



Four Winds Casinos and the Pokagon Band Gaming Commission Responsible Gaming Program





Pokégnek Bodéwadmik POKAGON BAND OF POTAWATOMI GAMING COMMISSION

Dawn Hogan, PBGC



About Myself:

Dawn Hogan – Gaming Inspector, Pokagon Band of Potawatomi Indians Gaming Commission

- 10 months with PBOPI Gaming Commission
- II+ years with Four Winds between Food & Beverage and Security

Responsibilities include:

- The regulatory oversight of all Pokagon gaming operations to ensure compliance with the Gaming Regulatory Act, Indian Gaming Regulatory Act (IGRA), the National Indian Gaming Commission (NIGC) Minimum Internal Control Standards (MICS), Tribal-State Compact(s), the Liquor Control Codes, the Liquor Regulations, and other applicable laws, policies and procedures, or governing documents.
- Oversight of the PBGC Regulations that enhance the responsible gaming program



Responsible Gaming Mission Statement

We recognize that certain individuals may not be able to responsibly enjoy the entertainment product we offer. We believe that it is our responsibility to be sensitive to our Employees, guests, and host communities by proactively addressing problem gambling.

We will:

- Educate our Employees and provide them with resources to help themselves and others.
- Provide information and assistance to our guests.
- Fund research and contribute to agencies that assess the prevalence and address the treatment of gambling disorders.
- Participate in industry programs and initiatives at the national and community level to increase awareness and ensure that accurate information is placed in the public domain.
- Prevent underage gambling of all kinds.



Pokagon Band Gaming Commission Requirements for Responsible Gaming in the Casinos

The Pokagon Gaming Regulatory
Act Requires:

The Gaming Commission's Regulations Require:

A Self Exclusion Program

A Training Program for Employees which must Include Coverage of the Following Subjects:

Recognition of Problem Gambling Behaviors

Intervention Techniques

Assistance/Referral Programs

Printed Material





Four Winds Casinos Responsible Gaming

Five Major Pillars:

Employee Awareness and Training: Detection, Intervention, and Referral

- Red Flag Behaviors (Falling asleep, personal neglect, or extreme anxiety or irritability).
- Guests are referred to the Responsible Gaming Brochures, Helpline(s), or referred to the PBGC.

Funding/contributions and involvement with organizations providing resources to gambling addicts/families.

- Has contributed over \$250,000 to the National Council on Problem Gambling (NCPG) since 2007.
- Is an organizational member of the NCPG and has a voting member on the Awards Committee.
- Was involved in the Tribal Summit's creation and was among the first major sponsors of the annual Tribal Summit on Responsible Gaming, which began in 2017, at the National Conference on Problem Gambling.
- Raquel Buari, VP of Compliance for Four Winds holds a seat on the Board for NCPG as well as the Michigan Association of Problem Gambling (MAPG).

Self Exclusion Program - The PBGC or designated staff administers the self exclusion program.

- Exclusions are for all four (4) properties. Exclusions from FW are also added on Indiana Gaming Commission (IGC) List.
- Brick & Mortar and the Online Casino & Sportsbook are separate exclusions. Exclusions can be done remotely.
- Time Frame Parameters: First Exclusion is Minimum of two (2) years. Second Exclusion is for Lifetime.





Four Winds Casinos Responsible Gaming

Five Major Pillars Continued:

Minor Policy (prevention) - FW has a strong commitment to the prevention of underage gambling.

- Security officers are posted at the Casino entrances at all four (4) properties to closely monitor for minors.
- Not allowed in Dowagiac and Hartford, MI, because the non-gaming amenities suitable for minors is very minimal.
- NB and SB properties are the only properties that allow minors to dine at the venues and shop at the retail stores, but they must always be escorted by an adult at all times. Not allowed to loiter in the gaming areas, even when escorted.

Responsible Liquor Service

- Closely monitors the guest's alcohol consumption and provides alcohol sensitivity training to appropriate EE's and managers.
- Visibly intoxicated guests are cut off from alcohol service and removed from the Gaming Floor to prevent them from making gambling decisions while being under the influence.



Printed Materials/Websites

- Printed Brochures are available throughout Four Winds gaming floors and from staff members at request. In addition to providing valuable information, the brochures contain the numbers to the NCPG hotline as well as the Indiana and Michigan state hotlines.
- Many of our printed materials, from our table game rule rack cards, to our players club (rewards club) cards, contain the NCPG hotline number and remind the player that the Pokagon Band invites them to play responsibly.
- https://www.fourwindscasino.com/responsible-gaming/
- https://play.fourwindscasino.com/responsible-gaming

Pokagon Band Gaming Commission Requirements for Internet and Sportsbook Responsible Gaming

The website or Internet gaming platform must display a responsible gaming logo to direct a patron to the Gaming Operation's website or Internet gaming platform responsible gaming page.

A responsible gaming patron protection page that is accessible to a patron during a session and contains:

- Prominent messaging throughout the site.
- A direct link to the Michigan Gaming Control Board Compulsive/Problem Gambling website and one other organization based in the United States dedicated to helping people with potential gambling problems.
- A clear statement of the Gaming Operation's or Internet gaming policy and commitment to responsible gaming.
- Employee Awareness and Training Detection, Intervention, and Referral
- Self Exclusion Program.
- Procedure to identify and prevent the following:
 - Patrons under the age of twenty-one (21)
 - Patrons on the state of MI Responsible Gaming Database, IN Gambling Exclusion List, FW internet Self-exclusion list
 - Patrons who have had their account closed, suspended, or have exceeded their spend or time-based limit.
- Allow a patron to establish gaming limits. Any decrease to these limits shall be effective no later than the patron's next log in.
 - A deposit limit, and spend limit shall be offered on a daily, weekly, and monthly basis.
 - A time-based limit shall be offered on a daily basis.







Four Winds Casinos Internet and Sportsbook Responsible Gaming

A responsible gaming patron protection page that is accessible to a patron during a session and contains:

- Prominent messaging throughout the site.
- A direct link to the Michigan Gaming Control Board Compulsive/Problem Gambling website and one other organization based in the United States dedicated to helping people with potential gambling problems.
- A clear statement of the Gaming Operation's or Internet gaming policy and commitment to responsible gaming.
- Employee Awareness and Training Detection, Intervention, and Referral
- **Self Exclusion Program** The PBGC or designated staff administers the self exclusion program.
 - Exclusions are for all four (4) properties. Exclusions from FW are also added on Indiana Gaming Commission (IGC) List.
 - Brick & Mortar and the Online Casino & Sportsbook are separate exclusions. Exclusions can be done remotely.
 - Time Frame Parameters: First Exclusion is Minimum of two (2) years. Second Exclusion is for Lifetime.
- Procedure to identify and prevent the following:
 - Patrons under the age of twenty-one (21)
 - Patrons on the state of MI Responsible Gaming Database, IN Gambling Exclusion List, FW internet Self-exclusion list
 - Patrons who have had their account closed, suspended, or have exceeded their spend or time-based limit.
- Patrons establish gaming limits. Any decrease to these limits shall be effective no later than the patron's next log in.
 - A deposit limit, and spend limit shall be offered on a daily, weekly, and monthly basis.
 - A time-based limit shall be offered on a daily basis.



Responsible Gaming Workgroup





In an effort to remain diligent in continually reviewing our program for improvements, Four Winds sets the tone of our commitment from the top. Key executive positions meet periodically to discuss our program and ideas to improve. Those executives include the highest positions in Compliance, Legal, Human Resources, Gaming Operations, Marketing, Security.

Ideas from this working group are then shared with the COO, CFO, Gaming Commission, and finally – the ownership.



Questions?

My contact info:

Dawn Hogan, Gaming Inspector, Pokagon Band of Potawatomi Indians Gaming Commission dawn.hogan@pokagonband-nsn.gov

Raquel Buari, VP of Compliance, Four Winds Casinos rbuari@fourwindscasino.com
Office (269) 926-5020

Four Winds Casinos and PBGC Responsible Gaming Committee ResponsibleGaming@fourwindscasino.com

Hard copies of the regulatory documents can be found on the following website, under "Government/Codes & Ordinances/PBGC Regulations":

www.pokagonband-nsn.gov