for the following items:

    a. The reels showing the jackpot symbols and/or a winning bingo pattern.

    b. That the jackpot symbols line up properly on the pay line(s).

    c. The machine is “locked up” in a jackpot mode.

2. Non Progressive Jackpots are defined as any win that is $1,200 or higher on one single bet. Progressive Jackpots may be for any amount. These Jackpots will be processed as a regular Jackpot but if they are less than $1,200 no W2G (pg. 18-20) will be issued. If the EGM does not show a jackpot win, but is “locked up”, it is processed as a “Cancel Credit”.

3. The EGM Attendant or above will insert their assigned system card in the card slot and perform the following using the keypad on the screen:

    a. Enter their personal system user PIN (4 digit code) and press enter.

    b. A menu option should appear. Press 1 for jackpot. It should then state that win amount is available at FJP (Fill Jackpot) Station. Press enter.

    c. Wait until the screen says remove card and remove the system card.

    d. Verify the screen says “Awaiting Attendant Return”.

4. Proceed to the FJP room or to an AJM (Automated Jackpot Machine). If payout is $2,999.99 or less, see AJM section (pg. 6).

5. Prior to processing the jackpot in the system, an EGM Attendant must fill out the Jackpot Log (pg. 17) located at the FJP or AJM.

6. Complete a pre-numbered Starter Ticket (pg. 11) including the following information:

    a. Type of payout (Jackpot or Cancel Credit)

    b. Date/Time

c. Shift

d. Denomination of EGM

e. EGM, asset number, and location

f. Amount of payout (both alpha and numeric)

g. Signature and badge number of preparer

h. Signature and badge number of verifier(s)

i. Coin(s) played

j. Line(s) played

k. Game Outcome (Winning Reel Combination including reel symbols, card values, suits)

7. Verify that the government issued photo identification provided by the winning patron is valid by inspecting the following:

    a. It is current (the expiration date has not passed).

    b. When a social security card is provided, the name on the Social Security card matches the identification provided.

8. The EGM Attendant must contact an EGM Supervisor or above immediately if the ID provided by a winning Patron has the following issues:

    a. An expired date

    b. Appears invalid

    c. Appears fake

    d. Possibly for the wrong person

9. When a social security card is not provided, a W-9 (pg. 22-25) Form must be completed. The W-9 Form is located on the reverse side of the Starter Ticket:

    a. Social security number.

    b. Their name (last, first, middle).

c. Correct address (no PO boxes allowed).

d. Signature of Patron.

e. Current date.

f. By signing the W-9 Form, the winning Patron is attesting that the social security number and included information is correct. The W-9 substitutes as the second form of identification required to alleviate taxation on a jackpot win. The Patron can elect to have from zero (0) taxes to the entire win amount withheld. Standard withholding amount is 28% of the total jackpot amount. Taxes will not be taken out for a "Cancel Credit" regardless of the amount and a W2-G is not required.

10. When a Foreign ID is presented, the EGM Attendant must call an EGM Supervisor or above. The EGM Supervisor or above will explain to the Patron that a 1042-S (pg. 12-16) will be required and 30% taxes must be deducted from the Jackpot Amount. The EGM Supervisor or above will then fill out the 1042-S. The 1042-S is only to be used if a foreign ID is given.

11. The following signatures are required on the Starter Ticket and FJP/AJM Handpay Voucher (Pg. 26-27) for the stated jackpot amount levels:

    a. $1,200 to $9,999 – A Cage attendant or above is required when issuing funds. An EGM Attendant or above is required at the receipt of payment. A second verifier is required when payment is made to the winning Patron at the EGM.

    b. $10,000 to $24,999 – A Cage attendant or above is required when issuing funds. An EGM Attendant or above is required at the receipt of payment. A second verifier, as well as an EGM Shift Supervisor or above is required when payment is made to the winning Patron at the EGM.

    c. $25,000 or above – A Cage attendant or above is required when issuing funds. An EGM Attendant or above is required at the receipt of payment. A second verifier, as well as an EGM Shift Supervisor or above and a Table Games Shift Manager, Security Shift Manager or another supervisory or management Team Member independent of the EGM department.

12. Second verifiers would include another EGM attendant or Supervisor, Security Team Member, or a Casino host.

13. For all jackpots of $5,000 or more, you must contact Security for an escort to the EGM prior to leaving the Cage area. When Security arrives, proceed with the payout to the winning Patron at the EGM with Security escort. Security will notify Surveillance of the jackpot payout.

14. In the event that there is a discrepancy between the jackpot amount as recognized by the Slot Management System (SMS) and the amount recorded by the EGM Attendant, the EGM Attendant will fill out the information on the Starter Ticket and immediately notify an EGM Supervisor or above. The EGM Supervisor or above will visually verify the EGM and ensure that the information on the Starter Ticket is correct. All overrides must be processed at the Cage. See Overrides (SMS Cage Inoperable) on pg. 8.

15. Swipe your system ID card to access SMS System. Enter your password.

16. While logged in the SMS System, the Jackpot will show up on the first screen. Click on Jackpot.

17. Input the following Patron information for the W2G processing:

    a. Name;

    b. Address (No P.O. Box)

    c. Social Security number;

    d. Government issued ID number and expiration; and

    e. Tax withholding amount if applicable.

18. After completing the W2G data click “print”. The W2G will print at the Cage cashier window.

19. Proceed to the Cage window with the Patron’s ID and Starter Ticket. If the winner is requesting a check for all or any amount, an announcement of this information will be declared to the Main Banker at this time. The Main Banker will provide the Hand Pay Voucher and the W2G. The Main Banker will count the currency to the EGM attendant. The EGM attendant will verify by counting the currency again prior to leaving the cashier window. The initiating EGM attendant or above shall sign on the floor person line for the money. If there is a discrepancy, the EGM attendant will place the currency back on the counter and notify the cashier. The Main Banker will retain the cashier copy portion of the Hand Pay Voucher with all necessary signatures.

20. With the payout, the W2G and the Accounting Copy portion of the Hand Pay Voucher, proceed to EGM and call for a witness. Once witness arrives at the EGM, insert EGM Attendant card and enter system user PIN. The witness shall be another EGM Attendant or above.

21. Return the Patron’s ID, Social Security card (if applicable) and a copy of the W2G to the winning Patron. Have the Patron sign and date the audit copy of the W2G.

22. Remove EGM attendant card.

23. Then pay out the Jackpot to the Patron with a witness present. Ensure that the witness is visually verifying the payout. The witness shall be another EGM Attendant or a Security Team Member. If the Patron is uncomfortable accepting the Jackpot on the casino floor, the EGM attendant shall recommend the payout be completed in the Credit Host Office since there is already a security camera in place monitoring the office. Security and Surveillance must be notified if the Jackpot payout occurs in the Credit Host Office.

24. Have the witness sign, including badge number and date, the Hand Pay Voucher on the witnessing attendant/floor person line.

25. Ask the witness to insert their card and enter their PIN to witness the pay out through the system. Remove witness card.

26. Proceed to "key off" the EGM jackpot with the reset key and collect any receipts that come out of the TITO.

27. Verify all documents are complete prior to leaving the winning Patron. Proceed to the FJP room. Staple the completed documents together and place them in the clear Income Audit box next to the EGM workstations.

28. Where a promotional prize is displayed as the top Jackpot prize, see policy #1200.14.01, Promotional Prize Jackpot.

29. On progressive jackpots, EGM attendants will round up the jackpots to the nearest dollar amount only by approval from an EGM Supervisor or above.

30. If a tip is given, place the tip in the tip box next to the EGM workstations. (See policy #1200.03.01, EGM – Tokes)

PROCESSING JACKPOTS AT THE AUTOMATED JACKPOT MACHINE (AJM)

1. AJM 1, 2 and 2 ½ can only be used when the Jackpot is under $3,000.

2. If the Patron is requesting a check for all or any amount, the Jackpot must be processed at the Cage.

3. Prior to processing the jackpot in the system, the EGM Attendant must fill out the Jackpot Log (Pg. 17).

4. In the event that there is a discrepancy between the jackpot amount, as recognized by SMS, which is the on-line accounting system and the amount recorded by the EGM Attendant, do

not process at the AJM. Notify an EGM Supervisor or above. All overrides must be processed at the Cage.

5. Swipe your AJM card and enter your pin number to unlock AJM.

6. Swipe the system access card to access the SMS System. Enter password.

7. When logged in, the Jackpot will show up on the first screen. Click on Jackpot.

8. Input the following Patron information for the W2G processing:

    a. Name;

    b. Address;

    c. Social Security number;

    d. Government issued ID number and expiration; and

    e. Tax withholding amount if applicable.

9. After completing the W2G data, click "print". The W2G will print on the AJM printer.

10. The AJM will print a Hand Pay Voucher" (Pg. 26-27).

11. The AJM will provide the payout currency to the EGM Attendant at the AJM. The EGM Attendant will verify by counting the currency again prior to leaving the AJM. If there is a discrepancy, the EGM Attendant will hold the currency and immediately notify the EGM Supervisor or above. Follow the AJM payment dispute procedure.

12. After verifying the funds for the jackpot payout are correct, the EGM Attendant will follow the above payout steps #19 through #29 on pages 5-6.

PAYMENT DISPUTE AT AN AJM

1. The EGM Attendant will remain at the AJM and notify an EGM Supervisor or above.

2. The EGM Supervisor or above will meet the EGM Attendant at the AJM and verify the dispensed amount against the Jackpot Slip printed by the AJM. Upon verification of the dispensed amount, the EGM Supervisor will escort the EGM Attendant to the Cage.

3. While at the Cage, the EGM Supervisor will provide the dispensed amount and the Jackpot Slip printed by the AJM to the Cage Supervisor. The Cage Supervisor will receive the dispensed amount and the Jackpot Slip into inventory and notify Surveillance of the AJM

location and time of occurrence. The Cage Supervisor will complete a Cash/Coin Receipt form (Pg. 21) that will contain the following information:

a. Date;

b. Time;

c. Amount received;

d. Type of funds received (cash, coin);

e. Location of AJM that malfunctioned;

f. Reason for cash receipt;

g. Signature and Badge number of EGM Attendant; and

h. Signature and Badge number of Cage Supervisor and EGM Supervisor or above.

4. The EGM Supervisor or above will void the Jackpot Slip from the AJM and record the reason for the void. The EGM Supervisor or above will reissue a Jackpot Slip from the attendant's station and provide it to the Cage Supervisor for issuing funds to the EGM Attendant.

OVERRIDES (SMS INOPERABLE)

1. In the event that the on-line accounting system (SMS) is inoperable, it will be necessary to pay Jackpots and cancel credit amounts using a manually generated Hand Pay Voucher (pg. 26-27). This procedure also applies for any hand pay of $50 or more caused by a Patron cashing out and the EGM not connecting to the SMS.

2. Starter Tickets (pg. 11) will be used for the preparation of a manually generated Jackpot Slip.

3. See payout procedures #1 through #14 on pages 2-5.

4. The Jackpot, cancel credit or hand pay will not appear on the system.

5. EGM attendant will swipe their card and enter their pin number to access the SMS system.

   a. Click on Create New Entry.

   b. Change event type to Cancel Credit.

   c. Enter the Total Amount.

d. Select OK.

e. Click on Comment.

f. Select Machine not communicating from the list.

g. Select Print.

6. The system will then prompt for an EGM supervisor or above override.

    a. EGM supervisor will swipe their system card and enter their pin number.

    b. The hand pay voucher will print at the Cage.

7. #19 through #26 on pages 5-6 will then apply to complete the payout.

SYSTEM OFFLINE (SMS INOPERABLE)

1. In the event that the on-line accounting system (SMS) is inoperable, the System Offline Slip (Pg. 28) will be used to pay "cash outs" of up to $50.

2. For "cash outs" of more than $50, the Jackpot Request Form titled, "Starter Ticket" (pg. 11) will be utilized.

3. Each series of System Offline Slips shall be a two-part serially pre-numbered form. Blue ink ONLY will be used when completing the System Offline Slip. All slips shall be distributed to the EGM staff on duty by the EGM Supervisor or above when the system is down and the decision to utilize the slips is made by the EGM Shift Manager or above.

4. Complete a System Offline Form including the following information:

    a. Date/Time

    b. Shift

    c. Denomination of EGM

    d. EGM asset number and location

    e. Amount of payout (both alpha and numeric)

    f. Signature and badge number of preparer

    g. Signature and badge number of verifier

h. Coin(s) played

i. Line(s) played

j. Game Outcome (Winning Reel Combination)

5. When the System Offline Slip is complete, the credits are cleared, and the EGM is ready to play, the original copy of the System Offline Slip will be issued to the Patron. The System Offline Slip shall be redeemed by the Patron at the Cage window within 24 hours of the time of issuance.

6. A second verifier can be another EGM Attendant or above, casino hosts, players club reps, EGM technicians or a security department Team Member.

7. The EGM Attendant will continue to service the machines that need the System Offline Slips in an expedient manner to provide the best guest service. The EGM Attendant shall provide all department copies of the System Offline Slips to the EGM Shift Manager on duty at the FJP station in the Cage. At the conclusion of the system offline, the EGM Shift Manager will prepare a package for Income Audit Department which will include the tickets and a memo describing the system offline problem. This package will be deposited in the Income Audit box, which will be accessible by the members of the Income Audit Department only or be hand delivered to the Income Audit Department.

8. In the event the SMS is verified to be offline, QTGA must be notified immediately by the EGM Shift Supervisor or above.

DOWNSTREAM
CASINO RESORT

SLOT STARTER TICKET

☐ Jackpot Payout ☐ Cancel Credit

Date:				Time:		
Slot Machine Number				Shift Days Swing Grave		
Location Number				Booth Window Number		
DENOMINATION						
.01	.02	.05	.25	1.00	5.00	Other ______
No. Coins Played	No. Lines Played			Amt. Paid by Machine $		
WINNING REEL COMBINATION						
Amount of Payout $						
(PRINT AMOUNT - ALPHA)						
Slot Booth Cashier				License Number		
Slot Att./Tech.				License Number		
Slot Shift Supervisor				License Number		
Slot Shift Manager				License Number		
SECURITY				License Number		

SP 20048

PATRON INFORMATION - Please Print Clearly

Social Security # ☐☐☐ ☐☐ ☐☐☐☐

Social Security Name	Last	
	First	
	Mid	

Address-Street: ____________________

Street: ____________________

City: ____________________

State: ____________________ Zip: ____________

Status: U.S. Resident with Social Security Number and Picture ID ☐ ____% withholding

U.S. Resident without Social Security Number and Picture ID ☐ ____% withholding

Non Resident Alien - Country ☐ ____% withholding

Under penalties of perjury, I certify (i) This form is my correct tax identification number, and (ii) I am the recipient of winnings, and (iii) no other person is entitled to any portion of these winning, I understand that the information on this form will be used for W2-G reporting and withholding.

Patron Signature: ____________________ Date: ____________

Form **1042-S** Department of the Treasury Internal Revenue Service

Foreign Person's U.S. Source Income Subject to Withholding **2010** OMB No. 1545-0096

Copy B for Recipient

☐ AMENDED ☐ PRO-RATA BASIS REPORTING

1 Income code	2 Gross income	3 Withholding allowances	4 Net income	5 Tax rate / 6 Exemption code	7 Federal tax withheld / 8 Withholding by other agents / 9 Total withholding credit

10 Amount repaid to recipient	14 Recipient's U.S. TIN, if any ► ☐ SSN or ITIN ☐ EIN ☐ QI-EIN
11 Withholding agent's EIN ► ☐ EIN ☐ QI-EIN	15 Recipient's foreign tax identifying number, if any / 16 Country code
12a WITHHOLDING AGENT'S name	17 NQI's/FLOW-THROUGH ENTITY'S name / 18 Country code
12b Address (number and street)	19a NQI's/Entity's address (number and street)
12c Additional address line (room or suite no.)	19b Additional address line (room or suite no.)
12d City or town, province or state, country, ZIP or foreign postal code	19c City or town, province or state, country, ZIP or foreign postal code
13a RECIPIENT'S name / 13b Recipient code	20 NQI's/Entity's U.S. TIN, if any ►
13c Address (number and street)	21 PAYER'S name and TIN (if different from withholding agent's)
13d Additional address line (room or suite no.)	22 Recipient account number (optional)
13e City or town, province or state, country, ZIP or foreign postal code	23 State income tax withheld / 24 Payer's state tax no. / 25 Name of state

For Privacy Act and Paperwork Reduction Act Notice, see page 16 of the separate instructions. Cat. No. 11386R Form **1042-S** (2010)

Form **1042-S** Department of the Treasury Internal Revenue Service

Foreign Person's U.S. Source Income Subject to Withholding **2010** OMB No. 1545-0096

Copy A for Internal Revenue Service

☐ AMENDED ☐ PRO-RATA BASIS REPORTING

1 Income code	2 Gross income	3 Withholding allowances	4 Net income	5 Tax rate / 6 Exemption code	7 Federal tax withheld / 8 Withholding by other agents / 9 Total withholding credit

10 Amount repaid to recipient	14 Recipient's U.S. TIN, if any ► ☐ SSN or ITIN ☐ EIN ☐ QI-EIN
11 Withholding agent's EIN ► ☐ EIN ☐ QI-EIN	15 Recipient's foreign tax identifying number, if any / 16 Country code
12a WITHHOLDING AGENT'S name	17 NQI's/FLOW-THROUGH ENTITY'S name / 18 Country code
12b Address (number and street)	19a NQI's/Entity's address (number and street)
12c Additional address line (room or suite no.)	19b Additional address line (room or suite no.)
12d City or town, province or state, country, ZIP or foreign postal code	19c City or town, province or state, country, ZIP or foreign postal code
13a RECIPIENT'S name / 13b Recipient code	20 NQI's/Entity's U.S. TIN, if any ►
13c Address (number and street)	21 PAYER'S name and TIN (if different from withholding agent's)
13d Additional address line (room or suite no.)	22 Recipient account number (optional)
13e City or town, province or state, country, ZIP or foreign postal code	23 State income tax withheld / 24 Payer's state tax no. / 25 Name of state

For Privacy Act and Paperwork Reduction Act Notice, see page 16 of the separate instructions. Cat. No. 11386R Form **1042-S** (2010)

U.S. Income Tax Filing Requirements

Generally, every nonresident alien individual, nonresident alien fiduciary, and foreign corporation with United States income, including income that is effectively connected with the conduct of a trade or business in the United States, must file a United States income tax return. However, no return is required to be filed by a nonresident alien individual, nonresident alien fiduciary, or a foreign corporation if such person was not engaged in a trade or business in the United States at any time during the tax year and if the tax liability of such person was fully satisfied by the withholding of United States tax at the source. Corporations file Form 1120-F; all others file Form 1040NR (or Form 1040NR-EZ if eligible). You may get the return forms and instructions at any United States Embassy or consulate or by writing to: Internal Revenue Service, 1201 N. Mitsubishi Motorway, Bloomington, IL 61705-6613

En règle générale, tout étranger non-résident, tout organisme fidéicommissaire étranger non-résident et toute société étrangère percevant un revenu aux Etats-Unis, y compris tout revenu dérivé, en fait, du fonctionnement d'un commerce ou d'une affaire aux Etats-Unis, doit soumettre aux Etats-Unis, une déclaration d'impôt sur le revenu. Cependant aucune déclaration d'impôt sur le revenu n'est exigée d'un étranger non-résident, d'un organisme fidéicommissaire étranger non-résident, ou d'une société étrangère s'ils n'ont pris part à aucun commerce ou affaire aux Etats-Unis à aucun moment pendant l'année fiscale et si les impôts dont ils sont redevables, ont été entièrement acquittés par une retenue à la source, de leur montant. Les sociétés doivent faire leur déclaration d'impôt en remplissant le formulaire 1120-F; tous les autres redevables doivent remplir le formulaire 1040NR (ou 1040NR-EZ si éligible). On peut se procurer formulaires de déclarations d'impôts et instructions dans toutes les Ambassades et tous les Consulats des Etats-Unis. L'on peut également s'adresser pour tous renseignements à: Internal Revenue Service, 1201 N. Mitsubishi Motorway, Bloomington, IL 61705-6613

Por regla general, todo extranjero no residente, todo organismo fideicomisario extranjero no residente y toda sociedad anónima extranjera que reciba ingresos en los Estados Unidos, incluyendo ingresos relacionados con la conducción de un negocio o comercio dentro de los Estados Unidos, deberá presentar una declaración estadounidense de impuestos sobre ingreso. Sin embargo, no se requiere declaración alguna a un individuo extranjero, una sociedad anónima extranjera u organismo fideicomisario extranjero no residente, si tal persona no ha efectuado comercio o negocio en los Estados Unidos durante el año fiscal y si la responsabilidad con los impuestos de tal persona ha sido satisfecha plenamente mediante retencion del impuesto de los Estados Unidos en la fuente. Las sociedades anónimas envian la Forma 1120-F; todos los demás contribuyentes envian la Forma 1040NR (o la Forma 1040NR-EZ si le corresponde). Se podrán obtener formas e instrucciones en cualquier Embajada o Consulado de los Estados Unidos o escribiendo directamente a: Internal Revenue Service, 1201 N. Mitsubishi Motorway, Bloomington, IL 61705-6613

Im allgemeinen muss jede ausländische Einzelperson, jeder ausländische Bevollmächtigte und jede ausländische Gesellschaft mit Einkommen in den Vereinigten Staaten, einschliesslich des Einkommens, welches direkt mit der Ausübung von Handel oder Gewerbe innerhalb der Staaten verbunden ist, eine Einkommensteuererklärung der Vereinigten Staaten abgeben. Eine Erklärung, muss jedoch nicht von Ausländern, ausländischen Bevollmächtigten oder ausländischen Gesellschaften in den Vereinigten Staaten eingereicht werden, falls eine solche Person während des Steuerjahres kein Gewerbe oder Handel in den Vereinigten Staaten ausgeübt hat und die Steuerschuld durch Einbehaltung der Steuern der Vereinigten Staaten durch die Einkommensquelle abgegolten ist. Gesellschaften reichen den Vordruck 1120-F ein; alle anderen reichen das Formblatt 1040NR (oder wenn passend das Formblatt 1040NR-EZ) ein. Einkommensteuererklärungen und Instruktionen können bei den Botschaften und Konsulaten der Vereiningten Staaten eingeholt werden. Um weitere Informationen wende man sich bitte an: Internal Revenue Service, 1201 N. Mitsubishi Motorway, Bloomington, IL 61705-6613

Form **1042-S**

Department of the Treasury
Internal Revenue Service

Foreign Person's U.S. Source Income Subject to Withholding

2010

OMB No. 1545-0096

Copy C for Recipient

Attach to any Federal tax return you file

☐ **AMENDED** ☐ **PRO-RATA BASIS REPORTING**

1 Income code	**2** Gross income	**3** Withholding allowances	**4** Net income	**5** Tax rate **6** Exemption code	**7** Federal tax withheld **8** Withholding by other agents **9** Total withholding credit

10 Amount repaid to recipient	**14** Recipient's U.S. TIN, if any ► ☐ SSN or ITIN ☐ EIN ☐ QI-EIN
11 Withholding agent's EIN ► ☐ EIN ☐ QI-EIN	**15** Recipient's foreign tax identifying number, if any / **16** Country code
12a WITHHOLDING AGENT'S name	**17** NQI's/FLOW-THROUGH ENTITY'S name / **18** Country code
12b Address (number and street)	**19a** NQI's/Entity's address (number and street)
12c Additional address line (room or suite no.)	**19b** Additional address line (room or suite no.)
12d City or town, province or state, country, ZIP or foreign postal code	**19c** City or town, province or state, country, ZIP or foreign postal code
13a RECIPIENT'S name / **13b** Recipient code	**20** NQI's/Entity's U.S. TIN, if any ►
13c Address (number and street)	**21** PAYER'S name and TIN (if different from withholding agent's)
13d Additional address line (room or suite no.)	**22** Recipient account number (optional)
13e City or town, province or state, country, ZIP or foreign postal code	**23** State income tax withheld / **24** Payer's state tax no. / **25** Name of state

For Privacy Act and Paperwork Reduction Act Notice, see page 16 of the separate instructions. Cat. No. 11386R Form **1042-S** (2010)

Explanation of Codes

Box 1. Income code.

	Code	Types of Income
Interest	01	Interest paid by U.S. obligors—general
	02	Interest paid on real property mortgages
	03	Interest paid to controlling foreign corporations
	04	Interest paid by foreign corporations
	05	Interest on tax-free covenant bonds
	29	Deposit interest
	30	Original issue discount (OID)
	31	Short-term OID
	33	Substitute payment—interest
Dividend	06	Dividends paid by U.S. corporations—general
	07	Dividends qualifying for direct dividend rate
	08	Dividends paid by foreign corporations
	34	Substitute payment—dividends
Other	09	Capital gains
	10	Industrial royalties
	11	Motion picture or television copyright royalties
	12	Other royalties (for example, copyright, recording, publishing)
	13	Real property income and natural resources royalties
	14	Pensions, annuities, alimony, and/or insurance premiums
	15	Scholarship or fellowship grants
	16	Compensation for independent personal services[1]
	17	Compensation for dependent personal services[1]
	18	Compensation for teaching[1]
	19	Compensation during studying and training[1]
	20	Earnings as an artist or athlete[2]
	24	Real estate investment trust (REIT) distributions of capital gains
	25	Trust distributions subject to IRC section 1445
	26	Unsevered growing crops and timber distributions by a trust subject to IRC section 1445
	27	Publicly traded partnership distributions subject to IRC section 1446
	28	Gambling winnings[6]
	32	Notional principal contract income[3]
	35	Substitute payment—other
	36	Capital gains distributions
	37	Return of capital
	38	Eligible deferred compensation items subject to IRC section 877A(d)(1)
	39	Distributions from a nongrantor trust subject to IRC section 877A(f)(1)
	50	Other income

Box 6. Exemption code (applies if the tax rate entered in box 5 is 00.00).

Code	Authority for Exemption
01	Income effectively connected with a U.S. trade or business
02	Exempt under an Internal Revenue Code section (income other than portfolio interest)
03	Income is not from U.S. sources[4]
04	Exempt under tax treaty
05	Portfolio interest exempt under an Internal Revenue Code section
06	Qualified intermediary that assumes primary withholding responsibility
07	Withholding foreign partnership or withholding foreign trust
08	U.S. branch treated as a U.S. person
09	Qualified intermediary represents income is exempt

Box 13b. Recipient code.

Code	Type of Recipient
01	Individual[2]
02	Corporation[2]
03	Partnership other than withholding foreign partnership[2]
04	Withholding foreign partnership or withholding foreign trust
05	Trust
06	Government or international organization
07	Tax-exempt organization (IRC section 501(a))
08	Private foundation
09	Artist or athlete[2]
10	Estate
11	U.S. branch treated as U.S. person
12	Qualified intermediary
13	Private arrangement intermediary withholding rate pool—general[5]
14	Private arrangement intermediary withholding rate pool—exempt organizations[5]
15	Qualified intermediary withholding rate pool—general[5]
16	Qualified intermediary withholding rate pool—exempt organizations[5]
17	Authorized foreign agent
18	Public pension fund
20	Unknown recipient

[1] If compensation that otherwise would be covered under Income Codes 16–19 is directly attributable to the recipient's occupation as an artist or athlete, use Income Code 20 instead.
[2] If Income Code 20 is used, Recipient Code 09 (artist or athlete) should be used instead of Recipient Code 01 (individual), 02 (corporation), or 03 (partnership other than withholding foreign partnership).
[3] Use appropriate Interest Income Code for embedded interest in a notional principal contract.
[4] Non-U.S. source income received by a nonresident alien is not subject to U.S. tax. Use Exemption Code 03 when entering an amount for information reporting purposes only.
[5] May be used only by a qualified intermediary.
[6] Subject to 30% withholding rate unless the recipient is from one of the treaty countries listed under *Gambling winnings (Income Code 28)* in Pub. 515.

Form **1042-S** Department of the Treasury Internal Revenue Service

Foreign Person's U.S. Source Income Subject to Withholding

2010 OMB No. 1545-0096

Copy D for Recipient Attach to any state tax return you file

☐ AMENDED ☐ PRO-RATA BASIS REPORTING

1 Income code	2 Gross income	3 Withholding allowances	4 Net income	5 Tax rate / 6 Exemption code	7 Federal tax withheld / 8 Withholding by other agents / 9 Total withholding credit

10 Amount repaid to recipient	14 Recipient's U.S. TIN, if any ► ☐ SSN or ITIN ☐ EIN ☐ QI-EIN	
11 Withholding agent's EIN ► ☐ EIN ☐ QI-EIN	15 Recipient's foreign tax identifying number, if any	16 Country code
12a WITHHOLDING AGENT'S name	17 NQI's/FLOW-THROUGH ENTITY'S name	18 Country code
12b Address (number and street)	19a NQI's/Entity's address (number and street)	
12c Additional address line (room or suite no.)	19b Additional address line (room or suite no.)	
12d City or town, province or state, country, ZIP or foreign postal code	19c City or town, province or state, country, ZIP or foreign postal code	
13a RECIPIENT'S name / 13b Recipient code	20 NQI's/Entity's U.S. TIN, if any ►	
13c Address (number and street)	21 PAYER'S name and TIN (if different from withholding agent's)	
13d Additional address line (room or suite no.)	22 Recipient account number (optional)	
13e City or town, province or state, country, ZIP or foreign postal code	23 State income tax withheld / 24 Payer's state tax no.	25 Name of state

For Privacy Act and Paperwork Reduction Act Notice, see page 16 of the separate instructions. Cat. No. 11386R Form **1042-S** (2010)

Form **1042-S** Department of the Treasury Internal Revenue Service

Foreign Person's U.S. Source Income Subject to Withholding

2010 OMB No. 1545-0096

Copy E for Withholding Agent

☐ AMENDED ☐ PRO-RATA BASIS REPORTING

1 Income code	2 Gross income	3 Withholding allowances	4 Net income	5 Tax rate / 6 Exemption code	7 Federal tax withheld / 8 Withholding by other agents / 9 Total withholding credit

10 Amount repaid to recipient	14 Recipient's U.S. TIN, if any ► ☐ SSN or ITIN ☐ EIN ☐ QI-EIN	
11 Withholding agent's EIN ► ☐ EIN ☐ QI-EIN	15 Recipient's foreign tax identifying number, if any	16 Country code
12a WITHHOLDING AGENT'S name	17 NQI's/FLOW-THROUGH ENTITY'S name	18 Country code
12b Address (number and street)	19a NQI's/Entity's address (number and street)	
12c Additional address line (room or suite no.)	19b Additional address line (room or suite no.)	
12d City or town, province or state, country, ZIP or foreign postal code	19c City or town, province or state, country, ZIP or foreign postal code	
13a RECIPIENT'S name / 13b Recipient code	20 NQI's/Entity's U.S. TIN, if any ►	
13c Address (number and street)	21 PAYER'S name and TIN (if different from withholding agent's)	
13d Additional address line (room or suite no.)	22 Recipient account number (optional)	
13e City or town, province or state, country, ZIP or foreign postal code	23 State income tax withheld / 24 Payer's state tax no.	25 Name of state

For Privacy Act and Paperwork Reduction Act Notice, see page 16 of the separate instructions. Cat. No. 11386R Form **1042-S** (2010)

DOWNSTREAM CASINO RESORT

JACKPOT LOG

Business Date: ____________________________
(Business day is from 6:00am to 5:59am)

	Location	Machine #	Time	Jackpot Amount	Team Member Signature	TM#
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						

3232

☐ CORRECTED

PAYER'S name	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-0238
Street address	3 Type of wager	4 Date won	2010 **Form W-2G**
City, state, and ZIP code	5 Transaction	6 Race	**Certain Gambling Winnings**
Federal identification number Telephone number	7 Winnings from identical wagers	8 Cashier	
WINNER'S name	9 Winner's taxpayer identification no.	10 Window	For Privacy Act and Paperwork Reduction Act Notice, see the **2010 General Instructions for Certain Information Returns.**
Street address (including apt. no.)	11 First I.D.	12 Second I.D.	
City, state, and ZIP code	13 State/Payer's state identification no.	14 State income tax withheld	**File with Form 1096.**

Under penalties of perjury, I declare that, to the best of my knowledge and belief, the name, address, and taxpayer identification number that I have furnished correctly identify me as the recipient of this payment and any payments from identical wagers, and that no other person is entitled to any part of these payments.

Signature ► **Date ►**

Copy A
For Internal Revenue Service Center

Form **W-2G** Cat. No. 10138V Department of the Treasury - Internal Revenue Service

☐ CORRECTED

PAYER'S name, address, ZIP code, federal identification number, and telephone number	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-0238
	3 Type of wager	4 Date won	2010 **Form W-2G**
	5 Transaction	6 Race	**Certain Gambling Winnings**
	7 Winnings from identical wagers	8 Cashier	
WINNER'S name, address (including apt. no.), and ZIP code	9 Winner's taxpayer identification no.	10 Window	
	11 First I.D.	12 Second I.D.	**Copy 1**
	13 State/Payer's state identification no.	14 State income tax withheld	**For State Tax Department**

Under penalties of perjury, I declare that, to the best of my knowledge and belief, the name, address, and taxpayer identification number that I have furnished correctly identify me as the recipient of this payment and any payments from identical wagers, and that no other person is entitled to any part of these payments.

Signature ► **Date ►**

Form **W-2G** Department of the Treasury - Internal Revenue Service

☐ CORRECTED (if checked)

PAYER'S name, address, ZIP code, federal identification number, and telephone number	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-0238 2010 Form W-2G Certain Gambling Winnings
	3 Type of wager	4 Date won	
	5 Transaction	6 Race	
	7 Winnings from identical wagers	8 Cashier	
WINNER'S name, address (including apt. no.) and ZIP code	9 Winner's taxpayer identification no.	10 Window	This information is being furnished to the Internal Revenue Service.
	11 First I.D.	12 Second I.D.	
	13 State/Payer's state identification no.	14 State income tax withheld	**Copy B** **Report this income on your federal tax return. If this form shows federal income tax withheld in box 2, attach this copy to your return.**
Under penalties of perjury, I declare that, to the best of my knowledge and belief, the name, address, and taxpayer identification number that I have furnished correctly identify me as the recipient of this payment and any payments from identical wagers, and that no other person is entitled to any part of these payments. **Signature ►**		**Date ►**	

Form **W-2G** Department of the Treasury - Internal Revenue Service

☐ CORRECTED (if checked)

PAYER'S name, address, ZIP code, federal identification number, and telephone number	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-0238 2010 Form W-2G Certain Gambling Winnings
	3 Type of wager	4 Date won	
	5 Transaction	6 Race	
	7 Winnings from identical wagers	8 Cashier	
WINNER'S name, address (including apt. no.), and ZIP code	9 Winner's taxpayer identification no.	10 Window	This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
	11 First I.D.	12 Second I.D.	
	13 State/Payer's state identification no.	14 State income tax withheld	
Under penalties of perjury, I declare that, to the best of my knowledge and belief, the name, address, and taxpayer identification number that I have furnished correctly identify me as the recipient of this payment and any payments from identical wagers, and that no other person is entitled to any part of these payments. **Signature ►**		**Date ►**	**Copy C** **For Winner's Records**

Form **W-2G** Department of the Treasury - Internal Revenue Service

Instructions to Winner

Box 1. The payer must furnish a Form W-2G to you if you receive:

1. $1,200 or more in gambling winnings from bingo or slot machines;

2. $1,500 or more in proceeds (the amount of winnings minus the amount of the wager) from keno;

3. More than $5,000 in winnings (reduced by the wager or buy-in) from a poker tournament;

4. $600 or more in gambling winnings (except winnings from bingo, keno, slot machines, and poker tournaments) and the payout is at least 300 times the amount of the wager; or

5. Any other gambling winnings subject to federal income tax withholding.

Generally, report all gambling winnings on the "Other income" line of Form 1040. You can deduct gambling losses as an itemized deduction, but you cannot deduct more than your winnings. Keep an accurate record of your winnings and losses, and be able to prove those amounts with receipts, tickets, statements, or similar items that you have saved. For additional information, see Pub. 529, Miscellaneous Deductions; and Pub. 525, Taxable and Nontaxable Income.

Box 2. Any federal income tax withheld on these winnings is shown in this box. Federal income tax must be withheld at the rate of 25% on certain winnings less the wager.

Certain winnings that are not subject to 25% withholding may be subject to backup withholding at a 28% rate if you did not provide your federal identification number to the payer.

Include the amount shown in box 2 on your Form 1040 as federal income tax withheld. See Pub. 505, Tax Withholding and Estimated Tax, for additional information.

Signature. You must sign Form W-2G if you are the only person entitled to the winnings and the winnings are subject to regular gambling withholding. Return the signed form to the payer, who will give you your copies.

Other winners. Prepare Form 5754, Statement by Person(s) Receiving Gambling Winnings, if another person is entitled to any part of these winnings. Give Form 5754 to the payer, who will use Form 5754 to prepare Form W-2G for each person listed as a winner.

DOWNSTREAM
CASINO RESORT

CASH/COIN RECIEPT

Date:______________________________Time:________________

Amount $____________Type: Cash Coin Chips Other

TYPE: AJM / Found $ / Other

Location:________________________ Asset #________________

Reason:____

____

____

____

Returned by (Sig./Lic. #) ________________________________

Received by (Sig./Lic. #) ________________________________

White - Cage Yellow - Returned by Pink - Book

SP 20094

Form **W-9**
(Rev. October 2007)
Department of the Treasury
Internal Revenue Service

Request for Taxpayer Identification Number and Certification

Give form to the requester. Do not send to the IRS.

Print or type See **Specific Instructions** on page 2.

Name (as shown on your income tax return)

Business name, if different from above

Check appropriate box: ☐ Individual/Sole proprietor ☐ Corporation ☐ Partnership
☐ Limited liability company. Enter the tax classification (D=disregarded entity, C=corporation, P=partnership) ▶ ....
☐ Other (see instructions) ▶
☐ Exempt payee

Address (number, street, and apt. or suite no.)

Requester's name and address (optional)

City, state, and ZIP code

List account number(s) here (optional)

Part I **Taxpayer Identification Number (TIN)**

Enter your TIN in the appropriate box. The TIN provided must match the name given on Line 1 to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Social security number

or

Employer identification number

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

Part II **Certification**

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. See the instructions on page 4.

Sign Here **Signature of U.S. person ▶** **Date ▶**

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity,

- The U.S. grantor or other owner of a grantor trust and not the trust, and
- The U.S. trust (other than a grantor trust) and not the beneficiaries of the trust.

Foreign person. If you are a foreign person, do not use Form W-9. Instead, use the appropriate Form W-8 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

Nonresident alien who becomes a resident alien. Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

Example. Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity not subject to backup withholding, give the requester the appropriate completed Form W-8.

What is backup withholding? Persons making certain payments to you must under certain conditions withhold and pay to the IRS 28% of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester,
2. You do not certify your TIN when required (see the Part II instructions on page 3 for details),
3. The IRS tells the requester that you furnished an incorrect TIN,
4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or
5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See the instructions below and the separate Instructions for the Requester of Form W-9.

Also see *Special rules for partnerships* on page 1.

Penalties

Failure to furnish TIN. If you fail to furnish your correct TIN to a requester, you are subject to a penalty of $50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

Civil penalty for false information with respect to withholding. If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a $500 penalty.

Criminal penalty for falsifying information. Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

Misuse of TINs. If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

Specific Instructions

Name

If you are an individual, you must generally enter the name shown on your income tax return. However, if you have changed your last name, for instance, due to marriage without informing the Social Security Administration of the name change, enter your first name, the last name shown on your social security card, and your new last name.

If the account is in joint names, list first, and then circle, the name of the person or entity whose number you entered in Part I of the form.

Sole proprietor. Enter your individual name as shown on your income tax return on the "Name" line. You may enter your business, trade, or "doing business as (DBA)" name on the "Business name" line.

Limited liability company (LLC). Check the "Limited liability company" box only and enter the appropriate code for the tax classification ("D" for disregarded entity, "C" for corporation, "P" for partnership) in the space provided.

For a single-member LLC (including a foreign LLC with a domestic owner) that is disregarded as an entity separate from its owner under Regulations section 301.7701-3, enter the owner's name on the "Name" line. Enter the LLC's name on the "Business name" line.

For an LLC classified as a partnership or a corporation, enter the LLC's name on the "Name" line and any business, trade, or DBA name on the "Business name" line.

Other entities. Enter your business name as shown on required federal tax documents on the "Name" line. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on the "Business name" line.

Note. You are requested to check the appropriate box for your status (individual/sole proprietor, corporation, etc.).

Exempt Payee

If you are exempt from backup withholding, enter your name as described above and check the appropriate box for your status, then check the "Exempt payee" box in the line following the business name, sign and date the form.

Generally, individuals (including sole proprietors) are not exempt from backup withholding. Corporations are exempt from backup withholding for certain payments, such as interest and dividends.

Note. If you are exempt from backup withholding, you should still complete this form to avoid possible erroneous backup withholding.

The following payees are exempt from backup withholding:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2),

2. The United States or any of its agencies or instrumentalities,

3. A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities,

4. A foreign government or any of its political subdivisions, agencies, or instrumentalities, or

5. An international organization or any of its agencies or instrumentalities.

Other payees that may be exempt from backup withholding include:

6. A corporation,

7. A foreign central bank of issue,

8. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a possession of the United States,

9. A futures commission merchant registered with the Commodity Futures Trading Commission,

10. A real estate investment trust,

11. An entity registered at all times during the tax year under the Investment Company Act of 1940,

12. A common trust fund operated by a bank under section 584(a),

13. A financial institution,

14. A middleman known in the investment community as a nominee or custodian, or

15. A trust exempt from tax under section 664 or described in section 4947.

The chart below shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 15.

IF the payment is for . . .	**THEN the payment is exempt for . . .**
Interest and dividend payments	All exempt payees except for 9
Broker transactions	Exempt payees 1 through 13. Also, a person registered under the Investment Advisers Act of 1940 who regularly acts as a broker
Barter exchange transactions and patronage dividends	Exempt payees 1 through 5
Payments over $600 required to be reported and direct sales over $5,000[1]	Generally, exempt payees 1 through 7[2]

[1] See Form 1099-MISC, Miscellaneous Income, and its instructions.

[2] However, the following payments made to a corporation (including gross proceeds paid to an attorney under section 6045(f), even if the attorney is a corporation) and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, and payments for services paid by a federal executive agency.

Part I. Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-member LLC that is disregarded as an entity separate from its owner (see *Limited liability company (LLC)* on page 2), enter the owner's SSN (or EIN, if the owner has one). Do not enter the disregarded entity's EIN. If the LLC is classified as a corporation or partnership, enter the entity's EIN.

Note. See the chart on page 4 for further clarification of name and TIN combinations.

How to get a TIN. If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local Social Security Administration office or get this form online at *www.ssa.gov*. You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at *www.irs.gov/businesses* and clicking on Employer Identification Number (EIN) under Starting a Business. You can get Forms W-7 and SS-4 from the IRS by visiting *www.irs.gov* or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

Note. Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

Caution: *A disregarded domestic entity that has a foreign owner must use the appropriate Form W-8.*

Part II. Certification

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if items 1, 4, and 5 below indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). Exempt payees, see *Exempt Payee* on page 2.

Signature requirements. Complete the certification as indicated in 1 through 5 below.

1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983. You must give your correct TIN, but you do not have to sign the certification.

2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983. You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

3. Real estate transactions. You must sign the certification. You may cross out item 2 of the certification.

4. Other payments. You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions. You must give your correct TIN, but you do not have to sign the certification.

What Name and Number To Give the Requester

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account)	The actual owner of the account or, if combined funds, the first individual on the account [1]
3. Custodian account of a minor (Uniform Gift to Minors Act)	The minor [2]
4. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee [1]
b. So-called trust account that is not a legal or valid trust under state law	The actual owner [1]
5. Sole proprietorship or disregarded entity owned by an individual	The owner [3]
For this type of account:	**Give name and EIN of:**
6. Disregarded entity not owned by an individual	The owner
7. A valid trust, estate, or pension trust	Legal entity [4]
8. Corporate or LLC electing corporate status on Form 8832	The corporation
9. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
10. Partnership or multi-member LLC	The partnership
11. A broker or registered nominee	The broker or nominee
12. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity

[1] List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

[2] Circle the minor's name and furnish the minor's SSN.

[3] You must show your individual name and you may also enter your business or "DBA" name on the second name line. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

[4] List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.) Also see *Special rules for partnerships* on page 1.

Note. If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

Secure Your Tax Records from Identity Theft

Identity theft occurs when someone uses your personal information such as your name, social security number (SSN), or other identifying information, without your permission, to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN,
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax preparer.

Call the IRS at 1-800-829-1040 if you think your identity has been used inappropriately for tax purposes.

Victims of identity theft who are experiencing economic harm or a system problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 1-877-777-4778 or TTY/TDD 1-800-829-4059.

Protect yourself from suspicious emails or phishing schemes. Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to *phishing@irs.gov*. You may also report misuse of the IRS name, logo, or other IRS personal property to the Treasury Inspector General for Tax Administration at 1-800-366-4484. You can forward suspicious emails to the Federal Trade Commission at: *spam@uce.gov* or contact them at *www.consumer.gov/idtheft* or 1-877-IDTHEFT(438-4338).

Visit the IRS website at *www.irs.gov* to learn more about identity theft and how to reduce your risk.

Privacy Act Notice

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons who must file information returns with the IRS to report interest, dividends, and certain other income paid to you, mortgage interest you paid, the acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA, or Archer MSA or HSA. The IRS uses the numbers for identification purposes and to help verify the accuracy of your tax return. The IRS may also provide this information to the Department of Justice for civil and criminal litigation, and to cities, states, the District of Columbia, and U.S. possessions to carry out their tax laws. We may also disclose this information to other countries under a tax treaty, to federal and state agencies to enforce federal nontax criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism.

You must provide your TIN whether or not you are required to file a tax return. Payers must generally withhold 28% of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to a payer. Certain penalties may also apply.

Printed on recycled paper U.S. GOVERNMENT PRINTING OFFICE: 2007—339-891/60063

AJM

Hand Pay Voucher

DOWNSTREAM
CASINO RESORT

DATE ______________ VOUCHER # __________
[Manual Ticket]

TIME ______________

BOOTH ______________

Printer Test

W2-G ☐ 1042S ☐ [W2G]

TYPE ______________ AMOUNT ______________ ☐ W/H'S $ __________

LOCATION______________ ☐ PAY $ __________

MACHINE ______________ ALPHA ______________________________

DENOM ______________

SYMBOL ______________ COINS PLAYED__________ PAYMENT__________

PATRON ______________

______________ # ________ ______________ # ________
FLOORPERSON SLOT FLOOR MANAGEMENT

______________ # ________ ______________ # ________
CASHIER WITNESS

______________ # ________ ______________ # ________
WITNESSING ATTENDANT / FLOORPERSON PATRON

ACCOUNTING COPY

AJM

Hand Pay Voucher

DOWNSTREAM
CASINO RESORT

DATE ______________ VOUCHER # __________
[Manual Ticket]

TIME ______________

Printer Test

BOOTH ______________ [W2G]

W2-G ☐ 1042S ☐

TYPE ______________ AMOUNT ______________ ☐ W/H'S $ __________

LOCATION______________ ☐ PAY $ __________

MACHINE ______________ ALPHA ______________________________

DENOM ______________

SYMBOL ______________ COINS PLAYED __________ PAYMENT__________

PATRON ______________

______________ # ________ ______________ # ________
FLOORPERSON SLOT FLOOR MANAGEMENT

______________ # ________ ______________ # ________
CASHIER WITNESS

______________ # ________ ______________ # ________
WITNESSING ATTENDANT / FLOORPERSON PATRON

CAGE COPY SP 20131

FJP

Hand Pay Voucher

DOWNSTREAM CASINO RESORT

VOUCHER #

DATE

TIME

BOOTH

W2-G 1042S

TYPE AMOUNT ☐ W/H'S $

LOCATION ☐ PAY $

MACHINE ALPHA

DENOM

SYMBOL COINS PLAYED PAYMENT

PATRON

FLOORPERSON # SLOT FLOOR MANAGEMENT #

CASHIER # WITNESS #

WITNESSING ATTENDANT / FLOORPERSON # PATRON #

ACCOUNTING COPY

FJP

Hand Pay Voucher

DOWNSTREAM CASINO RESORT

VOUCHER #

DATE

TIME

BOOTH

W2-G 1042S

TYPE AMOUNT ☐ W/H'S $

LOCATION ☐ PAY $

MACHINE ALPHA

DENOM

SYMBOL COINS PLAYED PAYMENT

PATRON

FLOORPERSON # SLOT FLOOR MANAGEMENT #

CASHIER # WITNESS #

WITNESSING ATTENDANT / FLOORPERSON # PATRON #

CAGE COPY

SP 20210

DOWNSTREAM
CASINO RESORT

SYSTEM OFFLINE

1015

Date:				Time:		
Slot Machine Number:				Shift: Days	Swing	Grave
Location Number:				Booth Window Number:		
DENOMINATION						
.01	.02	.05	.25	1.00	5.00	Other______
WINNING REEL COMBINATION						
Amount of Payout $ - NOT VALID OVER $50 (Fifty dollars)						
(PRINT AMOUNT - ALPHA)						
Cashier				License Number		
Slot Att./Tech.				License Number		
Slot Shift Supervisor				License Number		
Slot Shift Manager				License Number		
Security				License Number		
Cage Supervisor				License Number		

** Not valid for more than 24 hours of issuance**

White-Guest Yellow-Audit Pink-Slots SP 20078

Emergency Operating Procedures	**Policy No:** **7400.05.01**	**Issue Date:** 7/26/2010 **Revised Date:** 11/23/2009 6/16/2010
PURPOSE: To establish comprehensive procedures in the event an emergency arises.		

DCR Compliance – ITEM Tracking	**Date**
Issue Date	7/26/2010
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

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 or his designee.

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, Senior Vice President of Resort Operations, 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. 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

PROCEDURE

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

Contents

EMERGENCY OPERATING PROCEDURES

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

Fire Protection

Quapaw Tribal Fire Department	Phone:	(918)-919-6075;
Quapaw, OK		(918)-919-6074
Reding's Mill	Phone:	(417)-624-2715
Fire Protection District Emergency	Fax:	(417)-624-1470
Reding's Mill, Mo		
Joplin Fire Department	Phone:	(417)-623-0403
303 east 3rd street		
Joplin, MO 64801		

Hospitals

St John's Regional Medical Center		
2727 S McClelland Blvd	Phone:	(417)-781-2727
Joplin, MO 64804		
Freeman Health System		
1102 W 32nd Street	Phone:	(417)-347-1111
Joplin, MO 64804	Email:	freemanhealth.com
Integris Baptist Regional Health Center		
200 2nd Ave SW	Phone:	(918)-542-6611
Miami, OK		

Sheriff's Department

Ottawa County Sheriff Office		
28 B SE	Phone:	(918)-542-2806
Miami, OK 74354	Fax:	(918)-542-3189
Cherokee County Sheriff Office		
915 E County Rd	Phone:	(620)-429-3992
Columbus, KS 66725	Fax:	(620)-429-1454
Newton County Sheriff Office		
208 W Coler	Phone:	(417)-451-8300
Neosho, MO 64850	Fax:	(417)-451-8352

Jasper County Sheriff Office	
405 E 5th Street	Phone: (417)-358-0426
Carthage, MO 64836	

JASCO 911 Center	
Emergency	Phone: (417)-624-1600
Non-Emergency	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

Joplin Police Department	Phone: (417)-623-3131
303 East 3rd Street	Ext: 405/420/421
Joplin, MO 64801	
Baxter Springs Police Department	Phone: (620)-856-2112
121 West 11th Street	
Baxter Springs, KS 66713	
Bureau of Indian Affairs	Phone: (918) 542-6921
Quapaw Tribal Marshalls	Phone: (918) 673-1709

Quapaw Tribe Environmental Department

5681 South 630 Rd.	Phone: (918) 542-1853
Quapaw, OK 74363	

Empire District Electric

Phone: (1-800-206-2300)

DOWNSTREAM CASINO RESORT

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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.

Type of Incident	Who to Notify
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

Title	Name	Office #	Cell #
1. General Manager	Steve Drewes	(918)919-6250	(918)919-9796
2. Senior VP of Resort Oper.	Tim Brown	(918)919-6051	(918)541-8938
3. Legal Counsel	Jack Brill		(417)626-0050
4. Security Director	Bill Goodwin	(918)919-6080	(918)919-9097
5. Manager of Security	Manager on Duty	(918)919-6081	(918)919-1218
6. Surveillance Director	Bill Cornell	(918)919-6280	(918)541-8734
7. Manager on Duty		(918)919-6202	(918)919-2542
8. Risk Manager	Linda Shipman	(918)919-6263	(918)919-9976
9. Director of Marketing	David Bren	(918)919-6216	
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. Director of EGMs	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. Director of Table Games	Carlos Broderman	(918)919-6052	(918)919-9457

(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

DOWNSTREAM
CASINO RESORT

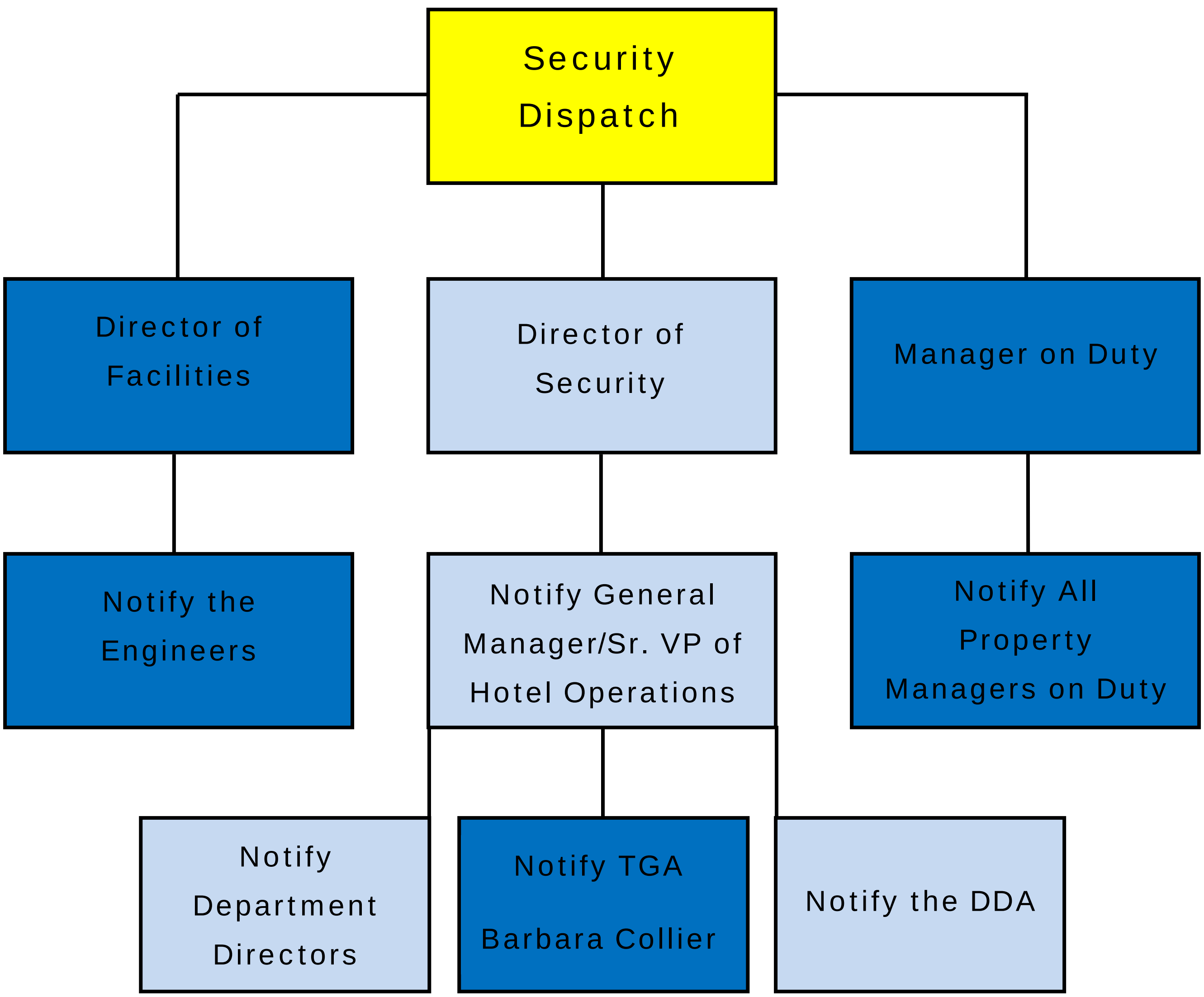
EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

HELICOPTER LANDING SITE FOR MEDICAL-EVACUATION or PATRON LANDING

N37°00.000'
W94°37.613"

DCR EMERGENCY NOTIFICATION DIAGRAM



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

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

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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

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 COMMANDER[1]
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

2. The person first encountering the incident should immediately contact Security Dispatch extension 6081 or 6082.

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:

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 Risk Manager 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, 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
EGM Department
Hotel
Players Club
Casino Legends Bar
Cashiers Cage
Facilities = large cabinet
Buffalo Grill = x3
Both Kitchens = large cabinets x5
Food Court + small cabinet
Executive Office Area
Wardrobe
Wa NA Bee DEA
EMT Room

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.

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:

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

1. Sound the alarm by using the pull station alarm. There are pull stations at every exit and throughout the facility.

2. Go immediately to the nearest telephone and call:

   a. Security Dispatch at: **(919)919-6081** and Surveillance at: **(919)919-6280**

   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. **NEVER YELL "FIRE!"**

5. If you can **SAFELY** return to the fire, and if you are trained, attempt to put out the fire using a fire extinguisher.

6. 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.

7. 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.

8. When Security, Facilities, or Quapaw Tribe Fire Department arrive on the scene, follow their instructions.

9. Do not talk to Media.

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 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, his designee, or the Director /Manager of

Security. In the absence of the Executive Team member, the order to evacuate will come from the Manager on Duty, after conferring with the Security Supervisor and Facilities Supervisor. If time and the emergency permit, the Manager on Duty will coordinate the evacuation with either the General Manager, Senior Vice President of Resort Operations, 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 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. Under certain circumstances, move to the North edge parking lot for further instructions from your supervisor/department head.

6. Each supervisor will supply the representative from Human Resources with a list of all personnel 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, Senior Vice President of Resort Operations, Public Relations Manager or the Director of Marketing.

SPECIFIC DEPARTMENT PROCEDURES/RESPONSIBILITIES

SECURITY

Security Dispatch Procedures

The Security Dispatcher will:

1. Receive both radio and telephone communication from the scene of the emergency.

2. Notify the Security Supervisor, Manager on Duty 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 B.I.A. Police Department 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 and/or Police Department 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.

    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, Senior Vice President of Resort Operations, Manager of Facilities, Director of 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 attendee's either in person or by some form of communication to advise of the location change.

2. The Senior VP/GM/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 6081 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.

1. 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 Manager of Security will take whatever action is appropriate to provide adequate staffing. If the Manager of Security 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.

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 Security is not available, report to 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 for 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.

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 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**
General Manager	Steve Drewes	(918)919-6250	(918)919-9796
SR VP Resort Operations	Tim Brown	(918)919-6051	(918)541-8938
Director of Security	Bill Goodwin	(918)919-6080	(918)919-9097
Risk Manager	Linda Shipman	(918)919-6263	(918)919-9976
Director of HR	Jani Cummings	(918)919-6230	(918)919-9795
Director of Construction	Ernie Caruthers	(918)919-6905	(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.

10. Upon completion of the evacuation from the concerned areas and the 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

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 Hotel will come from the Manager on Duty, after conferring with the Security 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, Senior Vice President Resort Operations 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 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.

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)919-9915 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 M.O.D. and 1 copy to Security.

5. Run 3 copies of the occupied rooms list (alphabetical order). Give one copy to the Hotel Manager, one copy to M.O.D. and one copy to Security.

6. Ensure that all sensitive papers are secured. Lock and secure door if applicable.

7. Team Members should move to the Valet parking lot, then locate and report to their supervisor.

EMERGENCY OPERATING PROCEDURES

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.

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.

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 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 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 Valet 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 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.

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, Senior Vice President Resort Operations or Director/Manager of Security.

2. The order to evacuate the Tribal Gaming Commission portion of the Administration Building will come from the Commission.

EMERGENCY OPERATING PROCEDURES

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.

5. Report to Finance Director 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 Director of EGMs and/or EGM shift supervisor to advise them all EGM Team Members are accounted for.

EGM Attendants

1. Lock and secure change cart in cage, if possible, and return the sensitive keys in the Key Watch cabinet.

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 if they cannot be returned to the Key Watcher cabinet.

TABLE GAMES

Manager/Supervisor

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

2. Ensure all funds are 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 if possible, and returned to the Key Watch cabinet.

6. Report to Director of Table Games (and/or next manager in line to them) that all Table Games Team Members are accounted for.

Dealers

1. 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.

2. Team Members should move to the Valet parking lot, then locate and report to their supervisor.

3. If a Team Member has sensitive keys, they should be turned over to the supervisor or manager.

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 Table Games Team Members if possible, and returned to the Key Watch cabinet.

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

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 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.

5. Ensure that all sensitive keys are collected from Team Members.

6. Report to Players Club 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.

POINTS TO REMEMBER IF/WHEN EVACUATION IS ORDERED

1. Never do anything to cause panic.

2. Listen for and heed instructions given by hotel/casino staff and Fire Department.

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 hotel 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.

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.

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 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.

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.

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

The General Manager or Senior Vice President of Resort Operations 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

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

Manager of Security's Responsibility

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

The return to occupancy of the building and reactivation of fire protection/detection system is the responsibility of the Quapaw Tribe Fire Department.

1. No post-fire operations will be investigated until approved by Quapaw Tribe Fire Department Chief.

2. 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 General Manager, Steven Drewes; Office/**(918)919-6250** Cell/ **(918)919-9796**.

3. After the insurance company has been notified and authorized on scene by the 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.

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.

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.

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 B.I.A. Police Department 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

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 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 Tribal Fire or B.I.A. arrival.

9. Upon Quapaw Fire or B.I.A. 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.

2. If a fire is located and the officer has been trained in the use of a fire extinguisher the 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 B.I.A. Police Department. Once the Quapaw Tribe Fire or B.I.A. Police Department 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

Panic Alarm Locations:

Unit ID		**Receiver 2 (Zone 3 & 4)**	ACTIVE
C1	Window 1 Cage	Receiver 2	Yes
C2	Window 2 Cage	Receiver 2	Yes
C3	Window 3 Cage	Receiver 2	Yes
C4	Window 4 Cage	Receiver 2	Yes
C5	Window 5 Cage	Receiver 2	Yes
C6	Window 6 Cage	Receiver 2	Yes
C7	Window 7 Cage	Receiver 2	Yes
C8	High Limit EGM Cage	Receiver 2	Yes
R1	Spring River POS	Receiver 2	Yes
R2	Wanabedae POS	Receiver 2	Yes
R3	Poker Room Cage Win 1	Receiver 2	Yes
C9	Poker Room Cage Win 2	Receiver 2	Yes
Pit 3	Receiver 2		Yes
Receiver 3 (Zone 1 & 2)			
Pit 1	Receiver 3		Yes
Pit2	Receiver 3		Yes
Hotel Front Reception	Receiver 3		Yes
Security Podium (1) Bus Lobby	Receiver 3		Yes
Security Podium (2) Hotel Lobby	Receiver 3		Yes
Receiver 4 (Zone B.O.H.)			
H.R	Receiver 4	Yes	
Executive Office	Receiver 4	No	
Devils Promenade 1	Receiver 4	Yes	
Devils Promenade 2	Receiver 4	No	
Legends	Receiver 4	No	
Security Podium (3)	Receiver 4	Yes	
Team Member Entrance		Yes	
Gift Shop POS		Yes	
Buffalo Grill POS		Yes	

DOWNSTREAM
CASINO RESORT

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

PANIC ALARMS

Surveillance Operator

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 officers are not on scene.

SECURITY

Security Dispatch

1. If advised that alarm is valid, the Dispatcher will call B.I.A. Police Department 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 B.I.A. Police be notified and then observe without interfering. Take any appropriate actions necessary to protect guests and Team Members until B.I.A.'s arrival.

4. Upon B.I.A.'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.

Security

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

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.

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.

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.

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. Hotel, All Floors: First through Twelve (1-12)
   b. Hallways
   c. Stairwells
   d. Main Elevators

4. **AREA 4 - Kitchen Areas** - Search Team Coordinator – On Duty Chef or Assistant
   a. Hallways, Pantry, 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
    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

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 from the ground.

If NO device is located: Security Supervisor will contact either the 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 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.

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, Senior Vice President of Resort Operations, 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 emergency permit, the Manager on Duty will coordinate the evacuation with either the General Manager, Senior Vice President Resort Operations, 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 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 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 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 M.O.D. 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 M.O.D. and one copy to Security.

3. Ensure that all sensitive papers are secured. Lock and secure door if applicable.

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.

EMERGENCY OPERATING PROCEDURES

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 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.

ADMINISTRATION BUILDING EVACUATION

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

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 Finance Director 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.

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 Director of EGMs 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.

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 Director of Table Games (and/or next manager in line to them), that all Team Members are accounted for.

Dealers

1. 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.

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

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

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:

4. 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.

5. All Team Member areas will be double-checked to make certain they are completely evacuated.

6. All maintenance department areas, hallways, stairwells, linen rooms, housekeeping section and roof areas will be double-checked to make certain they are completely evacuated.

7. 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 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.

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 Players Club 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, Senior Vice President of Resort Operations, Manager of Facilities, Director of 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.

2. The Senior VP/GM/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 6081 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.

EMERGENCY OPERATING PROCEDURES

Security Manager

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/Manager of Security to advise them of members accounted for. If the Director/Manager Security is not available, report to 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.

2. Officers will make every effort to keep fire doors between stairways and floors closed for 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.
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 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.

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

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.

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: _____

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 (**6081**).
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.

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.
6. Do not allow anyone who may have touched the envelope to leave the office.
7. When emergency responders arrive, they will provide further instruction on what to do.

8. 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.

Procedures for Handling Suspicious Mail

When a suspicious piece of mail is discovered, you must take the following actions:

1. Once the mail piece, package or letter, has been identified as a suspicious or contaminated mail piece, do not handle the letter or package.

2. Call Security Dispatch at **6081**.

3. Notify your supervisor or manager immediately.

4. 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.

5. 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.

6. 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.

7. Emergency response personnel will provide instruction from this point.

8. 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.

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 Manager on Duty or Security Supervisor will make the determination when to call B.I.A. Police. 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.

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 B.I.A Police Department 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 as soon as possible. A complete damage report will be submitted to the 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 within 7 days of the debriefing.

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 i**ndoors**, 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 **outdoor**s, 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.

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 ¾ 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:

    b. Security Supervisor

    c. Manager on Duty

    d. 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.

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

TORNADO WARNING

1. If in-house shelter is ordered, the security dispatcher is to read on the intercom the following:

2. "This is an emergency alert. Listen for instructions"

3. Followed by:

   "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:

General Manager	Steve Drewes	(918)919-9796
SR VP Resort Operations	Tim Brown	(918)919-6051
The Director/Manager of Security	Bill Goodwin	(918)919-9097

2. In the absence of an Executive Team Member, the order for emergency in-place sheltering will be given by 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.

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 hotel

    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.

EMERGENCY OPERATING PROCEDURES

Hotel

1. 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. Hotel Front Desk Team Members:

    b. Run a list of occupied rooms by number and one by alphabetical order.

    c. Ensure that all sensitive papers are secured.

    d. 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 –

    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

All casino patrons and Team Members may be directed to any restaurant, outlet or restroom surrounding the casino floor, or be moved to the hotel stairwells as time and occupancy levels allow for in-house sheltering.

1. Table Games – Ensure that all funds have been secured and the covers are locked on the tables.

2. 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.

3. 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.

4. EGM Department – Ensure that all funds have been secured.

Restaurants

Restaurant Team Members –

1. Turn off all stoves and/or electrical equipment.

2. Go to the Red Oak Steak House and turn over sensitive keys to your supervisor or manager.

Handicapped Guests

If there is time once the tornado alarm has gone off, 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.

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 Supervisor		(918)919-6081
Manager on Duty		(918)919-2542
General Manager	Steve Drewes	(918)919-6250
QTGA Compliance Manager		(918)919-6032
Risk Manager	Linda Shipman	(918)919-9976

2. The Security 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 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 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 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 within 7 days of the debriefing. The Director/Manager 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.

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.

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 as soon as possible. A complete damage report will be submitted to the General Manager within 14 days of the incident.

EMERGENCY OPERATING PROCEDURES

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, VP of Resort Operations, 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.

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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.

WHO	EXTENSION	CELL/ALTERNATE#
Executive:		
Steve Drewes, GM	6250	(918)919-9796
Tim Brown, Sr. VP of Resort Ops	6051	(918)541-8938
Security:		
Bill Goodwin, Director	6078, 6080, 6081	(918)919-9097
Finance:		
Kent Jones, CFO	6050	(918)541-8939
Casey Riddle, Director	6278	(918)919-6462
Human Resources:		
Jani Cummings	6230	(918)919-9795
I.T.:		
Dave Clark, Director	6295	(918)541-8746
Marketing:		
David Bren, Director	6216	(918)919-6104
Hotel:		
Bob Bergquist, Director	6150	(918)919-9794
Poker:		
Elliot Schecter, Manager	6229	(918)919-9324

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

Purchasing:

Jerri Montgomery, Purchasing Mgr.	6244	(918)801-3221
Tim Montgomery, Whse MGR	6245	(918)919-9809
Wardrobe (West Warehouse)	6157	
EVS/Housekeeping:		
Linda Starkebaum	6151	(918)919-9814
Facilities/Construction:		
Ernie Caruthers, Director	6905	(918)541-8731
Valet/Guest Services:		
Troy Harvey, MGR	6152	(918)919-9915
EGMs:		
Bob Moritz, Director	6090	(918)541-4497
Surveillance:		
Bill Cornell, Director	6280	(918)541-8734
Table Games:		
Carlos Broderman, Director	6132	(918)919-9457
PBX	6001, 6012, 6000	

CHAPTER 9 - POWER OUTAGES

POWER FAILURE

1. The backup generator should automatically restore temporary power to limited areas of the Casino, Hotel 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.

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 6081of 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 EGM personnel.
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.

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 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

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.

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

*G*AS 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.

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:** Primary assembly point is; 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 in the far Southeast corner very plainly Marked as the “Main Gas shut off”.

CHAPTER 11 - HAZARDOUS MATERIALS

HAZARDOUS SPILLS

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

CHAPTER 12 - INTRUDER, TRESPASSER, VANDALISM

INTRUDER/TRESPASSER

If you see a suspicious stranger in the building:

1. Contact Security at **6081**.

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 police 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.

CHAPTER 13 - ASSAULT

1. Call Security Dispatch at extension **6081** 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.

CHAPTER 14 - WEAPON IN THE BUILDING

WEAPON IN THE BUILDING

1. This procedure is for simple **POSSESSION** only, by other than law enforcement 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 **6081** 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

    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.**

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: **6081** 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 <u>if the room you are in can be locked</u> and if so, close and lock all the windows and doors, and turn off all the lights.

1. If possible, get everyone down on the floor and ensure that no one is visible from outside the room.

2. One person in the room should call Security Dispatch at: **6081** and advise the dispatcher of what is taking place. Inform him/her of your location.

3. 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.

4. 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.

5. 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: **6081** 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.

1. 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.

2. 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.

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

What to expect from responding police officers:

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.

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.**

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.

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 he tells 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

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 **6081** 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, Senior Vice President of Resort Operations, 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:

   a. Surveillance – Who will try to obtain vehicle description, license plate number and video of anything related to the incident.

b. B.I.A

c. Other Law Enforcement Agencies

d. General Manager/Senior Vice President of Resort Operations

e. Risk Manager

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 and the Risk Manager.

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 Supervisor. The Security Supervisor will ensure that the following are notified:

    a. B.I.A

    b. General Manager

    c. Security Director/Manager

3. The person receiving the threat will immediately complete an Extortion/Kidnap report. Located on next page.

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)

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

Background Sounds: (Check all that apply)

( ) Street Noises ( ) Machinery ( ) Animal Noises ( ) Voices
( ) PA System ( ) House Noises ( ) Crying ( ) Motor
( ) Clear ( ) Static ( ) Children
( ) Long Distance ( ) Local ( ) Pay Phone

Threat Language: (Check all that apply)

( ) Well Educated ( ) Incoherent ( ) Foul
( ) Taped ( ) 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: ____

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.

1. Notify Security Dispatch immediately at extension **6081**. Advise them if the suspect is alone or with someone. Try to obtain the suspect's name.

2. 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.

3. DO NOT contact Family Members, Clergy or Friends.

Security Dispatch

1. Security Dispatch will notify:

    a. The Security Supervisor

    b. B.I.A.

    c. Surveillance

d. QTGA Compliance Agent

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 **6081**.

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.

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. B.I.A

    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.

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 **6081**. Security will then:

1. Clear other Team Members from the area.
2. Secure the area until the police arrive. Do not move person or any evidence if this may be a crime scene.
3. Notify the 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.

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

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.

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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 worker's benefits claim for all workplace injuries meeting TWB guidelines.

3. Approve prescription purchases and forward medical approvals to the insurance company.

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 Supervisor's 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.

Risk Manager's Responsibilities

1. Notify the Tribal Gaming Authority, CFO, and 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 QTGA, CFO, and 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 that 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.

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.

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

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

DOWNSTREAM CASINO RESORT

EMERGENCY OPERATING PROCEDURES

Revised 6/16/2010

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

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

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

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.

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.

EMERGENCY OPERATING PROCEDURES

RESPONSIBILITIES

General Manager

The 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.

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 Casino/Resort.

SITE AND EQUIPMENT DESCRIPTIONS

Site Overview

The Downstream Casino Resort is located at 6900 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.

A. 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.

   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 (Etylene 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.

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.

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

- Prepare standard operating procedures for fuel delivery operations, emergency equipment shutdowns, and emergency response team action using spill kits.
- Review and update fuel spill-related operating procedures annually.
- Place emergency response team standard operating procedures with the spill kits located near the ASTs.
- 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.

EMERGENCY OPERATING PROCEDURES

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

- Place spill response kits near all chemical/petroleum product storage areas along with copies of all applicable MSDS sheets.

- Prepare standard operating procedures for chemical/petroleum product delivery operations and emergency response team action using spill kits.

- Review and update fuel spill-related operating procedures annually, and when site conditions related to chemical/petroleum product storage and use change substantially.

- 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.

- 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.

SPILLS/LEAKING CONTAINERS

15. 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:

    i. **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.

    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.

    ii. **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.**

16. 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.

SPILL RESPONSE

1. 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 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.
- ❑ 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: <u>VALET PARKING LOT</u>**
  - ❑ **SECONDARY: <u>NORTH EDGE OF MAIN PARKING LOT</u>**

  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

- The Floor Monitors telling employees that the "In-place-shelter procedure" is in effect shall make an announcement.
- 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.
- The on-duty Facility Manager (or his/her designee) will set all ventilation systems to 100 percent re-circulation so that no outside air is drawn into the structure. Where this is not possible, ventilation systems should be turned off.
- The on-duty Facility Manager (or his/her designee) will also, turn off all heating systems and air-conditioners.
- 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.
- The on-site Risk Manager will post warning signs at entrance.

FIRE/EXPLOSIONS

17. 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.

18. Give your name, location, telephone number and a brief explanation of the problem.

19. IF THE FIRE CAN BE SAFELY FOUGHT WITH A PORTABLE EXTINGUISHER, DO SO. IF IN DOUBT, LEAVE THE AREA IMMEDIATELY.

20. 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.

21. 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.

22. 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:

A. **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:

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

2. Date, time, and type of incident;

3. Name, and quantity of material(s) involved;
4. The extent of injuries, if any;
5. An assessment of actual or potential hazards to human health or the environment, where applicable;
6. Estimated quantity and disposition of recovered material that resulted from the incident;
7. Steps taken to prevent a recurrence of the incident; and
8. 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 employees 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:

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

PLAN REVIEW

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

ENTERING AND LEAVING THE MANTRAP AREA OF THE CAGE	Policy No: 1400.56.02	Issue Date: 8/9/2010
PURPOSE: To establish procedures for entering and leaving the mantrap area of the cage.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
Compliance Review	12/9/2009
QTGA Submission	1/14/2010
QTGA Return	1/21/2010
Compliance Review	4/13/2010
QTGA Submission	4/15/2010
QTGA Return	4/22/2010
Compliance Review	5/12/2010
QTGA Submission	5/13/2010
QTGA Return	5/27/2010
Compliance Review	6/2/2010
QTGA Submission	6/3/2010
QTGA Final Approval	6/24/2010
GM Approval	6/3/2010
DDA Final Approval	7/7/2010
Compliance Revision to DDA Approval	7/20/2010
QTGA Submission	7/22/2010
QTGA Return	8/2/2010
Compliance Review	8/4/2010
QTGA Submission	8/5/2010
QTGA Final Approval	8/9/2010
GM Approval	8/5/2010
DDA Final Approval	8/12/2010

PROCEDURES

Surveillance

1. A Team Member that has access to the mantrap area shall scan their badge in order for the door to the mantrap area to open. (A list of Team Member positions that are authorized to enter the mantrap area are provided on page 5-6.) Each Team Member that has access to the mantrap area and enters the door to the mantrap area shall scan their badge, even if the door is already open so there is evidence of each authorized Team Member entering the mantrap area.

2. Once the initial door to the mantrap area is closed, the Team Member shall push the green button located on the far side of the wall near the door closest to the cage area. The green button notifies surveillance by activating an alarm monitor once it is pushed.

3. Surveillance shall identify the Team Member (s) requesting access to the Cage area and ensure they are authorized to enter.

4. If a Team Member is escorting a non-key licensed individual that would normally not be allowed in the secured area, Surveillance will verify that an approved Secured Access Request (pg. 7) has been received from QTGA (Quapaw Tribal Gaming Agency) authorizing the non-key licensed individual to enter the Cage area.

5. Once the Secured Access Request is verified, surveillance shall release the door and the Team Member(s) and individual(s) shall enter the Cage area.

6. Team Members that do not have access to the mantrap area but are key licensed shall be escorted by Security through the mantrap. The non authorized Team Members shall not scan their badge. Security shall escort the Team Member into the mantrap, call Surveillance to report who they are escorting, where they are going and the reason. Surveillance shall log this information as documentation as to who is entering the mantrap area.

7. Surveillance shall verify the Soft Count mantrap door is secured prior to authorizing access into the Cage area.

8. All Team Members that have authorized access to enter the mantrap and Cage shall scan their badge on all subsequent badge readers so there is documented evidence of all who enters the mantrap and Cage areas.

Procedures for Obtaining a Secured Access Request

1. The Department Manager or above shall request a Secured Access Request be prepared by the DCR Compliance Department. The Secured Access Request is to request approval from QTGA for the non-authorized individual to enter an authorized area.

2. The Secured Access Request contains the following information:

    a. Date

    b. Time

    c. Work to be performed

    d. Name and Badge Number for access

    e. Access Area and Yes/No for each area

    f. DCR Compliance Authorization Signature and Date

    g. Requesting Department Authorization Signature and Date

    h. QTGA Authorization Signature and Date

3. An authorized DCR Compliance Representative (Compliance Manager, Compliance Officer, Compliance Coordinator, Director of Finance, CFO, or General Manager) shall sign the Secured Access Request, indicating approval.

4. Once the Secured Access Request is completed and signed by the DCR Compliance Department, it is provided to the requesting Department Supervisor or above for signature.

5. DCR Compliance shall provide the signed Secured Access Request to QTGA for approval.

6. QTGA will also sign the Secured Access Request indicating approval.

7. DCR Compliance will take the QTGA approved Secured Access Request to get a date stamp from both Security and Surveillance. Once the date stamps are provided, copies of the Secured Access Request are made and given to both Security and Surveillance.

8. DCR Compliance shall also provide a copy of the approved Secured Access Request to the Department requesting access and QTGA.

9. The original copy of the Secured Access Request shall be maintained by DCR Compliance.

<u>Security</u>

1. The Security department will assist in controlling the exiting door of the mantrap to the DCR back of house hallway.

2. When a Team Member is leaving the mantrap, the Team Member will push the green button located near the door closest to the Team Member hallway.

3. This will activate the alarm monitor in the security dispatch.

4. If the Team Member is not carrying items out of the mantrap, security will release the door.

5. If the Team Member is carrying any type of package or item that could conceal items, security will dispatch an officer to do a bag or garment check. The door will remain locked until an officer is available to complete the bag or garment check.

Man Trap	**Main Bank**	**Cashier Counter**	**Poker Cage**	**High Limit Cage**
CFO	Accounting Manager	Accounting Manager	Accounting Manager	Accounting Manager
Cage Cashier	Admin Assistant	Admin Assistant	Admin Assistant	Admin Assistant
Cage Manager	CFO	CFO	CFO	CFO
Cage Shift Manager	Cage Cashier	Cage Cashier	Cage Cashier	Cage Cashier
Cage Supervisor	Cage Manager	Cage Manager	Cage Manager	Cage Manager
Cage Trainer	Cage Shift Manager	Cage Shift Manager	Cage Shift Manager	Cage Shift Manager
DCR Compliance Manager, Officer, Coordinator	Cage Supervisor	Cage Supervisor	Cage Supervisor	Cage Supervisor
Count Team Clerk	Cage Trainer	Cage Trainer	Cage Trainer	Cage Trainer
Count Team Manager	DCR Compliance Manager; Officer; Coordinator	DCR Compliance Manager; Officer, Coordinator	DCR Compliance Manager; Officer; Coordinator	DCR Compliance Manager; Officer; Coordinator
Count Team Supervisor	Director of Finance	Director of Finance	Director of Finance	Director of Finance
Count Team Lead Clerk	Director of Security	Director of Security	Director of Security	Director of Security
Director of Finance	EMT/Security	EMT/Security	EMT/Security	EMT/Security
Director of Security	General Manager	General Manager	General Manager	General Manager
EMT/Security	Investigator	Income Audit Manager	Income Audit Manager	Income Audit Manager
General Manager	Main Bank Cashier	Income Audit Supervisor	Income Audit Supervisor	Income Audit Supervisor
Income Audit Manager	Security F/R	Income Auditor	Income Auditor	Income Auditor
Income Audit Supervisor	Security Lead	Investigator	Investigator	Investigator
Income Auditor	Security Officer	Lead Income Auditor	Lead Income Auditor	Lead Income Auditor
Investigator	Security Shift Manager	Main Bank Cashier	Main Bank Cashier	Main Bank Cashier
Lead Income Auditor	Security Shift Supervisor	Security F/R	Security F/R	Security F/R
Main Bank	Security	Security Lead	Security Lead	Security Lead

Cashier	Supervisor			
Security F/R	QTGA	Security Officer	Security Officer	Security Officer
Security Lead	Director of Surveillance	Security Shift Manager	Security Shift Manager	Security Shift Manager
Security Officer		Security Shift Supervisor	Security Shift Supervisor	Security Shift Supervisor
Security Shift Manager		Security Supervisor	Security Supervisor	Security Supervisor
Security Shift Supervisor		QTGA	QTGA	QTGA
Security Supervisor		Director of Surveillance	Director of Surveillance	Director of Surveillance
QTGA				
Director of Surveillance				

Quapaw Tribal Gaming Agency

Secured Access Request

Date: ______________________ **Time:** ______________________

Work to be performed:
Name and Badge # for access:

Access Area	**Yes**	**No**
Cage		
Poker Cage		
High Limit Cage		
Main Bank		
Pit Access #___		
Count Room (In progress)		
Count Room (Not in progress)		
Server Room		
IDF #___		
Surveillance		

DCR Compliance Authorization
Signature:______________________ **Date:**______________

Requesting Department Authorization
Signature:______________________ **Date:**______________

QTGA Authorization
Signature:______________________ **Date:**______________

QTGA Approved 3/23/2010

EZ-PAY" FIND" TICKET FUNCTION	Policy No: 1400.17.01	Issue Date: 8/10/2010
PURPOSE: To establish policies and procedures that outlines how Cage Supervisors are to process the "Find" ticket function in the EZ-Pay system and maintain accountability for the funds of Downstream Casino Resort (DCR).		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/10/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/21/2010
Compliance Review	7/28/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/10/2010
DDA Final Approval	8/12/2010

POLICY

Ticketed gaming machines can fail to print a valid ticket for a patron. In this situation, the Electronic Gaming Machine (EGM) Supervisor or above will come to the Cage with the last four numbers of the ticket, the EGM number, and the ticket amount.

PROCEDURE

The Cage Supervisor will:

1. On the Tickets menu, click "DAMAGED" then "FIND".

2. The Cage Supervisor will be prompted to enter her/his name and password. The Cage Supervisor will:

    a. Type in the last four of the validation number.

    b. Type in the EGM number.

    c. Type in the date.

    d. Type in the total amount of the ticket.

e. Click enter.

3. If the last four numbers are correct and the EGM number is correct, the ticket's complete validation code will appear. The Cage Supervisor will write the complete number on the ticket.

4. The Supervisor will click "Pay" and the ticket is paid as part of the Cage Cashier's session.

5. NOTE: If the last four numbers of the ticket and/or the EGM number are incorrect, the ticket cannot be redeemed in the system. The EGM department will need to re-investigate and find the correct information.

6. When the Cage Cashier is ready to close the session, this ticket will need to be hand keyed into the ticket tally report. (If for whatever reason the wrong numbers were written down on the ticket, the Cage Cashier will simply add this ticket amount to the ticket tally total amount to get the correct session closure amount.)

Food and Beverage Variance and Paperwork Policy	**Policy No:** 3000.02.01	**Issue Date:** 7/23/2010 **Revised Date:** 5/27/2010 6/11/2010
PURPOSE: To establish a food and beverage policy for the eating establishments at Downstream Casino Resort.		

DCR Compliance – ITEM Tracking	**Date**
Issue Date	7/23/2010
Compliance Review	5/27/2010
QTGA Submission	6/3/2010
QTGA Return	6/10/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Final Approval	7/23/2010
GM Approval	7/22/2010
DDA Final Approval	8/12/2010

POLICY

1. Corrective action for variances over $5 for the Red Oak Steakhouse or over $15 for the Buffalo Grille, Spring River, and Wa Na Bee Dea, and incomplete paperwork or missing paperwork for any of the eating establishments will be as follows:

Occurrences Within a 12 Month Period	**Progressive Discipline**
1	Verbal warning
2	Written warning (next coaching level)
3	Final warning (next coaching level) and 3 day suspension
4	Termination

2. Downstream Casino Resort (DCR) funds, documents, paperwork and property handled improperly or incompletely will result in progressive discipline beginning with a written warning for each type of infraction. If a variance occurs as a result, a variance discipline will also be issued for the following:

   a. Failure to secure DCR funds, property or assets

   b. Failure to obtain or ensure signatures on documents, including but not limited to compensation slips and credit card receipts

            i. All merchant copies of credit card receipts must be signed by the card holder. Failure to do so can lead to a reversal of the entire charge, including tip and progressive discipline. This will also result in a variance.

    c. Failure to verify paperwork or reports accurately

3. Corrective action for failure to secure DCR funds, assets and paperwork will be as follows:

Occurrences Within a 12 Month Period	**Progressive Discipline**
1	Written warning
2	Written warning (next coaching level)
3	Final warning (next coaching level) – 1 day suspension
4	Termination

4. Corrective action may be adjusted depending on the severity of the infraction. A Team Member file may be reviewed at any time. Variances which appear to be problematic may be disciplined further at Management's discretion.

5. If facts and/or evidence indicate that a Team Member has removed DCR assets illegally or has not taken the appropriate steps to safeguard these assets, the Team Member may be placed on an investigative suspension until the facts and/or evidence can be reviewed by the Manager on duty and surveillance. Once reviewed, a decision will be rendered on the status of the Team Member's standing with DCR, up to and including termination.

6. For any overages or shortages of $100 or more in a given cashier's drawer or bank, the following must be completed by a shift supervisor or above: (Note: If it is 100% positive that there is an offsetting variance elsewhere in the department, steps 2-6 are not necessary.)

    a. Income Audit will issue a variance exception and deliver to the Restaurant Operations Manager and/or the Team Member's direct Manager.

    b. The Restaurant Operations Manager and/or the Team Member's direct Manager will request video from surveillance of the shift in question.

    c. Obtain written statements from the Team Member, surveillance and Team Member's Manager after reviewing the video.

    d. Complete and issue a corrective action pending the outcome of the investigation. A corrective action must be issued within 5 calendar days barring uncontrollable circumstances.

Quapaw Tribal Gaming Agency

Date Received	8/6/10
Comments	
Reviewed By	8/9/10
Approved	Tentative
Not Approved	Final

Policy and Procedure Submission

Policy Name and Number:	*Department:*	*Submission Date:* 8/5/2010
Gift Card Procedures *Policy #1400.15.01*	Cage	
Narrative Description: To establish policy and procedures for Cage Cashiers to issue and redeem Gift Cards. This is a revised version based on QTGA's comments provided to us on 7/28/2010.		*DCR/QTGA Tracking:*

DCR Compliance Authorization

Signature: Stephanie Bott 2551 **Date:** 8/3/10

Department Director Authorization

Signature: #1945 **Date:** 8/3/10

General Manager Authorization

Signature: **Date:** 8/5/10

QTGA Authorization

Signature: Barbara Collins **Date:** 8/9/10

Gift Card Procedures	Policy No: 1400.15.01	Issue Date: 8/9/2010
PURPOSE: To establish policies and procedures for Cage Cashiers to issue and redeem Gift Cards.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	4/2/2010
QTGA Submission	4/8/2010
QTGA Return	4/15/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/28/2010
Compliance Review	7/30/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010

POLICY:

Purchase

1. Gift cards may be purchased at the Cashier Cage or redeemed at the Cashier Cage. Gift Cards can be sold and used at all outlets within Downstream Casino Resort (DCR).

2. Gift cards may be purchased for a maximum of $1,000.

Redeem

1. Gift Cards can be used for purchase of goods and services or can be redeemed for cash or chips at the Cashier Cage.

2. A lost or stolen card cannot be replaced. After twelve (12) months from the date of purchase a $5 per month maintenance fee will be deducted from the remaining balance.

PROCEDURE

1. Each Cage Cashier or Cage Supervisor or above is issued an Infogenesis card that contains a specific password.

2. Patron requests to purchase a Gift Card.

3. The Cashier shall ask the patron the method of payment:

    a. Cash

    b. Debit or Credit Card

Steps to Process a Gift Card Sale

1. Cage Cashier shall swipe their Infogenesis card through the computer system.

2. Choose “Open gift card credit”.

3. Enter the amount.

4. Cage Cashier will be prompted “Are you sure you want to proceed?”

5. Cage Cashier will select “YES”.

6. The Cage Cashier shall obtain a gift card and swipe it through the system.

7. Each gift card has a unique number on the card. The Cage Cashier shall confirm the gift card number.

8. Hit “OK”.

9. The Cage Cashier shall be prompted “How Tendered”.

10. Cash, Debit or Credit Card will be selected.

11. Enter the amount.

12. Hit “ACCEPT”.

13. Two receipts will print.

    a. One receipt is provided to the patron.

b. One receipt is for the Cage Cashier to use as a balancing tool. The patron will be asked to sign the Cage Cashier's receipt.

14. At the end of the Cage Cashier's shift, the Cashier shall total all receipts together that were **purchased with cash** and achieve a grand total. The grand total of gift cards purchased with cash will be sold as a paid in (a positive) on the Cashier's Settlement Sheet to the Main Bank.

15. **All gift cards purchased with a credit card** shall be carried twice on the Cashier's settlement sheet. Since no funds were received into the Cashier's bank or given out of the Cashier's bank, the receipts shall be totaled and written on the Cashier's Settlement Sheet **once as a positive and once as a negative.** (This will cancel out the total.)

16. The Main Bank Cashier will calculate the Gift Card receipts and verify the total on the Cashier's settlement sheet is the same. At the end of the Main Bank Cashier's shift, all gift certificate receipts are totaled and posted to the Main Bank Settlement Sheet and later forwarded to Income Audit in the Main Bank paperwork.

Steps to Process a Gift Card Redemption

1. A Cage Cashier shall sign onto the Infogenesis system.

2. Select "Gift Card Redemption.

3. Swipe the Gift Card to be redeemed.

4. Match the Gift Card and the balance on the screen.

5. Press "Yes".

6. A receipt will print.

7. The patron is asked to sign the receipt.

8. Pay the patron.

9. At the end of the Cage Cashier's shift, the Cashier shall total all Gift Card redemption receipts together and achieve a grand total. The grand total of redeemed gift cards shall be listed on the Cashier's final drop sheet (pg. 5) issued to the Main Bank.

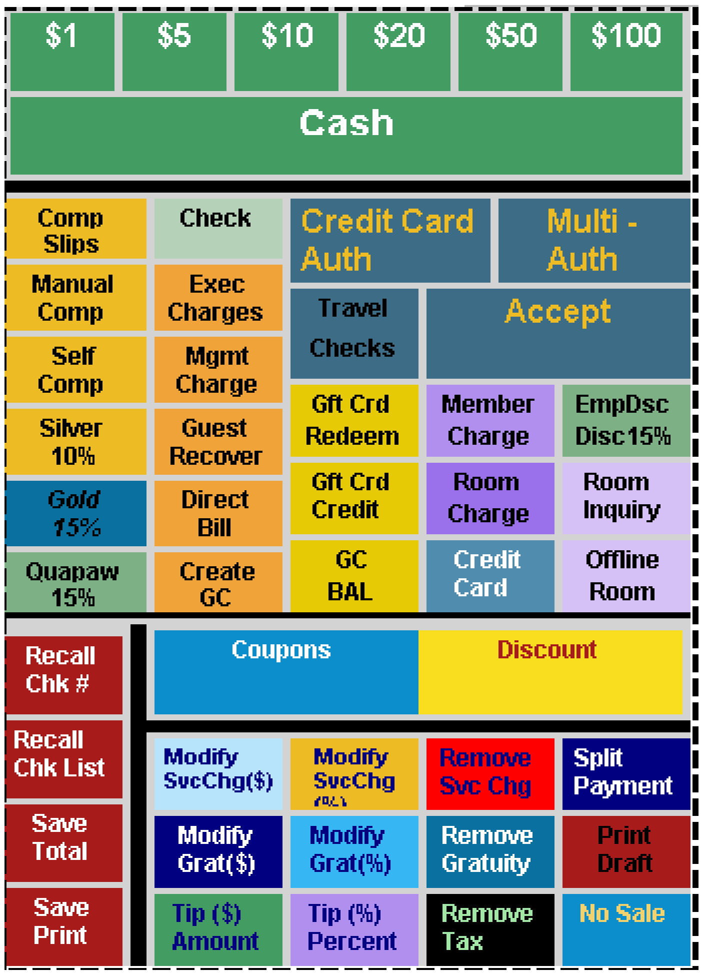
10. The Main Bank Cashier shall calculate the Gift Card receipts and verify the total on the Cashier's final drop sheet is the same. At the end of the Main Bank Cashier's

shift, all gift card redemption receipts are totaled and posted to the Main Bank Settlement Sheet and later forwarded to Income Audit in the Main Bank paperwork.

<u>Steps to Check a Gift Card Balance</u>

1. On the Left of the POS terminal screen touch tender.

2. On the tender screen you will see GC Bal.



3. Select GC Bal, this will add a 0.00 amount item to the check.

4. After the 0.00 item is on the check, select Gft Crd Redeem. It will prompt for General Administration account. Swipe the gift card and the balance on the screen is what is left on the gift card.

5. After you have finished, use the cancel check button on the left to get ready for your sale.

DownStream Casino

-- FINAL DROP --

Date: 06/26/2009

F

Time: 18:33:47

Beginning Till
60,000.00

Drop From: Cage Window # 4

Cashier: 2047
JUSTIN ADDIS

Item Description	Drop Amnt
Currency $100	19,700.00
Currency $ 50	100.00
Currency $ 20	5,940.00
Currency $ 10	2,850.00
Currency $ 5	995.00
Currency $ 1	43.00
Quarters $ 0.25 Loose	31.25
Dimes $ 0.10 Loose	8.70
Nickels $ 0.05 Loose	1.80
Pennies $ 0.01 Loose	0.46
eChecks	5,418.00
Gaming Vouchers - SCANN	14,880.79
Chips $ 500.00 - P	500.00
Chips $ 100.00 - B	6,500.00
Chips $ 25.00 -	975.00
Chips $ 5.00 -	185.00
Chips $ 1.00 -	28.00
$0.25 ANTE - Gold	1.00
Travelers Checks	50.00
Cash Advance Checks	2,335.00
Personal Checks	962.00
<Check Fee's>	-30.00
Comp Tickets	1,145.00

Drop :	62,620.00
Cash XFER (deb):	0.00
Cash XFER (cre): (	2,620.00)
Total Drop:	60,000.00
Till Amount: (	60,000.00)
O/S:	0.00

Cashier License/Signature
2047 JUSTIN ADDIS
Justin Addis 2047

Main Bank(Accepted) Lic./Signature

Main Bank(Verified) Lic./Signature

Supervisor / License #
1528

HOT SEAT DRAWING RULES FOR POKER	Policy No: 1105.11.01	Issue Date: 8/4/2010
PURPOSE: To establish procedures for the Hot Seat Drawing Promotion.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/4/2010
Compliance Review	5/27/2010
QTGA Submission	5/27/2010
QTGA Return	6/3/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Return	7/1/2010
Compliance Review	7/2/2010
QTGA Submission	7/8/2010
QTGA Return	7/21/2010
Compliance Review	7/26/2010
QTGA Submission	7/29/2010
QTGA Final Approval	8/4/2010
GM Approval	7/28/2010
DDA Final Approval	8/12/2010

POLICY

Rules governing the Hot Seat Drawing Promotion will be conspicuously posted and brochures explaining the rules will be available to any player.

HOT SEAT DRAWING PROMOTION RULES

1. Any Texas Hold'em games from which a jackpot donation is taken will be eligible for the Hot Seat Drawing Promotion.

    a. At least four players must be dealt in for any player at such a table to be eligible for the Hot Seat Drawing Promotion.

2. All winners must be at least 18 years old and have valid identification which can be one of the following:

    a. US state driver's license.

    b. US State issued identity card.

    c. US Military issued identity card.

    d. US government issued driver's license.

    e. Valid US Passport.

    Note: See Universal ID Acceptance Policy #6320.15.01 for additional information on acceptable identity cards.

3. Drawings will be done in one of three ways:

    a. During the National Football League's (NFL) regular season, drawings will be scheduled during all night games on Sunday, Monday and Thursday. Every time either team scores a touchdown or field goal, a "Hot Seat" will be drawn. The scoring of a safety by either team will not initiate a Hot Seat Promotion Drawing.

        i. If the teams combine for fewer than 9 total touchdowns and field goals, Downstream Casino Resort (DCR) Poker Room will hold the needed number of drawings to guarantee that at least 9 Hot Seat Drawing prizes are awarded.

    b. During Major League Baseball's (MLB) regular season, drawings will be scheduled during all nationally televised night game broadcasts that do not occur on a Friday or Saturday night.

        i. If a designated MLB game gets rained out or is postponed for any reason, either before or after a Hot Seat Drawing Jackpot has been awarded, DCR Poker Room will hold the needed number of drawings to guarantee that at least 9 Hot Seat Drawing prizes are awarded.

    c. When neither the NFL nor MLB is in season, the Hot Seat Drawing Promotion will be active on Sunday, Monday, and Thursday evenings.

        i. During evenings when no NFL or MLB game is scheduled, drawings will commence at 6:00 P.M. and continue until 9 drawings have been completed.

        ii. DCR Poker Room reserves the right to hold the Hot Seat Drawing Promotion on other days and at other times. This includes the right to hold drawings during more than one nationally broadcast game on the same day.

4. Any Hot Seat Promotion Drawing not determined by an NFL or MLB game will be drawn at random with not more than 60 minutes between Hot Seat drawings.

5. The winner of a Hot Seat Drawing Promotion award will be randomly determined by an electronic random generator on the Poker Room's computer.

6. Each winner will be awarded $100 in DCR cash value chips.

7. For any player to be eligible for the Hot Seat Drawing Promotion, that player must not have been issued an absent button for being dealt out by a new dealer. Also, any player that has not been absent but has missed blind button and owes the blinds, will have two minutes to get back to his or her seat to claim the Hot Seat Drawing Promotion Jackpot. In the event that an empty seat or an ineligible player is drawn, a new "Hot Seat" will be drawn.

8. This promotion shall be funded from the Player Promotional Fund as designated and explained in the Bad Beat Progressive Jackpot Rules, which states that "35% of jackpot funds will be allocated to a Player Promotional Fund. 100% of promotional funds will be returned to players through various forms of cash awards, such as cash drawings and freeroll tournaments."

9. The following procedure would be used for the payout of the Hot Seat Drawing Jackpot Promotion:

    a. The Poker Supervisor shall notify Surveillance when an eligible player is selected. Surveillance shall be informed of the amount of the award to be paid to the winner.

    b. Surveillance shall record a still photograph of the player's area at the table to confirm the player as active and eligible to receive the award.

    c. Poker Cage will prepare the Poker Room Jackpot Fund Payout Sheet for each player receiving a payout from the Hot Seat Jackpot Promotion and will, as applicable, complete and issue Form 1099 or W2-G to winning players; update the W2-G logs; complete MTL's and CRTC's if appropriate; and prepare any other documentation as may be required to meet cage accountability standards. All players receiving awards from the Hot Seat Jackpot Promotion will complete and sign a W-9.

    d. The Poker Supervisor shall witness the jackpot payment. All winning patrons must sign the Poker Room Tournament Paid Out Form (pg. 4) at the time of payment to evidence receipt of the payout. The Poker Cage Cashier or above shall sign, including badge number, the Poker Room Jackpot Fund Payout Sheet verifying the jackpot payout.

DOWNSTREAM
CASINO RESORT

1532

Poker Room Tournament
PAID OUT

Date:________________________Time:________________

Amount $________________ Type: ☐ Cash ☐ Chips

Patron Name:________________________________
(Please print name)

Q Card # ________________________________

____

Patron Sig. ________________________________

Cashier Sig./ID# ____________________________

White - Poker Room Yellow - Patron Pink - Book

SP 20152

INTERNAL AUDIT POLICY	**Policy No:** **6020.01.01**	**Issue Date:** 8/9/2010 **Revised Date:** 8/2/2010
PURPOSE: Establish an Internal Audit policy that satisfies the requirements of applicable regulations.		

DCR Compliance – ITEM Tracking	Date
Issue Date	08/9/2010
Compliance Review	07/08/2009
QTGA Submission	07/08/2009
QTGA Return	09/29/2009
Compliance Revisions based on QTGA Review	11/03/2009
QTGA Submission	11/04/2009
QTGA Return	11/12/2009
Compliance Revisions based on QTGA Review	11/16/2009
QTGA Submission	11/25/2009
QTGA Return	12/17/2009
Compliance Review	6/24/2010
QTGA Submission	7/1/2010
QTGA Return	7/28/2010
Compliance Review	8/2/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010

POLICY

1. Federal regulations (25 CFR 542.42) require that a separate Internal Audit Department be maintained whose primary function is performing internal audit work that is independent with respect to the departments subject to audit.

2. The Downstream Casino Resort (DCR) Internal Audit Department shall report directly to the General Manager. Any disputes or conflicts must be settled between the QTGA and the Internal Audit Department.

3. The DCR Internal Audit Department shall operate with audit plans, which, at a minimum, address the Minimum Internal Control Standards (MICS). Additionally, the Internal Audit Department shall properly document the work performed, conclusions reached, and the resolution of all exceptions.

4. DCR may elect to have an external audit agency conduct the internal audit work and address compliance with the MICS instead of having an Internal Audit Department.

5. The following audits shall be done at a minimum, annually:

   a. Card Games - The DCR Internal Audit Department or external audit agency, at a minimum, must audit the following procedures for card games according to the federal regulations:

      i. Operations - This should include the location, distribution, and changing of decks, and the shuffling of cards. It should also include the inventory of cards and whether they are located in a secure location.

      ii. Cash exchange procedures.

      iii. Shill transactions.

      iv. Count procedures.

   b. Table Games - The DCR Internal Audit Department or external audit agency, at a minimum, must audit the following procedures for table games according to the federal regulations:

      i. Fill and credit – This should include both the fill/credit request process and the actual fill/credit itself.

      ii. Pit credit play procedures.

      iii. Rim credit procedures.

      iv. Soft Drop/Count procedures and subsequent transfer of funds – This should include the transportation of drop boxes to and from tables.

      v. Testing of count room currency counters and/or currency interface.

      vi. Location and control over sensitive keys – This should include audits of the ordering and duplicating process for sensitive keys. As for access to sensitive keys, the DCR Internal Audit Department or external audit agency should audit the Key Watch System to ensure that there are no technological or mechanical problems.

      vii. Tracing of source documents to accounting records and reconciliations to restricted copies.

viii. Opening and closing procedures for gaming tables.

c. Electronic Gaming Machines - The following procedures must be audited according to the federal regulations:

i. Jackpot payout/Fills

ii. Gaming machine fills/Credits

iii. Gaming machine drop/count and bill acceptor drop/count and subsequent transfer of funds.

iv. Count room counting and unannounced testing of currency counters.

v. Gaming machine drop cabinet access.

vi. Tracing of source documents to accounting records and reconciliations to restricted copies.

vii. EPROM duplication, location and control over sensitive keys.

viii. Compliance with MICS procedures for ticket machines and customer account standard.

d. Cage – Cage accountability shall be reconciled to the general ledger according to the MICS procedures for Cage.

e. Drop and Count – Drop and Count shall be reconciled to the general ledger according to the MICS procedures for Drop and Count.

f. Accounting – Accurate, complete, legible, and permanent records of all transactions pertaining to revenue and gaming activities shall be prepared. The records shall be in accordance with Generally Accepted Accounting principles and maintain detailed and supporting subsidiary records in compliance with MICS procedures for Accounting.

g. Surveillance – This should include periodic audits of access to surveillance rooms and tapes, closed circuit television system, and most importantly, audits of coverage areas to ensure that all areas are being monitored in compliance with MICS procedures for Surveillance.

h. Complimentary Services or Items – The DCR Internal Audit Department or external audit agency should perform periodic audits to ensure compliance with the authorization, issuance, and tracking of complementary services and items. For example, the DCR Compliance Department shall ensure that Team Members are not mishandling complementary services and items and that unused coupons are strictly monitored and accounted for in compliance with MICS procedures for Complimentary Services or items.

i. Information Technology – The DCR Internal Audit Department should audit the Information Technology Department to ensure that access to systems and networks are limited to authorized personnel only to prevent unauthorized access that could cause errors or compromise data or processing integrity. These audits shall be in compliance with MICS procedures for Information Technology.

6. Other audits deemed necessary by the Downstream Development Authority, the QTGA, the DCR Internal Audit Department, or other entity designated by the Tribe will be performed when requested.

7. Reports documenting audits performed shall be maintained and made available to QTGA upon request. The audit reports shall include the following information:

    a. Audit objectives.

    b. Audit procedures and scope.

    c. Findings and conclusions.

    d. Recommendations, if applicable.

    e. Management's response.

8. Management shall be required to respond to the internal audit findings stating corrective measures to be taken to avoid recurrence of the audit finding. Such management responses shall be included in the internal audit report that will be delivered to the Tribe, QTGA, and department where audit findings were identified. Material exceptions resulting from Internal Audit work shall be investigated and resolved and the records shall be retained for five (5) years.

ISSUING CASINO OUTLET FLOATS THROUGH THE MAIN BANK	Policy No: 1400.44.02	Issue Date: 8/5/2010
PURPOSE: To establish policy and procedures for issuing Casino outlet floats from the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
QTGA Submission	7/08/2009
QTGA Return	11/6/2009
Compliance Review	3/19/2010
QTGA Submission	3/25/2010
QTGA Return	4/8/2010
Compliance Review	4/14/2010
QTGA Submission	4/15/2010
QTGA Return	4/22/2010
Compliance Review	4/22/2010
QTGA Submission	4/26/2010
QTGA Final Approval	5/6/2010
GM Approval	4/26/2010
DDA Final Approval	5/14/2010
Revisions to Final	6/9/2010
QTGA Submission	6/10/2010
QTGA Return	6/24/2010
Compliance Review	6/25/2010
QTGA Submission	7/1/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	7/29/2010
GM Approval	7/30/2010
QTGA Approval	8/5/2010
DDA Approval	8/12/2010

POLICY

In order to operate efficiently, the casino outlet floats shall be issued, dropped and counted through the Main Bank. The float bags are green in color and have a designated number labeled on the side of the bag, large enough for a Surveillance review.

ISSUING PROCEDURE

1. The Casino Outlet Cashier consists of the following departments:

   a. Food and Beverage

b. Hotel Front Desk

c. Hotel Retail (Gift Shop)

2. Each Outlet Cashier shall come to the Main Bank to request a “float” to be issued, during their shift to service a patron.

3. The Main Bank Cashier shall issue a float in one of the following amounts depending on which department the outlet Cashier is assigned to:

    a. $200 Floats (assigned to Legends, Buffalo Grille, and Portable Bar)

        i. 2 x $10 = $20

        ii. 20 x $5 = $100

        iii. 60 x $1 = $60

        iv. 80 x $.25 = $20

    b. $500 Floats (assigned to WNBD, Service Bar, Buffalo Grille, Hotel Front Desk, and Gift Shop)

        i. 20 x $10 = $200

        ii. 33 x $5 = $165

        iii. 100 x $1 = $100

        iv. 120 x $.25 = $30

        v. 80 x $.05 = $4

        vi. 100 x $.01 = $1

    c. $ 750 Floats (assigned to WNBD, Service Bar, Buffalo Grille, Hotel Front Desk, and Gift Shop)

        i. 15 x $20 = $300

        ii. 17 x $10 = $170

        iii. 30 x $5 = $150

iv. 100 x $1 = $100

v. 120 x $.25 = $30

d. $1000 Floats (assigned to Spring River, Bartenders, Red Oak, and Service Bar)

i. 30 x $10 = $300

ii. 93 x $5 = $465

iii. 200 x $1 = $200

iv. 120 x $.25 = $30

v. 80 x $.05 = $4

vi. 100 x $.01 = $1

e. $1500 Floats (Weekend Bartenders – Weekends)

i. 25 x $20 = $500

ii. 25 x $10 = $250

iii. 100 x $5 = $500

iv. 200 x $1 = $200

v. 200 x $.25 = $50

4. The Main Bank Cashier shall go into the computerized system and find the outlet Cashier's name and issue the corresponding float to the outlet Cashier. A two part float assignment form shall print (pg. 5). The form contains the following:

a. Shift

b. Time

c. Location

d. Float Amount

e. Outlet Cashier's Name and badge number

f. Main Bank Cashier’s Name and badge number

g. Each denomination issued amount

h. Main Bank Cashier’s Signature line, including badge number

i. Outlet Cashier’s Signature line, including badge number

5. The Outlet Cashier shall receive the original copy (white) of the ABACUS assignment form along with the funds and the Main Bank Cashier shall receive the Duplicate (yellow) copy. The Main Bank Cashier shall place the green float bag flat with the number and dollar amount “up” in clear view of Surveillance before issuing out the float.

Example of Float Assignment is on the right side

DownStream Casino

Float Receive

Shift: SWING

Date: 03/14/2010

Time: 18:31:37

FL

Assigned To:

2445 Miller Dusty

Received From:

Float # 3 (HOTEL FRONT DESK)

Item Description	Amount
<Float Credit Slip>	-500.00
Currency $100	400.00
Currency $ 10	20.00
Currency $ 5	150.00
Currency $ 1	95.00
Quarters $ 0.25 Loose	20.25
Dimes $ 0.10 Loose	10.00
Nickels $ 0.05 Loose	3.70
Pennies $ 0.01 Loose	1.00
Hotel Revenue (+/-)	-199.95
NET TOTAL:	0.00

Banker's License/Signature

468 MICHAEL HEIFNER

468

Employee Signature/Lic. #

2445 Miller Dusty

DownStream Casino

FLOAT ASSIGNMENT

Shift: GRAVE

Date: 03/14/2010

Time: 07:02:54

FL

Location: HOTEL FRONT DESK

Float Amount: 500.00

Employee Lic. # / Name:

2445 Dusty Miller

Banker:

1533 CHRISTINA GRUBB

Item Description	Amount
Tens	200.00
Fives	165.00
Ones	100.00
Quarters (Loose)	20.00
Dimes (Loose)	10.00
Nickles (Loose)	4.00
Pennies (Loose)	1.00

Banker's Signature/Lic. #

1533 CHRISTINA GRUBB

cgrubb1533

Employee Signature/Lic. #

2445 Dusty Miller

Dusty Miller 2445

Supervisor / Licence #

Main Bank Count In Procedure	Policy No: 1400.41.01	Issue Date: 8/10/2010
PURPOSE: To establish accounting controls and procedures for counting into the Main Bank and transferring accountability of the Main Bank.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/10/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	7/1/2010
QTGA Return	7/28/2010
Compliance Review	7/30/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/10/2010
DDA Final Approval	8/12/2010

POLICY

1. All transactions that flow through the Cage shall be summarized on a Cage accountability form on a per shift basis.

PROCEDURE

1. The Cage and Main Bank inventories shall be counted by the incoming and the outgoing Cashiers. These Team Members shall make individual counts for comparison of accuracy and maintenance of individual accountability.

2. Such counts shall be recorded at the end of each shift during which activity took place. All discrepancies shall be noted and investigated. Unverified transfers of cash and/or cash equivalents are prohibited.

COUNT IN PROCESS

1. The incoming Main Bank Cashier shall obtain a blank count sheet (pg. 4) and the following items shall be counted and listed on the count sheet:

    a. Bulk count all strapped and bundled U.S. Currency.

b. Hand count or run through the currency counter the loose currency by denomination.

c. Count all bagged coin, rolled coin and loose coin by denomination.

d. Count all mutilated currency by denomination.

e. Run a calculator tape on all items on hold for deposit. These consist of:

   i. Personal checks

   ii. Cash Advances

   iii. Downstream Casino Resort (DCR) checks

   iv. Cash

   v. Safekeeping

f. Count all chips on hold by denomination

g. Count all floats and banks on hold. These consist of:

   i. Cage Banks on hold

   ii. Main Bank Floats on hold

   iii. TRU imprest

   iv. TRU Fills Held

   v. AJM Fills Held

   vi. Cage Banks Issued

2. After the incoming Main Bank Cashier has listed all inventory items on the count sheet, the Main Bank Cashier shall calculate:

   a. All the U.S. Currency and acquire a grand total amount.

   b. All the U.S. Coin and acquire a grand total amount.

   c. All the Mutilated currency and acquire a grand total amount.

d. All the “On Hold for deposit items” and acquire a grand total amount.

e. All the Chips on hold and acquire a grand total amount.

f. All the Floats and Banks and acquire a grand total amount.

3. Once all items have a grand total amount, the Cashier shall calculate all grand total amounts and this figure is the “Grand total of all Inventory” in the bank.

4. The incoming and the outgoing Cashiers shall compare the “Grand total Inventory” amounts. If both figures are the same, the incoming Cashier shall now own the bank.

5. The incoming Cashier shall sign including badge number, the outgoing Cashier’s paperwork, and their incoming count sheet, and the outgoing Cashiers paperwork shall be sent to Accounting for audit purposes.

DOWNSTREAM CASINO MAIN BANK INVENTORY - COUNT IN SHEET

DATE: ____________________ SHIFT: ______________

U.S CURRENCY					
DENOM	BUNDLED	STRAPPED	CLIPPED	LOOSE	TOTAL
$100.00					
$20.00					
$10.00					
$5.00					
$1.00					
TOTAL					

U.S. COIN			
DENOM	ROLLED	LOOSE	TOTAL
$0.01			
$0.05			
$0.10			
$0.25			
$0.50			
$1.00			
Ikes			
SBA			
MUTE			
TOTAL			

U.S MUTILATED CURRENCY		TOTAL
$100.00		
$50.00		
$20.00		
$10.00		
$5.00		
$2.00		
$1.00		

CHIPS ON HOLD			
Purple			
Black			
Green			
Red			
Blue			
White			
		GRAND TOTAL	

On Hold For Deposit		
Global Checks		
Global Advances		
Downstream Checks		
Other Checks		
Cash		
Bus Checks		
Safekeeping Deposit		
	GRAND TOTAL	

Floats and Banks			
Poker Impressment			$200,000
TRU Impressment			
AJM Impressment			
ATM Impressment			
Floats Prepared			
Floats Outstanding			
Window Banks Outstanding			
Window Banks Prepared			
		TOTAL	

Total Inventory

____

Incoming Main Bank Signature and Badge #

NO ID JACKPOTS PROCESSED IN THE CAGE	**Policy No:** **1400.71.01**	**Issue Date:** 8/9/2010 **Revised Date:** 8/2/2010
PURPOSE: To establish policy and procedures to account for no ID jackpots processed in the Cage.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/9/2010
Compliance Review	4/28/2010
QTGA Submission	4/29/2010
QTGA Return	5/13/2010
Compliance Review	6/3/2010
QTGA Submission	6/3/2010
QTGA Return	6/18/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
Compliance Review	7/19/2010
QTGA Submission	7/22/2010
QTGA Return	8/2/2010
Compliance Review	8/4/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010

POLICY

All no ID jackpots must be processed through the Cage and sent to Income Audit on the same day/shift that the jackpot was hit. If the patron does not have an ID, the jackpot will be processed as Safekeeping until proper ID is provided.

PROCEDURES

DEPOSIT PROCEDURE

1. A NO ID jackpot shall be processed as normal through the Main Bank Jackpot Window. The jackpot slip, also called the Starter Ticket (pg. 7) shall be incorporated into the Main Bank Cashier's drawer.

2. A copy of the jackpot slip (pg. 7) will be placed with the cash and the cash will be entered into Safekeeping through the Cage and Table Accounting (CTA) system as cash.

3. If the patron does not have a Q-club card, the Cage Supervisor shall create a Q-Club Card account through the Patron Management system. All missing information in Patron Management must be updated and include the patron's ID information.

4. The duplicate copy "yellow" of the Safekeeping receipt (pg. 5), along with the cash will go into a front line Cashier window and brought into ABCUS through the drop process. The receipt is a negative to the Cashier's window bank.

5. A safekeeping envelope will be prepared by the Cage Supervisor or Main Bank Cashier and the original copy (white) of the Safekeeping receipt (pg. 5), along with the copy of the jackpot slip (pg. 7), shall go into the patron's safekeeping envelope.

6. The triplicate (pink) copy shall be provided to the patron.

7. The deposit shall be logged by the Cage Supervisor or Main Bank Cashier on the shift's Safekeeping Log (pg. 6) as a deposit entry. The safekeeping log shall be sent to Income Audit at the end of the shift in the Marker bank's paperwork.

WITHDRAWAL PROCEDURE

1. When the patron returns with his/her valid ID, a copy of the ID shall be made by the Cage Supervisor or above. The Electronic Gaming Machine Department (EGM) shall be made aware that the patron has returned with his/her valid identification.

2. According to the Universal ID Acceptance Policy, #6320.15.01, the following forms of identification are valid:

    a. Valid U.S. State issued driver's license

        i. Must be current to be valid

    b. Valid U.S. State issued Identification card

        i. Must be current to be valid

    c. U.S. Passport

        i. Must be current to be valid

    d. U.S. territory driver's license

    e. U.S. Federal Identification card, such as:

        i. Permanent resident

ii. Resident alien

iii. Government employee

f. U.S. Military Identification card

3. The EGM Attendant or above shall reprint the jackpot and taxes due if any.

4. If the patron is requesting a check for all or any amount, the EGM Attendant shall make the Cage Supervisor or above aware of this at that time.

5. The Cage Supervisor shall provide the “Hand Pay Voucher” (pg. 9) and the W2G (pg. 10) to the EGM Attendant.

6. The EGM Attendant or above shall take the paperwork and proceed to the Front Line Cashier Cage Window assigned to complete Safekeeping Deposits and Withdrawals, with the winner’s ID and Jackpot Request.

7. The Cage Cashier or above shall complete a safekeeping withdrawal through the CTA system.

8. The EGM Attendant shall be asked to sign their name and badge number on all three copies of the Safekeeping receipt. The triplicate (pink) copy shall be given to the EGM Attendant who will later give it to the patron. The original (white) copy and the duplicate (yellow) copy will be retained by the Cage Cashier or above for balancing purposes.

9. The EGM Attendant shall sign including badge number,on the “Floorperson” line of the Handpay voucher and the Cage Cashier or above shall sign, including badge number,on the “Cashier” line of the handpay voucher. The Cage Cashier or above shall retain the “Cage” copy of the Handpay voucher and the cage copy of the tax form for balancing purposes.

10. The Cage Supervisor shall pay the EGM Attendant the amount of the jackpot, less any taxes using the Cage Currency Payout Procedures, which is identified in policy #1400.12.01.

11. The EGM Attendant shall verify the funds by counting again the funds before leaving the Cage window. If there is a discrepancy, the EGM Attendant shall place the funds back on the counter and notify the Cage Supervisor, who shall recount the funds, correct the error, and pay the EGM Attendant again following the Cage Currency Payout Procedures, policy #1400.12.01.

12. If any taxes are withheld, the Cage Supervisor shall circle the amount of taxes on the W-2G form (pg. 10).

13. The patron shall be paid out in the "Private Payout" area for EGM payouts. All payouts must have a witness and follow the EGM Jackpot Payouts Policy, #1200.12.01.

14. All missing information in Patron Management must be updated and include the patron's ID information.

15. The white copy of the Safekeeping form shall be placed into the Cage Supervisor's cash drawer or in the cash drawer of whichever Cage Cashier paid out the withdrawal. The Safekeeping form is a positive to the window. The receipt shall be turned into the Main Bank through the Cage Supervisor's window drop or Cage Cashier's window drop, thus lowering the Safekeeping inventory amount on hold in the Main Bank.

16. The Main Bank Cashier shall send the Safekeeping withdrawal to Income Audit with the end of shift's paperwork.

17. The Cage Supervisor or Main Bank Cashier shall log this transaction on the Cage Shift's Safekeeping Log (pg. 6) and zero out the Safekeeping envelope. The envelope is attached to the log and turned into Income Audit at the end of shift.

18. The patron's zeroed out Safekeeping card (pg. 8) shall be attached to the end of shift paperwork and sent to Income Audit in the Marker Bank's paperwork.

Safe Keeping Deposit

Downstream Casino Resort

Date:	03/19/2010 16:01:47
Acct. Date:	03/19/2010
Doc No:	110000011
Cashier:	Shannon Tarvin

Player ID: 1431
MICKEY MOUSE
8675309
JOPLIN, MO 64801

Description	Amt
11.00	$1

Total Deposit	$1
Safe Keeping Balance	$1

Player: MICKEY MOUSE

Cashier: Shannon Tarvin

MP0110000011

Withdrawal (S
Withdrawal

Downstream Casino Resort

Date:	03/19/2010 16:06:58
Acct. Date:	03/19/2010
Doc No:	130000013
Cashier:	Shannon Tarvin

Player ID: 1431
MICKEY MOUSE
8675309
JOPLIN, MO 64801

Description

11.00

Total Withdraw
Safe Keeping Balance

Player: MICKEY MOUSE

Cashier: Shannon Tarvin

MP0130000013

Sample of Front Money/Safekeeping Customer Log

DOWNSTREAM
CASINO RESORT

MANUAL FRONT MONEY/SAFEKEEPING CUSTOMER TRANSACTION LOG

NAME:		ACCOUNT #	DATE:
DEPOSIT INFORMATION		AMOUNT USED < >	TOTAL AVAILABLE

TYPE OF TRANSACTION	TIME	AMOUNT	DOC #	REDUCTION TO DEPOSIT AMOUNT	ADDITION TO DEPOSIT AMOUNT	BALANCE	CASHIER INITIALS AND #
				< >			

DOWNSTREAM
CASINO RESORT

SLOT STARTER TICKET

☐ Jackpot Payout ☐ Cancel Credit

Date:				Time:		
Slot Machine Number				Shift Days Swing Grave		
Location Number				Booth Window Number		
DENOMINATION						
.01	.02	.05	.25	1.00	5.00	Other ______
No. Coins Played		No. Lines Played		Amt. Paid by Machine $		
WINNING REEL COMBINATION						
Amount of Payout $						
(PRINT AMOUNT - ALPHA)						
Slot Booth Cashier				License Number		
Slot Att./Tech.				License Number		
Slot Shift Supervisor				License Number		
Slot Shift Manager				License Number		
SECURITY				License Number		

SP 20048

PATRON INFORMATION - Please Print Clearly

Social Security # ___ ___ ___ - ___ ___ - ___ ___ ___ ___

Social Security Name	Last	
	First	
	Mid	

Address-Street: ______________________________

Street: ______________________________

City: ______________________________

State: ____________________ Zip: ____________

Status: U.S. Resident with Social Security Number and Picture ID ☐ ___% withholding

U.S. Resident without Social Security Number and Picture ID ☐ ___% withholding

Non Resident Alien - Country ☐ ___% withholding

Under penalties of perjury, I certify (i) This form is my correct tax identification number, and (ii) I am the recipient of winnings, and (iii) no other person is entitled to any portion of these winning, I understand that the information on this form will be used for W2-G reporting and withholding.

Patron Signature: ______________________________ Date: ____________

ACCOUNT NUMBER

NAME

DATE	CASHIER'S INITIAL AND #	MARKER AMOUNT	PAYMENT AMOUNT	TOTAL
			< >	

SP20581

FJP

Hand Pay Voucher

Downstream Casino

VOUCHER # 1000066840

1000066840

DATE 07/15/2010

TIME 11:45:37AM

BOOTH 6

W2-G ☐ 1042S ☐ [W2-G]

TYPE Jackpot AMOUNT $ $ 9,600.00

☐ W\H's

☐ PAY

LOCATION 050302

MACHINE 725012 ALPHA NINE THOUSAND SIX HUNDRED DOLLARS AND NO CENTS

DENOM $ 10.00

SYMBOL 7 MB MB COINS PLAYED 3 PAYMENT

\# 2465 # 6085

FLOORPERSON SLOT FLOOR MANAGEMENT

\# 2444 #

CASHIER WITNESS

\# #

WITNESSING ATTENDANT / FLOORPERSON PATRON

CAGE COPY

☐ CORRECTED

PAYER'S name, address, ZIP code, federal identification number, and telephone number	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-0238 2010 **Form W-2G** **Certain Gambling Winnings**
	3 Type of wager	4 Date won	
	5 Transaction	6 Race	
	7 Winnings from identical wagers	8 Cashier	
WINNER'S name, address (including apt. no.), and ZIP code	9 Winner's taxpayer identification no.	10 Window	For Privacy Act and Paperwork Reduction Act Notice, see the **2010 General Instructions for Certain Information Returns.**
	11 First I.D.	12 Second I.D.	
	13 State/Payer's state identification no.	14 State income tax withheld	
Under penalties of perjury, I declare that, to the best of my knowledge and belief, the name, address, and taxpayer identification number that I have furnished correctly identify me as the recipient of this payment and any payments from identical wagers, and that no other person is entitled to any part of these payments. **Signature ▶** **Date ▶**			**Copy D** **For Payer**

Form **W-2G** Department of the Treasury - Internal Revenue Service

Patron Complimentary Point Liability Calculation Policy	Policy No: 6310.03.01	Issue Date: 7/23/2010
PURPOSE: To establish a policy for estimating the liability associated with Patron Complimentary Points based on earnings and redemptions.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/23/2010
QTGA Submission	7/15/2009
QTGA Return	11/6/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Final Approval	7/23/2010
GM Approval	7/22/2010
DDA Final Approval	8/12/2010

POLICY

1. It is the policy of Income Audit to establish a procedure to estimate the net liability and corresponding period expense associated with patron complimentary point earnings that are not redeemed at the end of an accounting period.

2. Q Club rewards patrons who use their Player's Card when playing an Electronic Gaming Machine (EGM) or Table Games. Complimentary (comp) points are accumulated based on the type of game and amount wagered. Patrons can then redeem points for hotel accommodations, restaurant services, retail purchases, promotional offers and other items of value.

3. Patrons may redeem ("exchange") comp points for 'Electronic Promotional Credits' according to promotional offers, which may be offered by Downstream Casino Resort (DCR).

DEFINITION

1. Electronic Promotional Credits – (promo credit; Xtracredit Play) are non-transferable and non-cashable credits that are only redeemable at an EGM. The credits are awarded to known patrons through marketing programs. Patrons who wish to participate must be Q- Club Card members and have a PIN code. These electronic credits are temporary and shall expire after 12 months if they are not transferred to an EGM by the patron. Point Play allows a patron to redeem earned points for EGM Play. Redeemed promo credits are recognized in EGM revenue and offset 100% in promotion allowance (promo credit expense) in the accounting period in which the redemption occurs.

2. A projection of Comp points which may be redeemed ("exchanged") for promo credits are currently not considered in the Complimentary Point Liability Calculation used to value the estimated liability and related expenses associated with the Company's Patron Complimentary Point Program. In addition, any unearned bonus promotional points which may be redeemed or exchanged for certain promotional offers are not considered in the Complimentary Point Liability Calculation use to value the estimated liability and related expenses associated with the Company's Patron Complimentary Point Program. Presently, the Company's methodology (as described below) for valuing this point liability assumes that these points will be redeemed points for hotel accommodations, restaurant services, retail purchases, and other items.

3. The balance sheet liability and expense impact of a promotion which allows redemption of Comp Points for Promotional Credits is currently considered in the accounting period in which the promotion occurs.

4. DCR may estimate the impact of such Promo Credit 'Exchanges' on the Patron Complimentary Point Liability based on Marketing Programs and guidelines covering future exchange programs. This estimate will take into consideration the frequency of such marketing promotions, redemption history and overall point redemption trends. Based on the frequency of these exchange programs, the Chief Financial Officer may decide to estimate the percentage of points that will be exchanged for Promo Credits and deduct those points from the total points outstanding before applying the factors listed below to estimate each month's Patron Complimentary Point Liability.

5. Although the player tracking system ("IGT Advantage Patron Management" (IGT)) calculates and retains point balances in accordance with the point expiration guideline, DCR estimates the actual liability based on a number of factors. The factors considered are:

    a. Inactive Points which are determined by reviewing patron's accounts for no activity for 12 months or more. No activity is defined as no redemptions or earnings. This process is currently performed through system generated reports. In the future, the system may automatically purge inactive points.

    b. Point Redemption Rate (Points Redeemed/Points Earned) based on a rolling 12 month period.

    c. Actual cost of point redemptions by outlet (1 less margin) allocated based on total redemptions by outlet on a rolling 12 month period.

PROCEDURE

1. On a monthly basis, Income Audit will perform an analysis of outstanding complimentary points.

2. At the end of an accounting period, Income Audit will generate reports detailing the following information:

   a. Outstanding comp point liability at the end of the accounting period, which includes total points earned, withdrawn and adjusted (IGT)

   b. Inactive patron report (IGT)

   c. Gross redemptions for the period by outlet (IGT)

   d. Profit and loss for each non gaming outlet (Cognos-GL)

3. To determine the net outstanding comp point liability ("NOCPL"), Operational Accounting will examine on a monthly basis, the Inactive Patron Report (accounts with no point earnings or redemptions for the a twelve month period or more) and multiply the amounts using a table similar to that shown below to determine the total amount of inactive points that should be subtracted from the total outstanding point liability balance generated in IGT. The Chief Financial Officer will periodically review the percentages used to calculate the amount to be taken into income and modify when appropriate.

Point Balance	Percentage Taken Into Income
0 – 25.00	100% will be taken into income
25.01 – 100.00	75% will be taken into income
100.00 – 250.00	50% will be taken into income
Over 250.00	Discretionary

The estimated percentage of comp points that will be exchanged for Promo Credits will also be deducted from the total outstanding point liability balance.

4. The Point Redemption Rate ("PRR") will be calculated by dividing the total redemptions (less any deductions for comp points exchanged for promo credits) by the earnings for a rolling 12 month period.

5. To determine the actual cost of point redemptions by outlet, the Casino CFO or designee will generate financial statements for each outlet in which comp points could be redeemed to determine the overall net margin for the outlet (current month excluded due to the timing of the financial close). The net margin percentage is calculated by taking the net income divided by the gross revenues. The net margin percentage is then subtracted from 100% to determine the actual cost rate (1 less margin) associated with point redemption for the outlet.

6. The rolling twelve month redemption rates by outlet are averaged to determine an expected redemption rate by outlet ("ERO") for the upcoming periods. For example, if 75% and 25% of points are redeemed at the Buffet and Hotel respectively and the Buffet has a 1 less margin of 100% and the Hotel has a 1 less margin of 50% then a point would be valued at $0.875 ($1 x 75% x 100% + $1 x 25% x 50%).

7. The final calculation is:

    a. NOCPL times PRR times ERO times 1 less margin to determine the expected points to be redeemed by outlet.

8. All expected point redemptions by outlet will be aggregated to determine the total estimated liability of patron points.

9. The Income Audit Department will then prepare a Journal Entry that adjusts the point liability in the General Ledger to equal the estimated point liability as determined by the analysis described above. The entry will debit/credit Comp Expense and debit/credit Point Liability. The Comp Expense is allocated between Tables and EGMs based on point earnings for the month. This entry is reviewed by the Chief Financial Officer and then posted in the General Ledger.

CALCULATION DEFINITIONS

1. NOCPL – Total Outstanding Comp Point Liability less Inactive Points less Estimated Percentage of Comp Points redeemed for Promo Credits.

2. PRR – Total Points Earned less Total Points Withdrawn less Adjustments divided by Total Points Redeemed for a rolling 12 months.

3. ERO – Points Redeemed by Outlet divided by Total Points Redeemed by All Outlets for a rolling 12 month period multiplied by One Less Margin.

4. One Less Margin is the Net Profit by Outlet divided by Gross Revenue by Outlet for the prior month.

5. Calculated Comp Point Liability = NOCPL x PRR x ERO.

Patron Deposits Front Money/Safekeeping	Policy No: 1400.09.01	Issue Date: 8/5/2010
PURPOSE: Establish adequate procedures to control and monitor patron Deposits of Front Money/Safekeeping.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
QTGA Submission	5/27/2009
QTGA Return	11/6/2009
Compliance Review	3/22/2010
QTGA Submission	4/1/2010
QTGA Return	4/12/2010
Compliance Review	4/15/2010
QTGA Submission	4/22/2010
QTGA Return	4/29/2010
Compliance Review	5/3/2010
QTGA Submission	5/6/2010
QTGA Return	5/13/2010
Compliance Review	6/3/2010
QTGA Submission	6/3/2010
QTGA Return	6/18/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/23/2010
Compliance Review	7/26/2010
QTGA Submission	7/29/2010
GM Approval	7/28/2010
QTGA Final Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

1. A Downstream Casino Resort (DCR) patron may place monies (cash, chips) or monetary instruments (Cashier's/Official checks) on hold at the Main Cashier Cage. The two types of patron deposit accounts are Front Money and Safekeeping Accounts.

2. Both accounts require the patron to complete a Front Money Card (pg. 10-11)(Credit Application, without the request for credit – denoted on the front as "Front Money" or "Safekeeping"). (Credit information will not be recorded. The Credit Application form is for documentation of the front money and/or safekeeping account only.)

PROCEDURES

1. The patron comes to a Cage Cashier and requests to make a Front Money/Safekeeping Deposit. The Cage Cashier will obtain the following from the patron and make two copies of each:

   a. Valid ID, which consists of the following:

      i. Valid US state issued driver's license

      ii. US State issued ID cards

      iii. US Military ID cards

      iv. US Government issued Driver's License

      v. US Passports

      See Universal ID Acceptance Policy, #6320.15.01 for detailed additional information on valid ID's.

   b. Social Security card (If the patron does not have a social security card, a W-9 must be completed by the patron.)

   c. Patron's Q-Club Card

Note: The only exception for opening a Safekeeping Account without a Valid ID is for the processing of no ID jackpots. See "No ID Jackpots Processed in the Cage" policy #1400.71.01 for additional information.

2. If a patron deposits funds and desires to use his/her funds as markers, the funds will be placed into a Front Money Account.

3. If a patron has not established a credit account and has no desire to use markers, the funds must be placed in a Safekeeping Account. Also, a deposit for business purposes (e.g. a group depositing funds for distribution at a banquet) will be placed in a Safekeeping Account.

4. Front Money Deposits and Safekeeping Deposits can only be completed at the Cage.

5. Required information on the Front Money/Safekeeping application form (Same form as credit application):

    a. Name, residence address. (P.O. Box is acceptable for mailing but a physical street address is needed for credit.)

    b. Home phone number and cell number

    c. Date of birth (D.O.B.)

    d. Copy of the Social Security Card or a completed W-9

    e. Signature on application

    f. Valid ID

6. The Cage Cashier or above shall utilize the Cage and Table Accounting system (CTA), pull up the patron by name on player's card, verify the name with the valid ID, enter the amount of the deposit, the method of the deposit (cash, chips, check or other) and denote it as Front Money or Safekeeping. The Cage Cashier or above shall also input all the following information:

    a. Patron's name and Q-Club account number

    b. Date of Deposit and shift period

    c. Amount of deposit (including alpha and numeric)

    d. Method of deposit (chips, cash, check or other)

    e. Patron's signature line

7. A completed Front Money/Safekeeping deposit receipt form will print as a three-part, pre-numbered form with the same receipt number on all copies. (pg. 13)

8. The Cage Cashier or above shall do the following:

a. Obtain the funds from the patron.

b. Count the funds in clear view of Surveillance and request a Cage Supervisor to verify the funds.

c. Obtain the signature of the patron.

d. Sign the Front Money/Safekeeping deposit receipt indicating receipt of the deposit.

e. Have the Cage Supervisor or above sign and include badge number indicating verification of the deposit.

f. Give the triplicate (pink) copy of the deposit form to the patron.

g. Place the duplicate (yellow) copy of the Front Money/Safekeeping deposit receipt in the patron's front money deposit envelope for signature verification upon withdrawal of funds.

h. Retain the original (white) copy of the deposit form in the Marker Bank drawer to be used later for balancing purposes and sent to Accounting with the shift's paperwork.

i. If cash is taken in of $3000 or greater, enter the transaction on the Multiple Transaction Log as an "IN" transaction. (See policy #1400.23.01, Multiple Transaction Log for additional information.)

j. Complete the Front Money/Safekeeping deposit Log (pg. 9). The front money deposit log contains the following information:

    i. Patron's name

    ii. Patron's Q-Club Card Number

    iii. Date and Time

    iv. Document number (deposit receipt number)

    v. Amount of deposit (including alpha and numeric)

    vi. Type of deposit (Front Money or Safekeeping)

    vii. Balance on account

    viii. Initials and badge number of Cage Cashier or above

9. All deposit activity will be entered and tracked on a patron Front Money/Safekeeping activity card (pg. 12) that shall be placed in the patron's envelope. The card contains the following information:

    a. Name

    b. Patron's Q-Club Card Number

    c. Date

    d. Cashier's initials and badge number

    e. Marker Amount

    f. Payment Amount

    g. Ending Total

MANUAL CUSTOMER DEPOSIT

1. In the event of computer system failure, the use of a manual Front Money/Safekeeping form (pg. 8) will be in effect and the Manual Front Money/Safekeeping Customer Transaction Log (pg. 9) shall also be used.

2. All Manual Customer Deposits shall be entered into the CTA system as soon as the system is available.

3. The Cage Cashier will:

    a. Obtain the patron's identification

    b. Complete the credit application for Front Money/Safekeeping (unless patron has already completed this step) with the following information:

        i. Name, residence address. (P.O. Box is acceptable for mailing but a physical street address is needed for credit.)

        ii. Home phone number and cell number

        iii. Date of birth (D.O.B.)

        iv. Copy of the Social Security Card or a completed W-9.

v. Signature of patron on application

vi. Provide valid ID (See Universal ID Policy #6320.15.01)

c. Complete a manual, three-part, pre-numbered Front Money/ Safekeeping deposit receipt form (pg. 8). The Front Money/Safekeeping receipt form contains the following information:

i. Patron's Name and Q-Club Card number

ii. Date of deposit

iii. Amount of deposit (including alpha and numeric)

iv. Method of deposit (chips, cash, check or other)

v. Patron's signature

vi. Signature and badge number of Cage Cashier or above taking the deposit

vii. Signature and badge number of Cage Supervisor verifying the deposit

4. The Cage Cashier or above shall do the following:

i. Obtain the funds from the patron.

ii. Count the funds in clear view of Surveillance and request a Cage Supervisor to verify the funds.

iii. Obtain the signature of the patron.

iv. Give the triplicate (pink) copy of the deposit form to the patron.

v. Place the duplicate (yellow) copy of the deposit form in the patron's front money deposit envelope for signature verification upon withdrawal of funds.

vi. Place the original (white) with the Cage Cashier's paperwork in the Marker Bank drawer to be used later for balancing purposes and sent to Accounting with the shift's paperwork.

vii. Follow the Anti-Money Laundering Program Policy (#6320.14.01).

viii. Complete the Front Money/Safekeeping Deposit Log, which contains the following information:

1. Patron’s name
2. Patron’s Q-Club Card Number
3. Date and Time
4. Document number (deposit receipt number)
5. Amount of deposit (alpha and numeric)
6. Type of deposit (Front Money or Safekeeping)
7. Signature of Cage Cashier or above and badge number
8. Balance on account

Sample of Safekeeping and Front Money Deposit/Withdrawal Form

DOWNSTREAM
CASINO RESORT

FRONT MONEY SAFEKEEPING

☐ WITHDRAWAL ☐ DEPOSIT

DATE:	SHIFT: D S G	LOCATION
PATRON NAME		
ACCOUNT NUMBER		MMN

TYPE OF REFUND	AMOUNT	
CASH		
CASINO CHEQUE		
TOTAL DEPOSIT		
TOTAL WITHDRAWAL		

Written Amount	
Patron Signature:	
Cashier Signature:	Lic #
Chip Bank Signature:	Lic #
Supervisor Signature:	Lic #

Sample of Manual Front Money/Safekeeping Customer Log

DOWNSTREAM
CASINO RESORT

MANUAL FRONT MONEY/SAFEKEEPING CUSTOMER TRANSACTION LOG

NAME:		**ACCOUNT #**		**DATE:**	
DEPOSIT INFORMATION		**AMOUNT USED**	**<**	**>**	**TOTAL AVAILABLE**

TYPE OF TRANSACTION	**TIME**	**AMOUNT**	**DOC #**	**REDUCTION TO DEPOSIT AMOUNT**	**ADDITION TO DEPOSIT AMOUNT**	**BALANCE**	**CASHIER INITIALS AND #**
				< >			

DOWNSTREAM
CASINO RESORT

CASINO CREDIT APPLICATION

69300 East Nee Road, Quapaw, OK 74363

Toll Free: 1-888-DWNSTRM (396-7876)
Website: downstreamcasino.com

CUSTOMER INFORMATION

Name ______________________________ Date of Birth ____________
First Middle Last
Address ______________________ Social Security Number ____________
City/Province ____________ State/Country ____________ Zip Code ________
Residence Phone ( ) ________ E-Mail Address ______________ Sex ❐ M ❐ F
Alternate Address ______________________________
City/Province ____________ State/Country ____________ Zip Code ________
Direct all Correspondence to ❐ Home ❐ Business ❐ Alternate
DL # ____________ State ____________ Expiration Date ____________
Credit Amount Requested $____________ Anticipated Arrival Date ____________

EMPLOYMENT HISTORY

Name of Firm ____________ Street Address ____________
City/Province ____________ State/Country ____________ Zip Code ________
Position with Firm ____________ Business Phone ( ) ________
Type of Business ____________ Number of Years ____________

BANK ACCOUNT INFORMATION (Checking Accounts Only)

(1) Primary Bank Name ____________ ABA Number ____________
Branch/Street Address ______________________________
City/Province ____________ State/Country ____________ Zip Code ________ ❐Business ❐Personal
Personal Account # ________ Business Account # ________ Deposit Checks to
Bank Contact, if any ____________ Phone Number ( ) ________
(2) Secondary Bank Name ____________ ABA Number ____________
Branch/Street Address ______________________________
City/Province ____________ State/Country ____________ Zip Code ________ ❐Business ❐Personal
Personal Account # ________ Business Account # ________ Deposit Checks to
Bank Contact, if any ____________ Phone Number ( ) ________

PLEASE READ AND SIGN BELOW

My signature below is an authorization for Downstream Development Authority of the Quapaw Tribe of Oklahoma (O-Gah-Pah) d/b/a Downstream Casino Resort to obtain and verify credit and employment information from any source including information pertaining to my personal and business accounts in accordance with applicable laws. I will not hold any financial institutions or current or former employers responsible for any information released. I Have accepted the terms and conditions outlined on the back of this page.

Guest Signature ____________ Print Name ____________ Date ____________

Casino Employee ____________ Badge # ____________ Date ____________

DOWNSTREAM
CASINO RESORT

Thank you for your patronage. By signing the credit request, you have agreed as follows:

You give the Downstream Casino Resort and its representative's permission to obtain and verify credit information from any source, to obtain your credit and employment history, and to exchange information with others about your credit and account experiences with the Downstream Casino Resort. You agree not to hold any of these entities responsible or liable for the information released. You agree that the Downstream Casino Resort will retain this application whether or not it approves the credit line.

Before drawing on your line of credit, if granted, you agree to sign credit instruments (i.e. checks) in the amount of the draw. You authorize the Downstream Casino Resort to complete any of the following missing items on these credit instruments: (1) the name of a payee, (2) any missing amounts up to the amount of the total draws, (3) a date, (4) the name, account number, and/or address and branch of any banks and financial institutions, and (5) any electronic encoding of the above items. This information can be for any account from which you now have or may in the future have the right to withdraw funds, regardless of whether that account now exists and whether you provided the information on the account to the Downstream Casino Resort.

You acknowledge that irrespective of any currency exchange laws in the country in which you reside, you have the ability and intent to legally repay any advance of money by the Downstream Casino Resort. You also acknowledge that an independent agent collecting front money deposits or payments on the debt is your agent and not an agent for the Downstream Casino Resort or any of its affiliates.

You fully, irrevocably, and voluntarily consent to the civil and where applicable, the criminal jurisdiction of the Quapaw Tribe of Oklahoma (O Gah-Pah) (the "Tribe" or "Tribal"), including but not limited to the jurisdiction of the Tribal Courts, the Tribal Gaming Agency, and the Tribal Gaming Commission, with respect to the interpretation and enforcement of this agreement, and your obligations under this agreement. You agree that the courts of the Tribe shall have exclusive jurisdiction over any and all claims and disputes arising hereunder, and that the parties hereto shall litigate any and all disputes hereunder, including but not limited to those involving the credit line, the debt, or the payee, exclusively in the courts of the Tribe. You consent and agree to be bound by any order or judgment of such Tribal court, and you hereby waive any and all objections to jurisdiction and venue in the Tribal courts.

You agree that this agreement shall be governed exclusively by federal law, as applicable, and by the laws of the Tribe, without regard to choice of law principles, and by other applicable laws relating to the regulation of Class II, Class III, and other gaming, including but not limited to the Tribal Gaming Ordinance. You further acknowledge and agree that this agreement has been awarded/granted by a governmental subdivision of the Tribe, and that it is to be performed solely within the Indian country jurisdiction of the Tribe.

In addition to any amounts authorized by law, you will pay interest at the rate of 18% per annum from the date of execution of the credit instruments and all costs of collection, including attorney fees and court costs.

Warning: For the purpose of applicable law, a credit instrument is identical to a personal check and may be deposited in or presented to a bank or other financial institution on which the credit instrument is drawn. Willfully drawing or passing a credit instrument with the intent to defraud, including knowing that there are insufficient funds in the account upon which it may be drawn, is a crime under federal and Tribal law which may result in criminal prosecution in addition to civil proceedings to collect the outstanding debt.

DOWNSTREAM CASINO RESORT ENDORSES RESPONSIBLE GAMING. We will cancel or reduce your credit line upon your request. If you or anyone you know may have a problem gaming responsibly, please call 1-800-522-4700.

Guest Signature ________________ Print Name ________________ Date ________________

Casino Employee ________________ Badge # ________________ Date ________________

APPROVAL BLOCK: Requested Amount ________________

Approver ________________	Date ________________	Amount ________________
Approver ________________	Date ________________	Amount ________________
Approver ________________	Date ________________	Amount ________________
Approver ________________	Date ________________	Amount ________________

ACCOUNT NUMBER

NAME

DATE	CASHIER'S INITIAL AND #	MARKER AMOUNT	PAYMENT AMOUNT	TOTAL
			< >	

SP20581

Safe Keeping
Deposit

Downstream Casino Resort

Date:	03/19/2010 16:01:47
Acct. Date:	03/19/2010
Doc No:	110000011
Cashier:	Shannon Tarvin

Player ID: 1431
MICKEY MOUSE
8675309
JOPLIN, MO 64801

Description	Amt
1100	$1
Total Deposit	$1
Safe Keeping Balance	$1

Player: MICKEY MOUSE

Cashier: Shannon Tarvin

MP0110000011

Withdrawal (S
Withdrawal

Downstream Casino Resort

Date:	03/19/2010 16:06:58
Acct. Date:	03/19/2010
Doc No:	130000013
Cashier:	Shannon Tarvin

Player ID: 1431
MICKEY MOUSE
8675309
JOPLIN, MO 64801

Description	
1100	
Total Withdraw	
Safe Keeping Balance	

Player: MICKEY MOUSE

Cashier: Shannon Tarvin

MP0130000013

PAYROLL	Policy No: 6320.08.02	Issue Date: 8/5/2010 Revised Date: 11/1/2010
PURPOSE: To establish policy and procedures for specific general payroll procedures and submissions.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
Compliance Review	6/30/2010
QTGA Submission	7/8/2010
QTGA Return	7/21/2010
Compliance Review	7/28/2010
QTGA Submission	7/29/2010
GM Approval	7/30/2010
QTGA Approval	8/5/2010
DDA Final Approval	8/12/2010
Compliance Review	11/1/2010
QTGA Submission	11/4/2010
GM Approval	Pending
QTGA Approval	Pending
DDA Final Approval	Pending

Contents

POLICY

The Payroll Policies and Procedures Manual specifies general payroll procedures and submission requirements. The manual is organized as follows:

1. Chapter 1 details the general requirements for submitting a payroll.
2. Chapter 2 discusses general provisions for payment requirements.
3. Chapter 3 discusses deduction requirements.
4. Chapter 4 discusses the payroll process requirements.
5. Chapter 5 discusses other payroll responsibilities.

Chapter 1- General Payroll Requirements

Overview

1. The General Payroll Requirements chapter discusses general guidelines for the following:
   a. Payroll Processing Date.
   b. Payroll Discrepancy.
   c. Termination Checks.
   d. Payroll Documentation.

Payroll Processing Date

1. The pay date is every other Thursday. The payroll is finalized on the Tuesday prior to the pay date. This meets the 48 hour banking requirement for direct deposits. To allow for adequate processing time, the time cards and tip sheets must be approved by 2:00pm on Friday prior to the pay date.

Payroll Discrepancy

1. A department may submit a payroll discrepancy request to correct an underpayment of compensation. The Team Member’s supervisor must complete and approve the check request form and attach the required documentation to be processed. A manual check will be processed in a timely manner for the discrepancy. If the correction is under $100.00 or less than 8 hours, the compensation will be added to the next pay period. All

discrepancies over $100.00 must be signed by the payroll department and the Accounting Manager or above before processing.

Termination Checks

1. When a Team Member has been terminated, HR (Human Resources) will provide a copy of the employment separation form to the payroll department. Upon receipt of this document, the direct deposit will be disconnected. Under special circumstances, at the discretion of the Department Director or CFO, the direct deposit may remain in effect for a specific extended period of time – i.e., 30 days due to relocation, severance pay, etc. HR will notify payroll of any outstanding items to be deducted from the final paycheck and any severance pay terms if applicable. The final check will be processed with the next payroll transmission. The check will not be mailed until the Team Member has satisfied the exit requirements of the HR department. If a terminated Team Member needs previous payroll information, the Team Member must submit a written request to payroll.

Payroll Documentation

1. The payroll department will maintain the supporting documentation for Team Member files that include:

    a. Wage Garnishment documentation from State Agencies.

    b. PTO forms for sell back. The forms have to be approved by the Team Member's supervisor.

    c. HR disciplinary action documentation that result in pay adjustments.

    d. HR status change forms for terminations.

Chapter 2- General Provisions

Overview

1. The General Provisions chapter discusses general guidelines for the following:

    a. Earned Income Credit Payment, Advanced.

    b. Holidays Worked.

    c. PTO Payout for Terminated Team Members.

    d. Overtime.

e. Bereavement Leave.

f. Severance Pay.

g. PTO Sellback.

h. Jury Duty.

Earned Income Credit Payment, Advanced

1. A Team Member may be entitled to receive advanced earned income credit (EIC) payments with his or her compensation during the year. The Team Member must provide a properly completed Form W-5, *Earned Income Credit Advance Payment Certificate*. An employer must make advance EIC payments to an eligible Team Member. The form is effective until the end of the calendar year unless the Team Member revokes it or files another one. A Team Member must file a new form each calendar year to comply with the maximum that is published in *Circular E, Employer's Tax Guide*.

Holidays Worked

1. When an hourly non-exempt Team Member works on the following holidays, they will receive 1.5 times their regular hourly rate. If a Team Member doesn't work on that day, there will be no compensation.

    a. **Holidays are:**

        i. New Year's Day.

        ii. Memorial Day.

        iii. Independence Day.

        iv. Labor Day.

        v. Native American Day.

        vi. Veterans Day.

        vii. Thanksgiving Day.

        viii. Christmas Day.

PTO Payout for Terminated Team Members

1. PTO accrual balances will be paid if a terminated Team Member has met the 90 day requirement prior to termination based upon audit report run at that time. A lump sum payment of accrued PTO time is subject to federal income tax withholding and withholding under the Federal Insurance Contributions Act.

Overtime

1. An hourly non-exempt Team Member is entitled to compensation for overtime as provided by law. Team Members will be paid at the rate of one and one-half times their regular hourly rate for work in excess of 40 hours per week. When PTO hours are taken during a work week, these hours will not be included as hours worked in computing the number of overtime hours.

Bereavement Leave

1. Forms for bereavement leave must be submitted to payroll by the end of the pay period. The forms must be signed by the Team Member's supervisor verifying that the HR requirements have been satisfied. The required documentation has to be attached before leave can be processed. The maximum amount that can be used is 3 days. Hours posted should be equivalent to the Team Member's shift schedule. The 90 day requirement does not apply to this leave.

Severance Pay

1. According to HR guidelines, severance pay may be issued every two weeks until the amount is completely distributed or it may be paid in one lump sum.

PTO Sellback

1. Team Members can sell back PTO time based on audit report run at that time. The Team Member's supervisor must approve each PTO request to verify the HR requirements have been met. The hours will be paid as a separate check.

Jury Duty

1. The Team Member's pay will need to be adjusted when serving on jury duty. Payroll will need a copy of the court compensation paid to the Team Member. The difference between the Team Member pay rate and the court compensation will be adjusted on the pay check for the days of service.

Chapter 3 – Deductions

Overview

1. The following is a list of deductions, some of which are required by law:

    a. Cafeteria plan contributions.

    b. Child Support Payments.

    c. Excess payment of compensation, recoupment of.

    d. Extra federal or state income tax withholding.

    e. Federal income tax withholding from wages.

    f. State Income Tax Withholding.

    g. Federal Insurance Contributions Act Withholding (for Social Security and Medicare).

    h. Loan repayment (Section 401(k) deferred compensation plan).

    i. Levies from the Internal Revenue Service.

Cafeteria Plans Contributions

1. The Human Resources Department administers and maintains a cafeteria plan in which most Team Members may participate. The AFLAC insurance and FLEX spending accounts are examples of these plans that require a payroll deduction to meet the required payments.

Child Support Payments

1. An administrative writ of withholding issued by a court to deduct child support payments will be honored after the HR department has reviewed and calculated the amount. Upon HR authorization, the child support will be deducted from the Team Member's check and forwarded to the issuing support payment center each pay period.

Excess Payment of Compensation, Recouping

1. An overpayment of compensation to a Team Member may be recouped by deducting that amount from future pay checks. If a Team Member terminates employment before the company has fully recouped an overpayment of compensation from the Team

Member, then the company may deduct the outstanding amount of the overpayment from any lump sum payment of accrued PTO leave due to the Team Member.

Extra Federal or State Income Tax Withholding

1. An employer must honor a Team Member's request to withhold more federal or state income tax than would otherwise be withheld under a given combination of income and exemptions. The extra withholding is a sum-certain amount, i.e., it is not an extra exemption. The Team Member may change his/her withholdings at any time using the self-service portal on line or by completing a Form W-4 and turning it in at the Payroll window.

Federal Income Tax Withholding from Wages

1. An employer must deduct federal income tax (FIT) from the "wages" of a Team Member in accordance with the tables or computational procedures prescribed by the Secretary of the Treasury.

State Income Tax Withholding

1. A Team Member who lives or works outside Oklahoma may be subject to state income tax withholding under the laws of the state in which the Team Member lives or works. The casino is only required to file for a state tax ID number for the state in which the business is located, and to withhold state income tax for that state.

Federal Insurance Contributions Act Withholding (for Social Security and Medicare)

1. The Federal Insurance Contributions Act (FICA) requires an employment tax be withheld from the wages of any Team Member. The withholding rate per year is 6.20% in accordance with Federal law of wages for old age, survivors, and disability insurance (popularly known as social security). The withholding rate 1.45% of wages for hospital insurance (popularly known as Medicare). These rates will remain in effect for all subsequent years unless changed by congress.

Loan Repayment (Section 401(k) Deferred Compensation Plan)

1. A participant in the 401(k) deferred compensation plan may receive a loan from the plan under certain circumstances and if certain procedures are followed. The participant must repay the loan through payroll deduction.

Chapter 4 – Payroll Process

Pre-Processing

1. Update Team Member Information.

2. Post hours in timekeeper for PTO sellback, termination payouts, and bereavements.

3. Setup or modify child support payments, rental property and property utilities deductions, jury duty, Team Member service deductions, perfect attendance compensation, shoe deductions, QTGA licensing fees, and any other payroll deductions needed.

4. Create batches to process insurance adjustments and payroll discrepancies.

5. Post pooled and individual tips.

6. Run the benefit plan calculation. This step ensures that all deduction/compensation amounts linked to benefit plans are up-to-date.

Processing

1. Test time clock entries for errors and transfer payroll data from time clock payroll.

2. Process batch transactions and review reports.

3. Calculate trial payroll and send to Accounting Manager or above for review.

4. Balance General Ledger output.

5. Finalize payroll when Accounting Manager or above has approved and verbally authorized transaction. (Payroll will be finalized two calendar days before the pay date in order to meet the 48 hour banking requirement for direct deposits.)

6. Print checks/advices.

7. Create Direct Deposit ACH File.

8. File Tax Deposits.

9. Request garnishment payments from Accounts Payable.

Tax Remittance Procedures

1. Payroll will be processed two days before pay date.

2. Tax payments will be made by EFTPS. Payment will be initiated at least one calendar day before the tax due date.

3. Payroll will compare and verify the tax due totals to the general ledger liability account.

4. One calendar day before the due date, Federal withholding, Social Security and Medicare taxes will be paid on line by Accounts Payable. State withholding taxes will be paid on line by Payroll. Payroll will submit the 941 report within 30 days after the end of each quarter. Payroll will file the State Withholding Tax report on line each month. Receipts will be forwarded between the departments.

5. The State Unemployment Insurance (SUI) taxes are due 30 days after the end of each quarter. Payroll will generate the Quarterly report and pay online any taxes due at that time. Receipts will be forwarded to Accounts Payable for booking.

IRS (2010) Circular E Requirements:

1. Employers are responsible for ensuring tax returns are filed and deposits and payments are made. The following list designates the IRS requirement listed in the Publication 15 (2010), (Circular E), Employer's tax guide.

    a. By January 31:

        i. Furnish each Team Member a completed W-2 form. ***Starting January 25, 2010, the Union Security Insurance Company will prepare and distribute the disability W-2 forms for third party sick pay benefits that are paid to the Team Members.*** File Form 941 for the fourth quarter of the previous year; ***if you have timely deposited all taxes when due, you have 10 additional calendar days from the due date to file the return.*** File Form 944 for the previous calendar year instead of Form 941 if the IRS has notified you in writing to file Form 944. Federal Unemployment Tax Act (FUTA) Exempt- Tribal enterprises can elect to pay State Unemployment Tax Act (SUTA) taxes instead of FUTA taxes.

    b. By February 15:

        i. Request a new Form W-4 from exempt Team Members who claimed exemption from income tax withholding last year.

    c. By February 16:

        i. Exempt Forms W-4 expire and if the Team Member does not give you a new Form W-4, withhold tax as if he or she is single, with zero withholding allowances.

    d. By February 28:

i. File paper Forms W-2 and W-3. File Copy A of all paper Forms W-2 with Form W-3, Transmittal of Wage Tax Statements, with the Social Security Administration (SSA). For electronically filed returns***, see By March 31**.*

e. By March 31:

i. File electronic forms W-2. File electronic forms W-2 with the SSA. For information on reporting W-2 information the SSA electronically, visit the Social Security Administration's Employer W-2 Filing instructions information webpage at www.socialsecurity.gov/employer.

f. By April 30, July 31, October 31, and January 31

i. File Form 941; ***if you have timely deposited all taxes when due, you have 10 additional days from the due dates to file the return.***

g. Before December 1:

i. New Forms W-4. Remind Team Member to submit a new W-4 if their withholdings have changed or will change to the next year.

h. On December 31:

i. Form W-5 expires. Earned Income Credit Advance Payment Certificate, expires each year on December 31. Eligible Team Members that want to receive advance payments of the earned income credit next year must give payroll a new Form W-5.

IRS Requirements for Recordkeeping

1. Keep all records of employment taxes for at least 4 years. These should be available for IRS review. Records should include:

   a. Employer identification number.

   b. Amounts and dates of all wage, annuity, and pension payments.

   c. Amount of tips reported by the Team Members.

   d. Records of allocated tips.

   e. Names, addresses, social security numbers, and occupations of Team Members and recipients.

f. Any Team Member copies of forms W-2 and W-2c returned to as undeliverable.

g. Dates of employment for each Team Member.

h. Periods for which Team Members and recipients were paid while absent due to sickness or injury and the amount and weekly rate of payment made by Union Security Insurance Company.

i. Copies of Team Member's and recipients' income tax withholding allowance certificates (Forms W-4, W-4P, W-4 (SP), W-4S and W-4V)

j. Copies of Team Members' Earned Income Credit Advance Payment Certificates (Forms W-5 and W-5 (SP)).

k. Dates and amounts of tax deposits made and acknowledgment numbers for deposits made by EFTPS

l. Copies of returns filed, including 941 TeleFile Tax Records (discontinued after June 2005) and confirmation numbers.

m. Records of fringe benefits and expense reimbursements provided to the Team Members, including substantiation.

Chapter 5 – Other Payroll Responsibilities

1. The payroll department is also responsible for:

    a. Providing income verifications to various governmental agencies and financial institutions for Team Members applying for loans, housing programs, child care programs, and DHS assistance.

    b. Providing financial information for unemployment fraud investigation.

    c. Hours report for Team Members' 401 K eligibility.

    d. Hours report for Team Members' 401 K terminations.

    e. Financial information for workman's comp claims.

    f. Maintenance of Team Members' payroll files.

POKER ROOM TOURNAMENT BAD BEAT PROGRESSIVE JACKPOT PROMOTION	Policy No: 1105.10.01	Issue Date: 8/5/2010
PURPOSE: To establish procedures for the Bad Beat Progressive Jackpot Promotion for Poker Room Tournaments.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
Compliance Review	3/17/2010
QTGA Submission	3/25/2010
QTGA Return	4/8/2010
Compliance Review	5/26/2010
QTGA Submission	5/27/2010
QTGA Return	6/3/2010
Compliance Review	6/11/2010
QTGA Submission	6/17/2010
QTGA Return	7/1/2010
Compliance Review	7/2/2010
QTGA Submission	7/8/2010
QTGA Return	7/21/2010
Compliance Review	7/26/2010
QTGA Submission	7/29/2010
GM Approval	7/28/2010
QTGA Final Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

1. All funds contributed by the patrons into the Tournament Bad Beat Progressive pool shall be returned when won in accordance with the posted rules with no commission or administrative fee withheld.

2. Rules governing the Tournament Bad Beat Progressive Jackpot Promotion will be conspicuously posted and brochures explaining the rules will be available to any patron.

TOURNAMENT BAD BEAT PROGRESSIVE JACKPOT RULES

1. Jackpot totals will be updated and posted on a daily basis.

2. Any Texas Hold'em Tournament games for which a jackpot donation is charged will be eligible for the Tournament Bad Beat Progressive Jackpot.

   a. Sit-N-Go tournaments shall not have a tournament fee charged and will not be eligible for the Tournament Bad Beat Progressive Jackpot.

3. A tournament jackpot fee of $3.00 will be charged to each tournament entrant upon registration to an eligible tournament.

   a. The jackpot fee shall be collected by the Poker Cashier at time of entry into any jackpot eligible tournament.

   b. Special events, such as televised tournament events, will be ineligible for the Tournament Bad Beat Progressive Promotion. Notice of an event's jackpot eligibility status will be conspicuously posted and announced prior the special event taking place.

4. All winners must be 18 years old and have valid issued identification, such as any of the following:

   a. Valid US State drivers license

   b. US State-issued identity card

   c. US Military issued identity card

   d. US Government issued identity card

   e. Valid US Passport

   See Universal ID Acceptance Policy #6320.15.01 for additional information on acceptable identity cards.

5. Distribution of jackpot funds will be as follows:

   a. 65% to the main jackpot

   b. 25% to the primary backup jackpot

   c. 10% to the secondary backup jackpot

6. A Tournament Bad Beat Jackpot is a payout that occurs when four deuces (2's) or a better hand loses to a higher hand. To be eligible:

   a. The winning and losing hands must use both hole (down) cards (see Page 2 of Poker Manual for definitions of hole and down cards).

    b. Any four-of-a-kind must be made from a pocket pair.

7. Only the two best hands may qualify for the Tournament Bad Beat Jackpot Promotion. Any hand that is four deuces or better and loses but is not one of the two best hands at the showdown will only receive a patrons' share of the Tournament Bad Beat Jackpot.

8. Downstream Casino Resort (DCR) Management reserves the right to change the eligible jackpot hand. Notice will be provided to the Quapaw Tribal Gaming Agency (QTGA) and posted conspicuously in the Poker Room.

9. Patrons must play their hands independently. Any discussion of the jackpot during the play of the hand may void qualification for the prize. If any patron, whether directly or indirectly involved in the hand, passes information or instructs another patron on how to act or reveals his/her hand to other patrons, the Tournament Bad Beat will be disqualified. This is communicated to the Patrons in the Tournament Bad Beat rules.

10. When the Tournament Bad Beat Jackpot is hit, the tournament clock will be stopped and play will be suspended until all information regarding the jackpot award is obtained and verified.

11. DCR Management reserves the right to verify eligibility of all qualifying hands. However, there will be no recourse if the cards are mucked (discarded) before surveillance is able to verify the hands and the community cards. Poker Management will not be permitted to reconstruct the hands in any way.

12. Payouts are as follows:

    a. **2 players: 65%** will be awarded to the losing hand and **35%** to the winning hand.

    b. **3 players: 60%** will be awarded to the losing hand, **30%** to the winning hand and **10%** to the **3rd** player in the hand.

    c. **4 players: 55%** will be awarded to the losing hand, **25%** to the winning hand and **20%** divided equally among the other **2** players.

    d. **5 - 9 players: 45%** will be awarded to the losing hand, **25%** to the winning hand and **30%** divided equally among the **remaining** players.

    e. **10 or more players: 40%** will be awarded to the losing hand, **20%** will be awarded to the winning hand and **40%** divided equally among the **remaining** players.

13. Progressive jackpot collection shall be charged as part of the buy-in to a tournament. This shall be a one-time fee for one entire tournament, regardless of tournament duration. Because the chips in play have no monetary value (they are worth only a certain number of

points), and DCR receives a fee for tournament buy in, the tournament pot will not be raked. Rake is defined as the amount of gaming chips collected by the dealer as poker revenue.

14. There shall be no rules governing the amount of patrons that must be dealt in because:

    a. To determine a tournament winner, play may continue until only two patrons are contending for first place.

    b. Also, chips stacks are considered live, meaning that the chips belong to a patron not yet eliminated from the tournament, and shall be dealt to whether or not the patron is present.

15. Finance Department shall record the counts and the payouts of the daily jackpot amounts on a Tournament Bad Beat count sheet, a copy of which shall be provided to the Poker Department daily and to the QTGA upon request.

16. Jackpot totals shall be posted conspicuously in the poker room on a 24 hour basis and must be in full view of a surveillance camera dedicated to viewing of the posted jackpot totals.

17. Jackpot totals must be posted in the poker room after a jackpot has been hit and on a daily basis in accordance with the posted rules.

18. When a Tournament Bad Beat Progressive Jackpot occurs and is paid out, the primary backup jackpot amount will become the new and current main jackpot amount, the secondary backup jackpot amount will become the primary backup jackpot amount, and the secondary jackpot amount will be reset.

19. The reset figure for the Tournament Bad Beat Progressive will be $1,000. When monies accrued in the main jackpot fund or either of the backup funds exceeds this figure, then those jackpot funds will be eligible to be increased.

20. Any interest earned on a progressive jackpot balance shall be credited and posted to the Bad Beat Progressive Jackpot Fund. The following rules will govern the Jackpot Fund Log:

    a. A jackpot fund log (pg. 7) shall be maintained by Income Audit. A representative of Income Audit shall record the amount of each jackpot fund liability sign or meter on a daily basis.

    b. The jackpot fund log shall be forwarded to QTGA at least once a month, and whenever a bad beat jackpot is awarded. When this log is forwarded, accounting shall reconcile the bad beat jackpot liability to the amount shown on the jackpot fund log and the amount displayed on the jackpot signs or meters in the poker room.

c. The total of the bad beat jackpot amounts awarded per the payout forms for each patron must agree to the jackpot liability as recorded in the Jackpot Fund Log. Any variance must be investigated by the Finance Department and the outcome documented with a notation on the Jackpot Fund Log. The Finance Department representative will initial and include badge number on the Jackpot Fund Log.

21. The following rules will govern unclaimed jackpots:

    a. In the event that a patron does not or cannot claim a jackpot when it is hit, the money will remain in the Main Cage until it is claimed by the patron.

    b. Patrons will be informed that the money will be held up to 1 month from the time of the jackpot as safekeeping in the cage. (See Patron Safekeeping Policies #1400.09.01 (Patron Deposits - Front Money/Safekeeping), and 1400.10.01 (Patron Withdrawals - Front Money/Safekeeping).

    c. If the patron does not claim the jackpot within 1 month of the occurrence, the money will be returned to the Bad Beat Progressive Jackpot Fund.

22. All jackpots are to be paid out in DCR cash value casino chips with the intention of enhancing action in all areas of the casino and extending play in the poker games.

23. Regarding the presence of DCR Team Members or other persons ineligible for the Bad Beat Progressive Jackpot:

    a. No ineligible patron shall be charged the tournament fee as part of the entry fee or buy-in.

    b. If any ineligible patron has a hand that results in the occurrence of Bad Beat Progressive Jackpot, the monies that would have been paid out if the patron was eligible will be added to the Primary Backup Jackpot and will not be paid out in any way to the winners of the Main Jackpot.

24. The following procedure will be used for the payout of the Tournament Bad Beat Progressive Jackpot in the poker room:

    a. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty, Surveillance, and QTGA will immediately be notified of a qualifying Tournament Bad Beat occurrence.

    b. Any poker hand that triggers a poker jackpot must conform to the posted Tournament Bad Beat Progressive Jackpot Rules in order for a win to be declared.

c. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty and the Poker Dealer must physically verify the validity of the jackpot, checking the composition of the deck and the dollar amount of the jackpot.

d. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty must call surveillance to request photo stills of the table the jackpot occurred at, the community cards and qualifying hands, as well as stills of all active tables and the amounts on the Bad Beat Progressive Jackpot sign.

e. Copies of all relevant photo stills shall be furnished to QTGA and to the Poker Department upon request.

f. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty, and a representative of QTGA will then proceed to surveillance to review the qualifying hand. This review will occur prior to any payout of the jackpot.

g. Surveillance shall store for three years the video playback of the qualifying hand.

h. Upon consensus that the qualifying hand is a legitimate Tournament Bad Beat, the cards are verified at the table and removed from the game and provided to QTGA for inspection. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty shall also inspect the cards to ensure tampering did not occur, thus payment of the prize to the eligible patron shall be made without waiting for the results of QTGA's inspection. Proper ID must be obtained from all patrons eligible for payouts from the Bad Beat Progressive Jackpot before payment of the prize.

i. Casino Cage will prepare the Poker Room Jackpot Fund Payout Sheet for each patron receiving a payout from the Bad Beat Progressive Jackpot, and will as applicable complete and issue form 1099 or W2-G to winning patrons; update the W2-G logs; complete MTL's and CRTC's if appropriate; and prepare any other documentation as may be required to meet cage accountability standards. All patrons receiving awards from the Bad Beat Progressive Jackpot will complete and sign a W-9.

j. The Poker Manager, Poker Shift Manager, or DCR Manager on Duty, a Cage Supervisor, a Security officer, and a member of QTGA shall witness the jackpot payment. All winning patrons must sign the jackpot payout form (pg. 8) to evidence receipt of the payout at the time of payment.

NAME	NAME		SS#	ADDRESS	CITY	State	Zip Code	AMOUNT WON	PLAYERS CARD #		PROMOTION	DATE	TIME
								2825			Royal Flush	1:16AM	1/2/2010
								2809			Royal Flush	12:25AM	1/3/2010
								2767			Royal Flush		1/4/2010
								2900			Royal Flush		1/14/2010
								2842			Royal Flush	3:00AM	1/15/2010
								3003			Royal Flush	7:30PM	1/23/2010
								3074			Royal Flush	11:46AM	1/29/2010
								3031			Royal Flush	2:39PM	1/30/2010
								2970			Royal Flush	4:00PM	1/30/2010
								3064			Royal Flush	4:23PM	2/5/2010
								6005			Royal Flush	9:33PM	2/5/2010
								2883			Royal Flush	6:31AM	2/7/2010
								6001			Royal Flush	3:10AM	2/13/2010
								3003			Royal Flush	1:23AM	2/20/2010
								3064			Royal Flush		2/21/2010
								3058			Royal Flush		

DOWNSTREAM
CASINO·RESORT

1532

Poker Room Tournament
PAID OUT

Date:____________________Time:____________

Amount $____________ Type: ☐ Cash ☐ Chips

Patron Name:__________________________
(Please print name)

Q Card # __________________________

Patron Sig. __________________________

Cashier Sig./ID# ______________________

White - Poker Room Yellow - Patron Pink - Book

SP 20152

PROCESSING COUPONS	**Policy No:** 1400.14.01	**Issue Date:** 8/4/2010
PURPOSE: To establish policy and procedures that outline how Cage Cashiers are to process coupons and maintain accountability for the funds of Downstream Casino Resort.		

DCR Compliance – ITEM Tracking	**Date**
Issue Date	8/4/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	3/19/2010
QTGA Submission	3/25/2010
QTGA Return	4/8/2010
Compliance Review	4/29/2010
QTGA Submission	5/6/2010
QTGA Return	5/13/2010
Compliance Review	6/3/2010
QTGA Submission	6/3/2010
QTGA Return	6/18/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/23/2010
Compliance Review	7/26/2010
QTGA Submission	7/29/2010
QTGA Final Approval	8/4/2010
GM Approval	7/28/2010
DDA Final Approval	8/12/2010

POLICY

1. The patron shall receive a coupon through the mail to be redeemed for Table Games chips at the Main Cashier's Cage. All coupon mailers shall require prior Quapaw Tribal Gaming Agency (QTGA) approval before being mailed to the patrons.

PROCEDURE

1. After the Patron presents the coupon, the Cage Cashier shall:

    a. Request the Patron's Identification. Types of Identification accepted at Downstream Casino Resort (DCR) are:

        i. Valid US State Issued Driver's License

        ii. Valid US State issued ID cards

iii. US Military ID cards

iv. Government issued Driver's License

v. US Passports (See Universal ID Policy #6320.15.01)

b. Request that the patron sign the front of the coupon.

c. Initial, with badge number, the top of the coupon in the upper right hand corner.

d. Time stamp the back of the coupon.

e. Stamp the coupon paid.

f. Pay the coupon in chips (only).

g. Place coupon in Cage Cashier's bank.

2. The Cage Cashier shall calculate the total and amount of all coupons paid during the shift and use as a balancing tool. This shall be done at the end of the Cage Cashier's shift.

3. All coupons are sent to the Main Bank at the end of each Cage Cashier's shift with the cash drawer balance and later forwarded to Accounting with the end of shift Main Bank paperwork.

PROMOTION SUBMISSIONS PROCEDURES	Policy No: 6230.04.01	Issue Date: 7/28/2010
PURPOSE: To establish policies 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

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).

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.
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 and detailed evidence of tax reporting value.

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.

11. Any other 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. Promotion documentation information as noted above.

    b. Document requests for any controlled form, with delivery requirement.

    c. Final drafts of any controlled marketing materials.

    d. Conceptual drafts of any marketing collateral, terms and conditions, or other related materials.

    e. Standard pre-forma as applicable.

4. All promotion submissions must include at least the following signatures prior to submission to the QTGA:

    a. Marketing Department Director or above, once DCR Compliance Department does a preliminary review of the submission.

b. DCR Compliance Department, prior to General Manager submission.

c. General Manager, prior to QTGA submission.

d. QTGA Director or designee, attesting to approval.

e. All submissions must be presented by the DCR Compliance Department to QTGA.

Approval

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:

1. QTGA Director
2. QTGA Compliance Manager
3. DCR Director of Marketing
4. DCR Director of Finance
5. DCR Promotions Supervisor
6. DCR Department Directors as applicable

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.

Quapaw Tribal Gaming Agency

- ☐ *Downstream*
- ☐ *Quapaw*
- ☐ *Global*

Date Rcvd	
Comments	
Approved ☐	Not Approved ☐

MARKETING EVENT REVIEW FORM

Promotion Name:	***Date of Submission:***	***Marketing Start Date:***
Sponsoring Department:		***Promotion Date:***
Criteria/Target Audience:	***Event Type:*** ☐ ***Promotional Drawing*** ☐ ***Direct Mail*** ☐ ***Promotional Event*** ☐ ***Internal Event*** ☐ ***External Event*** ☐ ***Concert or Production*** ☐ ***Other*** ________________	***Prize Structure/Offer:***
Advertising Methods: ☐ ***TV*** ☐ ***Radio*** ☐ ***Media*** ☐ ***Billboard*** ☐ ***Direct Mail*** ☐ ***Other***		***Funding Source:*** ☐ ***Cash Option Value:*** _______ ☐ ***Promotional Item Value:*** ____________________________
Summary of Event:		
Attachments:		

DCR Marketing Authorization:

Signature and Badge Number:____ **Date:**_______________

Quapaw Authorization:

Signature and Badge Number:____ **Date:**_______________

DCR Compliance Authorization:

Signature and Badge Number:____ **Date:**_______________

General Manager Authorization:

Signature and Badge Number:____ **Date:**_______________

QTGA Authorization:

Signature and Badge Number:____ **Date:**_______________

TABLE CREDITS	**Policy No:** **1400.32.03**	**Issue Date:** 8/9/2010 **Revised Date:** 9/17/2010
PURPOSE: To establish policy and procedures for Table Games Credits in the Cage area.		

DCR Compliance – ITEM Tracking	**Date**
Issue Date	8/9/2010
Compliance Review	2/1/2009
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	3/19/2010
QTGA Submission	3/25/2010
QTGA Return	4/20/2010
Compliance Review	4/20/2010
QTGA Submission	4/22/2010
QTGA Return	4/29/2010
Compliance Review	4/30/2010
QTGA Submission	5/6/2010
QTGA Final Approval	5/13/2010
GM Approval	5/4/2010
DDA Final Approval	5/14/2010
Compliance Revision to Final	5/21/2010
QTGA Submission	5/21/2010
QTGA Return	6/3/2010
Compliance Review	6/3/2010
QTGA Submission	6/4/2010
QTGA Return	6/18/2010
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/28/2010
Compliance Review	7/30/2010
QTGA Submission	8/5/2010
GM Approval	8/5/2010
QTGA Final Approval	8/9/2010
DDA Final Approval	8/12/2010
Compliance Review	9/14/2010
QTGA Submission	9/16/2010
GM Approval	9/16/2010
QTGA Approval	9/17/2010
DDA Final Approval	9/21/2010

POLICY

1. A CREDIT is a removal of Casino chips from the gaming tables to the Main Bank Cage.

2. A computer requested CREDIT is generated in the Table Games area of Downstream Casino Resort by a Table Games Supervisor or above. A three part form is generated from the computer system and prints automatically in the Main Bank. There is also a "copy" that stays on the computer screen in the Main Bank until the Main Bank Cashier accepts the credit.

PROCESSING A TABLE GAMES CREDIT IN THE MAIN BANK

1. The request for a credit prints in the Main Bank (pg. 4).

2. The Cage Cashier, Main Bank Cashier, Cage Shift Supervisor or above tears off the credit slip.

3. The Main Bank Cashier determines the number of racks needed for the credit.

4. Security dispatch is notified of the need for a credit back from the gaming tables.

5. Upon arrival of a Security Officer, the three part credit slip is placed on the counter on the marked off area of the Main Bank for Surveillance review.

6. All credits are called in to Surveillance before the Security Officer is sent out to the table. Surveillance is told the Pit number, the table number and the total amount of the credit/chips.

7. After Surveillance has been notified, the Cashier shall tear off the pink copy of the credit slip and maintain it at the Main Bank for verification purposes.

8. The Cashier shall place the empty chip racks and the white and yellow copies of the credit slip into a birdcage and the Security Officer will take the birdcage to the Table games area to pick up the credit.

9. The Dealer and the Table Games Supervisor or above will display the credit (chips) on the table for the Security Officer and sign both the white and yellow copies of the credit slip with their names and badge numbers.

10. The Security Officer will review the white and yellow copies of the credit slip for accuracy and sign both with their name and badge number.

11. The credit (chips) shall be placed into the birdcage.

12. The yellow copy of the credit slip is dropped by the Table Games Dealer in the Table Games locked drop box.

13. The Security Officer shall notify Surveillance that the credit is in the birdcage and is coming in from table number and pit number and will be taken to the Main Bank.

14. The Security Officer transports the white copy of the credit slip and the chips in the birdcage to the Main bank. The control series (computer copy) remains in the computer until accepted. Once accepted, it rolls into audit status.

15. The Main Bank Cashier will place the chips on the counter, break each denomination down for the Surveillance camera, place the white copy of the credit slip on the marked off surveillance area and call Surveillance.

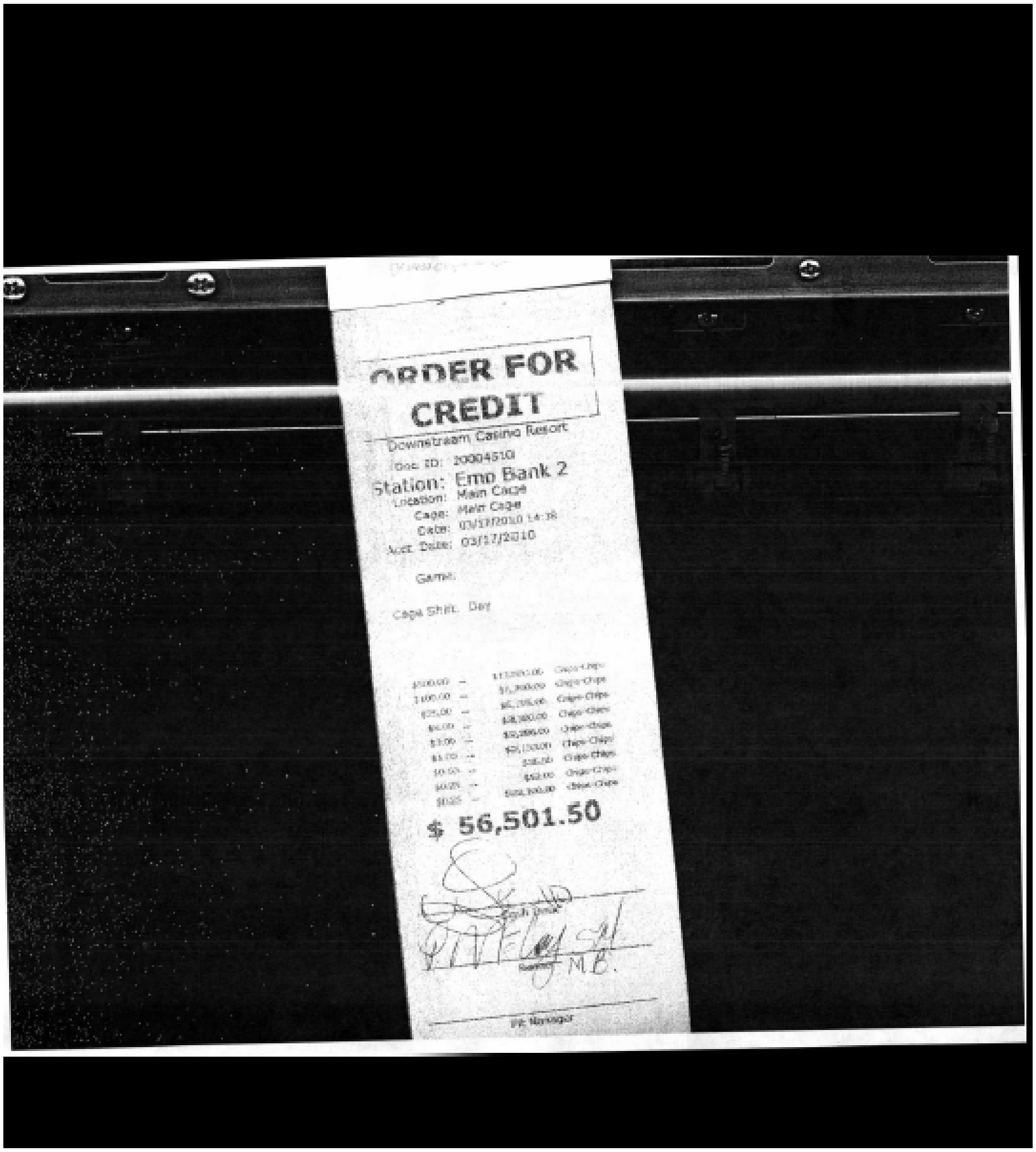
16. Once Surveillance agrees, the Main Bank Cashier will sign the white copy of the credit slip with their name and badge number and put the chips back into inventory.

17. The Main Bank Cashier shall compare the pink copy of the credit slip to the white copy to ensure the original table credit amount was received.

18. The Main Bank Cashier will go to the Cage and Table Accounting (CTA) system and click on the "CREDIT NUMBER SUBMITTED". A new screen will appear and the Main Bank Cashier will click on "ACCEPT".

19. The white copy of the credit slip is then used for balancing purposes and later forwarded along with the pink copy to Income Audit with the end of shift paperwork.

Example of Credit Slip



ORDER FOR CREDIT

Downstream Casino Resort

Doc ID: 20004510

Station: Emp Bank 2

Location: Main Cage

Cage: Main Cage

Date: 03/17/2010 14:38

Acct Date: 03/17/2010

Game:

Cage Shift: Day

$ 56,501.50

Pit Manager

Three Card Poker	Policy No: 1100.28.01	Issue Date: 7/26/2010 Revised Date: 11/11/2009 7/23/2010
PURPOSE: Establishment of procedures for the conduct of Three Card Poker.		

DCR Compliance – ITEM Tracking	Date
Issue Date	7/26/2010
Compliance Revisions Made	11/11/2009
QTGA Submission	11/12/2009
QTGA Final Approval	11/13/2009
GM Approval	11/12/2009
Compliance Revisions to Final	7/23/2010
QTGA Submission	7/23/2010
QTGA Approval	7/26/2010
GM Approval of Revisions to Final	7/23/2010
DDA Final Approval	8/12/2010

Contents

OPENING AND CLOSING TABLE PROCEDURE

OPENING THE TABLE

1. After the Dealer arrives on their assigned game, the Pit Manager will retrieve the Lid Key and Shoe Box Key from the Pit Manager podium. The Pit Manager will unlock both the rack lid and the shoe box for the unopened game.

2. The Floor Supervisor will instruct the Dealer to pull the lid up from the chip rack. The Dealer will place the lid in the holder under the game.

3. The Floor Supervisor will take the opening count sheet from the tray and along with the Dealer verify that the number of chips in the rack match what is on the opening slip.

4. When both the Supervisor and Dealer are satisfied that the count matches, they will both sign the opening slip with their name and badge number and the dealer will drop the slip into the drop box. If the opening slip does not match the table rack, the Floor Supervisor will inform the Pit Manager.

CLOSING THE TABLE

1. After management makes a decision that a game is no longer needed for business purposes, the Pit Manager will inform the Dealer to "bring up their lid". The Dealer then will retrieve the lid from underneath the table and place it in the middle of the table. The dealer will drop in the drop box any ante amounts collected that are still in the rack.

2. The Floor Supervisor and Dealer will prepare a closing slip by counting all the chips in the table. The Floor Supervisor will mark on the closing slip the value amount of each denomination of chips. The Floor Supervisor and the Dealer then will sign the closing slip with name and badge number. Once the closing slip is complete, a Pit Manager will verify the closing slip to the table chip tray.

3. The Pit Manager will top sign the closing slip by placing his initials and badge number on the slip.

4. The Dealer will drop one copy of the closing slip into the drop box and a second copy will be placed into the chip tray.

DEFINITIONS

The following words and terms, when used shall have the following meanings unless the context clearly indicates otherwise:

1. "Ante wager" means the bet that a player may make prior to any cards being dealt in order to compete against the dealer's hand in a round of play.

2. "Hand" means the three-card poker hand that is held by each player and the dealer after the cards are dealt.

3. "Pair- plus" wager means the wager that a player is required to make prior to any cards being dealt in order to compete against a posted scale of payouts, regardless of the outcome of the player's hand against the dealer.

4. "Play wager" means an additional wager, equal in value to his or her ante that a player must make if the player opts to remain in competition against the dealer after the player reviews his or her hand.

5. "Round of play" means one complete cycle of play during which all wagers have been placed, all cards have been dealt and all remaining wagers have been paid off or collected in accordance with this subchapter.

6. "Stub" means the remaining portion of the deck after all cards in the round of play have been dealt or delivered.

7. "Suit" means one of the four categories of cards: clubs, diamonds, hearts, or spades.

CARDS: NUMBER OF DECKS

1. Except as provided in (2) below, Three Card Poker shall be played with one 52 card deck of cards with backs of the same color and design and one additional solid yellow or green card to be used in accordance with the procedures set forth in "*Shuffle of the Cards"*.

2. An automated card-shuffling device will be used at all Three Card Poker Tables. A second deck of cards will be used to play the game provided that:

    a. Each deck of cards complies with the requirements of (1) above.

    b. The backs of the cards in the two decks are of different color.

i. One deck is being shuffled by the automated card shuffling device while the other deck is being dealt or used to play the game.

ii. Both decks are continuously alternated in and out of play, with each deck being used for every other round of play; and

iii. The cards from only one deck shall be placed in the discard rack at any given time.

OPENING OF THE TABLE FOR GAMING

1. After receiving a new deck of cards at the table in accordance with house procedures, the Floor Supervisor shall inspect the deck to insure that all cards are accounted for, then the dealer shall inspect the cards.

2. The cards shall be turned face down on the table, mixed thoroughly by a "washing" of the cards and stacked. Once the cards have been stacked, they shall be shuffled in accordance with *"Shuffle of the Cards"* section described below.

3. All cards opened for use shall be changed at least once every four hours.

SHUFFLE OF THE CARDS – HAND SHUFFLE

1. When breaking in a new deck, the cards must be washed thoroughly. Bets must be taken off the betting areas to allow room to do this. If a deck is ever sorted, or partially sorted (i.e., when making premium payout to verify the deck), then same procedure must apply. In the event of a malfunction of the automatic shuffler, the dealer may be required to manually shuffle the cards until the shuffler can be repaired or replaced. To insure consistency of how we shuffle the cards, as well as a good random mix, the following procedures will be adhered to:

2. As the dealer is shuffling the deck every hand, it may not be necessary to call *"shuffle"* before shuffling each deck.

3. The shuffle is as follows:

    a. The deck will be riffled twice

    b. The deck will be stripped once (3 strips)

    c. The cards will be riffled once more

    d. The dealer cuts the deck once, in a forward motion, onto the cut card

4. Players ***NEVER*** cut the cards.

5. The dealer will always attempt to cut the deck as close to the middle as possible.

SHUFFLE OF THE CARDS – AUTOMATIC SHUFFLER

1. Immediately prior to the commencement of play and after each round of play has been completed, the dealer shall riffle the cards once then strip the cards three or four times prior to being placed in the automated card shuffling device so that the cards are randomly intermixed. Upon completion of the shuffle, the dealer or device shall place the deck of cards in a single stack; provided, however, that nothing in this section shall be deemed to prohibit the use of an automated card shuffling device which, upon completion of the shuffling of the cards, inserts the stack of cards directly into a dealing shoe.

2. After the cards have been shuffled and stacked, the dealer shall deal or deliver the cards in accordance with the procedures set forth in *"Procedures for Dealing the Cards from any Automated Dealing Shoe"* as described below.

DEAD GAME

1. On open tables which have gone dead, the dealer will spread the last deck in play and leave one in the discard rack.

2. When play resumes on the table, the dealer will pick up the deck on the table, riffle once, and insert the deck in the shuffler. Then, take the deck that is in the discard rack, riffle it once, and insert it into the shuffler.

PROCEDURES FOR DEALING THE CARDS FROM AN AUTOMATED DEALING SHOE

1. The cards to be used to play Three Card Poker will be dealt from an automated dealing shoe which dispenses cards in stacks of three cards.

2. When dealing the cards from the shuffler, the following requirements shall be observed:

    a. Once the "*Opening"* procedures have been completed, the cards shall be placed into the automated dealing shoe.

    b. The dealer shall then announce *"no more bets"* prior to the shoe dispensing any stacks of cards.

3. The dealer shall deliver the first stack of cards dispensed by the automated dealing shoe face down to the player farthest to his or her left who has placed a wager. As the remaining stacks are dispensed to the dealer by the automated dealing shoe, the dealer shall, moving clockwise around the table, deliver a stack face down to each player who has placed a wager. The dealer shall then deliver a stack of three cards face down to the designated spot for the placement of the dealer's cards.

4. After each stack of three cards has been dispensed and delivered in accordance with this subsection, the dealer shall remove the stub from the automated dealing shoe and except as provided in #5 (irregularities) below, place the cards in the discard rack without exposing the cards.

5. NOTE: When the dealer is delivering the stack of cards to the eligible player, the stack should be even with the "Pair Plus" betting circle. Once the dealer has dealt a stack to all eligible players and to the dealer, the stub should be removed from the automated dealing shoe and placed in the discard rack without exposing the cards. Once the stub has been placed in the discard rack, the dealer shall push each eligible player's stack back to the "Play" betting circle. Then, and only then, the player may look at their cards and act accordingly.

6. The shuffler contains a feature which counts each card in the deck and indicates whether or not fifty-two (52) cards are contained therein. The dealer shall observe the device to ensure there is an accurate count.

WAGERS

1. The following wagers may be placed in the game of Three Card Poker:

   a. A player may compete solely against the dealer by placing an *"Ante"* wager in an amount within the posted minimum and maximum wagers and then placing a *"Play"* wager in an equal amount; call bets are not allowed.

   b. A player may compete solely against a posted payout ledger , placing a *"Pair Plus"* wager which may be in any amount within the posted minimum and maximum wagers.

   c. A player may compete against both the dealer and the posted pay out ledger by placing wagers in accordance with the requirements of (a) and (b) above. The *"Pair Plus"* wager may not exceed the *"Ante"* wager, however it may be smaller than the *"Ante"* wager as long as it meets the table minimum.

2. All wagers at Three Card Poker shall be made by placing gaming chips or cheques on the appropriate betting areas of the table layout. A verbal wager accompanied by cash shall not be accepted.

3. The Dealer will count the number of bets placed in the circles. Each bet will be considered a hand played for the upcoming round. The dealer will then multiply the number of hands that will be played by the ante amount designated by the Authority.

4. The Dealer will take out of the rack the appropriate amount of cheques to satisfy the ante amount above. The Dealer will then place these checks into the left most tube of the chip trey. Once the ante amounts equal $25 or more in the left most chip trey, the Dealer will announce "CHANGE ANTE" in a clear and loud voice. The dealer will take the chips from the ante tube and place and run down the cheques in front of the chip trey. The Dealer will then take out one $25 chip from the chip trey and place the chip in front of the chip trey to the right side of the chips that made up the ante amount. The Dealer will drop the $25 chip into the drop box and then place the ante amount of chips back into the chip trey accordingly. The only cheques allowed to be dropped into the drop box will be for accumulated ante.

5. Only players who are seated at a Three Card Poker table may wager at the game. Once a player has placed a wager and received cards, that player shall remain seated until the completion of the round of play.

6. All ante wagers and pair plus wagers shall be placed prior to the dealer announcing "No more bets" in accordance with the dealing procedures described in these procedures. No wager shall be made, increased or withdrawn after the dealer has announced "No more bets". All play wagers shall be placed in accordance with the *"Procedures for Completion each Round of Play"* described below.

PROCEDURES FOR COMPLETION OF EACH ROUND OF PLAY

1. After the dealing procedures have been completed, each player shall examine his or her cards. Each player who wagers at Three Card Poker shall be responsible for his or her own hand and no person other than the dealer and the player to whom the cards were dealt may touch the cards of that player.

2. NOTE: It is acceptable for a player to look at their cards with two hands, as long as the player doesn't cover over half of the cards and the player keeps their cards in the playing area of the table.

3. After examination of his or her cards, each player who has placed an ante wager shall have the option to either make a play wager in an amount equal to the player's ante wager or forfeit the ante wager and end his or her participation in the round of play.

The dealer shall offer this option to each player, starting with the player farthest to the left of the dealer and moving clockwise around the table in order. If a player has placed an ante wager and a pair plus wager but does not make a play wager, the player shall forfeit the ante wager and the pair plus wager. After each player has either placed a wager on the table in the play wager area or forfeited his or her wager and hand, the dealer shall collect all forfeited wagers and associated cards, placing the cards face up on the layout. Once the cards are verified, the dealer will place the cards in the discard rack. The dealer shall then reveal the dealer's cards and place the cards so as to form the highest possible ranking hand. The dealer shall then, starting with the player farthest to the dealer's right whose hand is still active, reveal the three-card hand of each player.

4. NOTE: The dealer shall reveal the player's hand by spreading the cards starting from the player and back to the dealer with at least 2/3 of each card showing. After exposing the hand, the dealer shall arrange the hand in order from highest to lowest starting from the player and back to the dealer. The hand should be revealed just to the dealer's right of the betting circles of the hand being revealed.

5. Each hand will be settled by the dealer starting from his right by taking or paying or pushing each bet. After the bet has been settled, the dealer will pick up the cards for the hand just settled and place the cards in the discard rack.

6. All cards collected by the dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each hand in the event of a question or dispute.

THREE CARD POKER RANKINGS

1. The rank of the cards used in Three Card Poker, in order of highest to the lowest rank, shall be: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3, and 2. All suits shall be considered equal in rank. Notwithstanding the foregoing, an ace may be used to complete a "straight flush" or a "straight" with a two and three.

2. The permissible poker hands in the game of Three Card Poker, in order of highest to lowest rank, shall be:

    a. "Straight flush" is a hand consisting of three cards of the same suit consecutive ranking; with ace, king, and queen being the highest straight flush and three, two, and ace being the lowest ranking straight flush.

    b. "Three-of-a-kind" is a hand consisting of three cards of the same rank, regardless of suit, with three aces being the highest ranking three-of-a-kind and three twos being the lowest ranking three-of-a-kind.

c. "Straight" is a hand consisting of three cards of consecutive rank, regardless of suit, with ace, king, and queen being the highest ranking straight and three, two, and ace being the lowest ranking straight.

d. "Flush" is a hand consisting of three cards of the same suit, regardless of rank.

e. "Pair" is a hand consisting of two cards of the same rank, regardless of suit, with
   i. aces being the highest ranking pair and two two's being the lowest ranking pair.

3. When comparing two hands that are of identical hand rank, the hand that contains the best ranking card, as provided above, shall be considered the higher ranking hand. If the hands are of identical rank, the hands shall be considered a push.

PAYOUT ODDS

1. The payout odds are as follows:

   a. A player in competition against the dealer shall be paid 1 to 1 on both the ante wager and the play wager if the player's hand is ranked higher than the dealer's hand. If the dealer does not hold a hand with a *"queen high or better"* rank, the ante wager shall automatically be paid 1 to 1 and the play wager shall be returned to the player.

   b. A player placing a pair plus wager shall be paid in accordance with the following payout ledger.

PAY-TABLE

	ANTE	***PLAY****	***ANTE BONUS***	***PAIR PLUS***
QUEEN OR BETTER	1 to 1	1 to 1		
PAIR	1 to 1	1 to 1	------	1 to 1
FLUSH**	1 to 1	1 to 1	------	3 to 1
STRAIGHT	1 to 1	1 to 1	1 to 1	6 to 1
THREE OF A KIND	1 to 1	1 to 1	4 to 1	30 to 1
STRAIGHT FLUSH	1 to 1	1 to 1	5 to 1	40 to 1

ALTERNATE PAY-TABLE

	ANTE	*PLAY**	*ANTE BONUS*	*PAIR PLUS*
QUEEN OR BETTER	1 to 1	1 to 1		
PAIR	1 to 1	1 to 1	------	1 to 1
FLUSH**	1 to 1	1 to 1	------	3 to 1
STRAIGHT	1 to 1	1 to 1	1 to 1	6 to 1
THREE OF A KIND	1 to 1	1 to 1	5 to 1	33 to 1
STRAIGHT FLUSH	1 to 1	1 to 1	6 to 1	35 to 1

2. "Play" bet is paid only if dealer qualifies with a Queen or better and the player's hand ranks higher than the dealer's.

3. ** Unlike five card poker, a straight is a higher hand than a flush due to the mathematic combinations.

IRREGULARITIES

1. A card that is found face up in the shoe or the deck while the cards are being dealt shall not be used in the game and shall be placed in the discard rack. If more than one card is found face up in the shoe or the deck during the dealing of the cards, all hands shall be void and the cards shall be reshuffled.

2. A card drawn in error without its face being exposed shall be used as though it was the next card from the shoe or the deck.

3. If any player or the dealer is dealt an incorrect number of cards, all hands shall be void and the cards shall be reshuffled.

4. An exposed card does not constitute a misdeal. The dealer will turn the card over and continue to deal.

5. EXCEPTION: If one or more of the dealer's cards is inadvertently exposed prior to the dealer revealing his or her cards as described above, all hands shall be void and the cards shall be reshuffled.

6. If an automated dealing shoe is being used and the device jams, stops dealing cards, or fails to deal all cards during a round of play, the round of play shall be void and the cards shall be removed from the device and reshuffled with any cards already dealt.

7. Management's decision is final.

TRU PROBLEM LOG AND MACHINE TESTING LOG	Policy No: 1400.29.01	Issue Date: 8/5/2010 Revised Date: 11/19/2009
PURPOSE: To establish policy and procedures for tracking problems with the TRU units and for tracking the testing of the TRU units.		

DCR Compliance – ITEM Tracking	Date
Issue Date	8/5/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	11/19/2009
QTGA Submission	11/25/2009
QTGA Return	12/21/2009
Compliance Review	6/21/2010
QTGA Submission	6/24/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	7/29/2010
GM Approval	7/30/2010
QTGA Final Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

1. The TRU Problem log and machine testing log (also called the TRU Error Log, pg. 3) will be completed each time there is a problem with a TRU unit and/or the Unit is tested with an EZ pay ticket to ensure proper payout. (This log replaces any other log that may now be used.)

PROCEDURE

1. The Cage Supervisor or above or a Main Bank Cashier that goes out to the machine will log all pertinent information in the log. This includes machine problems and/or machine testing. The log will be maintained in the Main bank and used by the Main Bank Cashiers and the Cage Supervisors or above.

2. This procedure is a tool to know what occurred with each machine on a given day and to ensure that the machines are being tested properly. The Log contains the following:

   a. Date

   b. Shift

c. Time

d. Problem (Details as to what is going on with the TRU machine)

e. Steps taken to correct

f. Machine Status

g. Initials and badge number

Example 1: 3/4/09 – Swing – 10:55 pm – Short pay guest – Completed paid out and paid guest – Machine up – DM 1234

Example 2: 3/4/09 – Day – 9:05 am – Machine Test – Machine Test OK – Machine up – DM 1234

Example 3: 3/5/09 – Grave – 12:02 am – Fill $5 cassettes – BV test complete – Test OK both BV's – Machine UP – DM 1234

Example 4: 3/4/09 – Day – 12:02 pm – Tech Came to fix – Replaced parts – Could not fix – Will return on 3/5/09 to repair – Machine down – DM 1234

TRU ERROR LOG - (Includes hand pays and partial pays through the front line.)

Glory 11 Log

TRU #	DATE	Shift	Type of ERROR	Occurrence- How Many Times	Status UP-Down
11	11/1	d	no error	0	up
11	11/1	S	no error	0	up
11	11/1	g	no error	0	up
11	11/2	d	no errors	0	up
11	11/2	S	no errors	0	up
11	11/2	g	no errors	0	up
11	11/3/	d	no errors	0	up
11	11/3	S	no errors	0	up
11	11/3	g	no errors	0	up
11	11/4	d	no errors	0	up
11	11/4	s	bill dispenser error	1	up
11	11/4	g	no errors	0	up
11	11/5	D	no errors	0	up
11	11/5	S	bill dispenser error	1	up
11	11/5	G	no errors	0	up
11	11/6	d	no errors	0	up
11	11/6	S	Coin hopper error and dispenser error	2	up
11	11/6	g	no errors	0	up
11	11/7	d	no errors	0	up
11	11/7	S	no errrors	0	up
11	11/7	g	no errors	0	up
11	11/8	D	no errors	0	up
11	11/8	S	no errors	0	up
11	11/8	g	no errors	0	up
11	11/9	d	no errors	0	up
11	11/9	S	no errors	0	up
11	11/9	g	no errors	0	up
11	11/10	d	no errors	0	up
11	11/10	S	no errors	0	up
11	11/10	g	no errors	0	up
11	11/11	d	1 hand pay	1	up
11	11/11	S	coin hopper error	1	up
11	11/11	g	no errors	0	up
11	11/12	d	no errors	0	up
11	11/12	S	no errors	0	up
11	11/12	G	1 hand pay	1	up
11	11/13	d	no errors	0	up
11	11/13	S	bill dispenser error	3	up
11	11.13.9	g	bill dispenser error	3	down.
11	11.14.09	d	moved to warehouse, belt problems	0	down
11	11/14	S	in warehouse waiting on reapair	0	down
11	11/14	g	in warehouse waiting on reapair	0	down
11	11/15	d	in warehouse waiting on reapair	0	down
11	11/15	S	in warehouse waiting on reapair	0	down
11	11/15	g	in warehouse waiting on reapair	0	down
11	11/16	d	in warehouse waiting on reapair	0	down
11	11/16	S	in warehouse waiting on reapair	0	down
11	11/16	g	in warehouse waiting on reapair	0	down
11	11/17	d	on floor, still down	0	down
11	11/17	s	on floor, up	0	up
11	11/17	G	no errors	0	up
11	11/18	d	no errors	0	up
11	11/18	S	no errors	0	up
11	11/18	G	no errors	0	up
11	11/19	d	no errors	0	up

Processing Valet Tokes Through the Main Bank	**Policy No:** 1400.33.01	**Issue Date:** 8/9/2010
PURPOSE: To establish policy and procedures for processing Valet tokes through the Main Bank.		

DCR Compliance – ITEM Tracking	**Date**
Issue Date	8/9/2010
QTGA Submission	7/8/2009
QTGA Return	11/6/2009
Compliance Review	4/29/2010
QTGA Submission	5/6/2010
QTGA Return	7/28/2010
Compliance Review	7/29/2010
QTGA Submission	8/5/2010
QTGA Final Approval	8/9/2010
GM Approval	8/5/2010
DDA Final Approval	8/12/2010

POLICY

Valet tokes are acceptable, but may not be solicited by Valet Team Members. The following is the proper procedure for accepting, maintaining, and distributing Valet tokes.

PROCEDURES

Accepting Tokes

When a toke is generated, the Valet Team Member will collect and hold the toke in clear site until the toke can be deposited in the clear fixed toke box located at the base station.

Maintaining Tokes

1. All Valet tokes will be maintained in the designated clear toke containers for a period of one (1) Shift. At the end of each shift, the Valet supervisor will collect the entire toke pool, seal in a tamper evident clear bag, and sign denoting "valet" with a shift, date, signature, and badge number.

2. The toke bag will be deposited at the end of each shift to the Main Bank.

3. The funds shall be verified by the Main Bank Cashier with the amount incorporated into the Main Bank funds.

4. The Main Bank Cashier shall enter the funds into the ABACUS system by the following:

   a. Select "Receive" from location.

b. Enter Password.

c. Choose “Valet Tokes”.

d. Enter the total amount received.

e. Select “Save” and a receipt shall print.

f. Sign the receipt with the Cashier’s signature and badge number.

g. Select “Yes” received a good print out.

<u>Distribution Tokes</u>

1. Tokes will be allocated by payroll to all hourly valet attendants based on hours worked.

2. The Transportation Manager or above shall review and approve the valet toke pool.

3. All tokes will be disbursed on the Valet’s normal pay check.

4. Tokes may never be given as cash from DCR to the Valet Team Members, any failure to comply with this policy will be considered an attempt to circumvent reporting and be subject to Valet Team Members discipline up to and including termination.

5. Nothing in the policy prevents the Management of Downstream Casino Resort, the Downstream Development Authority, Quapaw Tribal Gaming Agency, Internal Revenue Service, or any other applicable agency from taking further action against as may be deemed necessary.