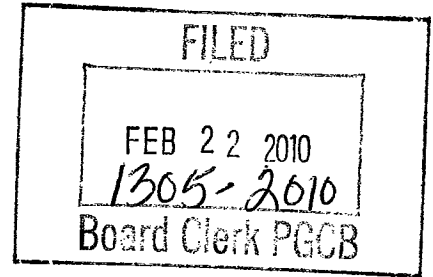


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**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA GAMING CONTROL BOARD**

**IN RE: PETITION OF SANDS : DOCKET NO. F-1353
BETHWORKS GAMING LLC :**

**PETITION OF SANDS BETHWORKS GAMING LLC FOR AUTHORIZATION TO
CONDUCT TABLE GAMES PURSUANT TO 4 Pa. C.S. §1312A(a)**

NOW COMES, Sands Bethworks Gaming LLC, (hereinafter "SANDS"), a Category 2 Slot Operator licensee, with a principal place of business at 77 Sands Boulevard, Bethlehem, Pennsylvania, by and through its attorneys, Holly L. Eicher, Esquire and Frederick H. Kraus, Esquire, by petition of the Pennsylvania Gaming Control Board (hereinafter "Board"), states:

1. SANDS is the holder of a Category 2 Slot Machine Operator License issued pursuant to 4 Pa. C.S.A. §1302, License No. F-1353.
2. SANDS was granted permission by the Board pursuant to 58 Pa. Code §467a.1(b) to commence slot operations with 3,000 slot machines effective May 22, 2009.

3. SANDS was granted permission by the Board pursuant to 4 Pa.C.S. §1210(b) to operate 3,250 slot machines effective November 22, 2009.

4. Pursuant to 4 Pa. C.S. §1312A(a), SANDS requests authorization from the Board to conduct table games.

5. Pursuant to the requirements of a petition seeking authorization to conduct table games found in 4 Pa. C.S. §1312A(b), SANDS provides the following:

- a. The name, business address and contact information of the Petitioner pursuant to 4 Pa. C.S. §1312A(b)(1) attached hereto as **Appendix 1**.
- b. The name and business address, job title and a photograph of each principal and key employee of the petitioner who will be involved in the conduct of table games and who is not currently licensed by the board, if known pursuant to 4 Pa. C.S. §1312A(b)(2) attached hereto as **Appendix 2**.
- c. An itemized list of the number of gaming tables and types of table games for which authorization is being sought pursuant to 4 Pa. C.S. §1312A(b)(3) attached hereto as **Appendix 3**.
- d. The estimated number of full-time and part-time employment positions that will be created at the licensed facility if table games are authorized and an updated hiring plan pursuant to section 1510(a) (relating to labor hiring preferences) which outlines the petitioner's plan to promote the representation of diverse groups and Commonwealth residents in the employment positions pursuant to 4 Pa. C.S. §1312A(b)(4) attached hereto as **Appendix 4**.

- e. A brief description of the economic benefits expected to be realized by the Commonwealth, its municipalities and its residents if table games are authorized at the petitioner's licensed facility pursuant to 4 Pa. C.S. §1312A(b)(5) attached hereto as **Appendix 5**.
- f. The details of any financing obtained or that will be obtained to fund an expansion or modification of the licensed facility to accommodate table games and to otherwise fund the cost of commencing table game operations pursuant to 4 Pa. C.S. §1312A(b)(6) attached hereto as **Appendix 6**.
- g. Information and documentation concerning financial background and resources, as the board may require, to establish by clear and convincing evidence the financial stability, integrity and responsibility of the petitioner pursuant to 4 Pa. C.S. §1312A(b)(7) attached hereto as **Appendix 7**.
- h. Information and documentation, as the board may require, to establish by clear and convincing evidence that the petitioner has sufficient business ability and experience to create and maintain a successful table game operation. In making this determination, the board may consider the results of the petitioner's slot machine operation, including financial information, employment data and capital investment pursuant to 4 Pa. C.S. §1312A(b)(8) attached hereto as **Appendix 8**.
- i. Information and documentation, as the board may require, to establish by clear and convincing evidence that the petitioner has or will have

the financial ability to pay the authorization fee under section 1361A (relating to table game authorization fee) pursuant to 4 Pa. C.S. §1312A(b)(9) attached hereto as **Appendix 9**.

j. Detailed site plans identifying the petitioner's proposed table game area within the licensed facility pursuant to 4 Pa. C.S. §1312A(b)(10) attached hereto as **Appendix 10**.

k. If the petitioner is a Category 1 or Category 2 slot machine licensee, a waiver, on a form prescribed by the board which is signed by the petitioner and acknowledged by each of the petitioner's principals, of the following rights arising as a result of an amendment or addition to this part that took effect at the same time as the effective date of this section:

i. the petitioner's right under section 1209(f) (relating to slot machine license fee) or under any contract executed by the applicant and the department under section 1209(c) to receive the return of any portion of the slot machine license fee paid by the petitioner for its slot machine license; and

ii. the petitioner's right, if any, to sue for the return of any portion of the slot machine license fee paid by the petitioner for its slot machine license pursuant to 4 Pa. C.S. §1312A(b)(11) and 4 Pa. C.S. §1315A(8) attached hereto as **Appendix 11**.

l. Other information as the board may require pursuant to 4 Pa. C.S. §1312A(b)(12):

- i. A description of the licensee's plan to provide training and instruction, or equivalent, for personnel that will be involved in table games pursuant to 4 Pa. C.S. §1302A(7) and 4 Pa. C.S. §1323A(a) attached hereto as **Appendix 12**.
- ii. Total anticipated investment by the licensee associated with table games (construction, renovations, etc.) and an estimate of the number of construction jobs involved pursuant to 4 Pa. C.S. §1312A(b)(12) attached hereto as **Appendix 13**.

6. **WHEREFORE**, SANDS respectfully requests the Board authorize Sands to conduct table games.

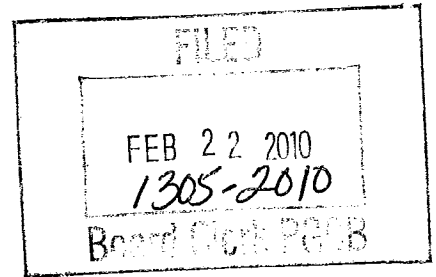
Respectfully submitted,

DATED: February 17, 2010

By: 

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Pennsylvania Bar No. 74724
FEDERICK H. KRAUS, ESQUIRE
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COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA GAMING CONTROL BOARD

IN RE: PETITION OF SANDS : DOCKET NO. F-1353
BETHWORKS GAMING LLC :

MOTION TO PROTECT CONFIDENTIAL INFORMATION

NOW COMES, Sands Bethworks Gaming LLC, (hereinafter "Sands") a Category 2 Slot Machine Licensee, License, Number F-1353, with a current place of business located at 77 Sands Boulevard, Bethlehem, Pennsylvania, 18015, by and through its attorneys Holly L. Eicher, Esquire and Frederick H. Kraus, Esq., and requests that the Pennsylvania Gaming Control Board ("PGCB") grant the instant Motion to Protect Confidential Information ("Motion").

1. Sands has filed a Petition pursuant to 4 Pa. C. S. §1312A(a) for Authorization to Conduct Table Games ("Petition") simultaneously with this Motion.
2. Attached to the Petition as **Appendix 6** and filed under seal are the details of any financing obtained or that will be obtained to fund an expansion or

modification of the licensed facility to accommodate table games and to otherwise fund the cost of commencing table game operations pursuant to 4 Pa. C.S. §1312A(b)(6).

3. Attached to the Petition as **Appendix 7** and filed under seal is Information and documentation concerning financial background and resources, as the board may require, to establish by clear and convincing evidence the financial stability, integrity and responsibility of the petitioner pursuant to 4 Pa. C.S. §1312A(b)(7).
4. Attached to the Petition as a part of **Appendix 8** and filed under seal is certain financial information and the licensee's overall budget for 2010 and the revenue projections from table game operations pursuant to 4 Pa. C.S. §1312A(b)(8).
5. Attached to the Petition as **Appendix 9** and filed under seal is Information and documentation, as the board may require, to establish by clear and convincing evidence that the petitioner has or will have the financial ability to pay the authorization fee under section 1361A (relating to table game authorization fee) pursuant to 4 Pa. C.S. §1312A(b)(9).
6. Attached to the Petition as **Appendix 10** and filed under seal are detailed site plans identifying the petitioner's proposed table game area within the licensed facility and, among other things, the locations of slot machines, all restricted

areas, the surveillance camera layout, the count room, and the armored car bay area pursuant to 4 Pa. C.S. §1312A(b)(10).

7. Sands requests that the information contained in **Appendices 6, 7, 8, 9, and 10** of the Petition as listed above be deemed to be confidential information that is protected pursuant to 4 Pa. C.S. § 1206(f), 4 Pa. C.S. § 1207(2) and 58 Pa. Code § 407a.3.

8. 4 Pa. C.S. § 1206(f) provides in pertinent part that:

“All information submitted by an applicant pursuant to section 1310(a) (relating to slot machine license application character requirements) or obtained by the board or the bureau as part of a background investigation from any source shall be considered confidential. Except as provided in section 1517(f) (relating to investigation and enforcement), the information shall be withheld from public disclosure in whole or in part, except that any information shall be released upon the lawful order of a court of competent jurisdiction or, with the approval of the Attorney General, to a duly authorized law enforcement agency or shall be released to the public, in whole or in part, to the extent that such release is requested by an applicant and does not otherwise contain confidential information about another person. The board may not require any applicant to waive any confidentiality provided for in this subsection as a condition for the approval of a license or any other action of the board.”

1. 4 Pa. C.S. § 1207(2) provides that the Board’s regulatory authority permits them to “Restrict access to confidential information in the possession of the

board which has been obtained under this part and ensure that the confidentiality of information is maintained and protected.”

2. 58 Pa. Code § 407a.3(a)(2) provides that “Documents and information relating to proprietary information, trade secrets, patents or exclusive licenses, architectural and engineering plans and information relating to competitive marketing materials and strategies which may include customer-identifying information or customer prospects for services subject to competition” are deemed to be confidential information.

WHEREFORE, Petitioner respectfully requests that the Board enter an Order granting Sands instant Motion to Protect Confidential Information.

Respectfully submitted,

DATED: February 17, 2010

By: 
HOLLY L. EICHER, ESQUIRE
Pennsylvania Bar No. 74724
FEDERICK H. KRAUS, ESQUIRE
Pennsylvania Bar No. 32190
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FAX: 610-625-2137
Attorneys for Petitioner
Sands Bethworks Gaming LLC

CERTIFICATE OF SERVICE

I, HOLLY L. EICHER, ESQUIRE, Vice-President and General Counsel for Sands Bethworks Gaming, LLC, hereby certify true and correct copies of Sands Bethworks Gaming, LLC's Petition for Authorization to Conduct Table Games Pursuant to 4 Pa. C.S. §1312A(a), Appendix Checklist, and Sands Bethworks Gaming LLC's Motion to Protect Confidential Information have been served upon the individuals named below as follows:

Personal Hand Delivery:

Ms. Linda S. Lloyd
Director of Hearings and Appeals
Pennsylvania Gaming Control Board
2601 North Third Street, Fifth Floor
One Penn Center, Suite 502
Harrisburg, PA 17110
(Original plus one (1) original Redacted copy)

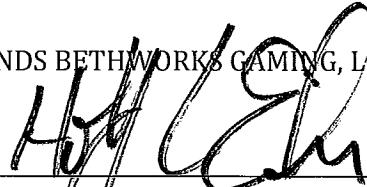
Mr. Kevin F. O'Toole
Executive Director
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
Verizon Tower, Fifth Floor
Harrisburg, PA 17102-1825
(Five (5) copies)

Via E-mail:

Nan Davenport, Esquire
Deputy Chief Enforcement Counsel
Pennsylvania Gaming Control Board
Verizon Tower – Fifth Floor
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Thomas Diehl, Esquire
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SANDS BETHWORKS GAMING, LLC



HOLLY L. EICHER, ESQUIRE
Vice-President and General Counsel
77 Sands Boulevard
Bethlehem, PA 18015
Phone: 484-777-7712
Facsimile: 610-625-2137

DATED: February 17, 2010

Appendix 1

**The Name, Business address, and contact information of the petitioner.
(§1312A(b)(1)).**

**Petitioner: Sands Bethworks Gaming LLC
d/b/a Sands Casino Resort Bethlehem
Category 2 Slot Operator License Number F-1353**

**Business Address: 77 Sands Boulevard
Bethlehem, Pennsylvania 18015**

**Contact Information: Robert J. DeSalvio
President
Sands Bethworks Gaming LLC
77 Sands Boulevard
Bethlehem, Pennsylvania 18015
Phone: 484-777-7710**

**Holly L. Eicher, Esq.
Vice President – General Counsel
Sands Bethworks Gaming LLC
77 Sands Boulevard
Bethlehem, Pennsylvania 18015
Phone: (484) 777-7712**

**Frederick H. Kraus, Esq.
Vice President – General Counsel
Venetian Casino Resort
3355 Las Vegas Boulevard South
Las Vegas, NV 89109
Phone: (702) 414-4409**

Appendix 2

Name and business address, job title and a photograph of each principal and key employee who will be involved in the conduct of table games and is not currently licensed by the Board. (§1312A(b)(2)).

Name: John J. Kennedy
Key license applicant

Job Title: Director of Table Games

Business Address: Sands Bethworks Gaming LLC
77 Sands Boulevard Bethlehem, PA 18015.

See photo below: (REDACTED)



Appendix 3

Itemized List of the number and types of table games for which authorization is sought. (§1312A(b)(3)).

Game Type	# Games	Sit Down	total
Poker	12		12
Blackjack	39	2	41
Craps	4		4
Roulette	4		4
Mini Baccarat	5		5
Midi Baccarat	0	4	4
Pai Gow Poker	2	2	4
Big Six	1		1
Let It Ride	2		2
Caribbean Stud	2		2
Three Card Poker	4		4
Texas Hold'em Bonus Poker	4		4
Casino War	1		1
Sic Bo	1		1
	81	8	89

Appendix 4

The estimated number of full-time and part-time employment positions that will be created at the licensed facility and an updated hiring plan pursuant to section 1510 (relating to labor hiring preferences) which outlines the petitioner's plan to promote the representation of diverse groups and Commonwealth residents in the new employment positions. (§1312A(b)(4)).

1. The estimated number of full-time and part-time positions to staff table games operations at the Sands is approximately 393 Full Time Equivalent (FTE) positions.
2. See the attached Sands Casino Resort Hiring Plan 2010

**Sands Casino Resort Bethlehem
Estimated Table Games Positions**

Position Title	FTE
<u>Table Games</u>	
DEALER	275.4
SUPERVISOR, CASINO GAMES	19.5
SUPERVISOR, CASINO GAMES (training)	20.0
ASST. SHIFT MANAGER-TABLE GAMES	4.2
SHIFT MANAGER-TABLE GAMES	4.2
	323.3
<u>Casino Credit</u>	
CLERK-CASINO CREDIT	2.0
MANAGER, CASINO CREDIT	1.0
COLLECTIONS MANAGER	1.0
CASINO CREDIT EXECUTIVE	1.0
	5.0
<u>Casino Administration</u>	
MANAGER CASINO ADMINISTRATION	1.0
ADMINISTRATOR, OPERATIONS	1.0
CLERK, OPERATIONS	1.0
DIRECTOR TG OPERATIONS	1.0
POKER ROOM MANAGER	1.0
	5.0
<u>Casino Accounting Operations</u>	
SUPV-CAS CAGE	2.0
CAGE CASHIER	3.0
MARKER BANK CASHIER	4.2
FILL BANK CASHIER	4.2
COUNTROOM/DROP TEAM	5.6
	19.0
<u>Casino BOH Administration</u>	
TABLE REVENUE AUDITOR	3.0
CASINO COMPLIANCE SPECIALIST	1.0
PAYROLL SUPERVISOR	1.0
	5.0
<u>Marketing Services</u>	
DIRECTOR PLAYER DEVELOPMENT	1.0
PLAYER DEVELOPMENT HOSTS	6.0
	7.0
<u>EVS-Public Areas</u>	
CLEANING SPECIALISTS	11.0
	11.0
<u>Security</u>	
SECURITY OFFICER/EMT	9.7
	9.7
<u>Surveillance</u>	
SURVEILLANCE OPERATOR	8.4
	8.4
TOTAL	393.4



Hiring Plan
January 2010

I. INTRODUCTION

The Sands Bethworks Gaming LLC d/b/a Sands Casino Resort Bethlehem (Sands) Diversity Plan has its genesis in the Diversity Plan of its parent corporation, the Las Vegas Sands Corp. ("LVSC") where there is a culture that embraces the diversity of all employees (Team Members). Sands endeavors to create a culture of inclusion and commitment to equal opportunity for people of all races, color, religion, gender, age, sexual orientation, national origin, physical or mental handicap or disability and in which all aspects of diversity are acknowledged and respected.

II. MISSION STATEMENT

Sands Casino Resort Bethlehem's Mission Statement is the same as that of its parent company, LVSC, and its sister property, The Venetian and Palazzo Hotel Resort Casino. The overall mission is to create an experience for our guests which will exceed all others. Our philosophy for creating a unique guest experience is a simple one: Treating all Team Members well, so Team Members will treat guests well. As part of this business philosophy to treat all Team Members well, we are a proactive leader in creating equal opportunities. We recruit, employ, train, and develop individuals without regard to age, race, gender, ethnicity, sexual orientation, religion, socioeconomic background, and native language. The diversity of our Team members is not only respected, it is a valued part of the fabric of the organization.

III. GOALS

To achieve the ultimate goal of a diverse workplace, the Sands Casino Resort Bethlehem's Diversity Plan sets forth five (5) overall goals. These goals also set forth action steps taken by the Sands to achieve those goals. The overriding goals are as follows:

1. Diversity Education Demonstrate its commitment to a diverse and inclusive business culture.
 - All Team Members, including all management, participate in diversity awareness training.
 - Marketing materials show visible support of the Sands' commitment to a culture of diversity.
 - Actively seek MBE/WBE vendors to provide goods and services.
2. Good faith plan to recruit, train, and upgrade diversity. Show evidence of establishing initiatives for recruiting, hiring, training, and promoting (upgrading), minority applicants/Team Members to achieve diversity at all job levels within the Sands.
 - Commitment to recruiting for and re-training a workforce which represents the entire spectrum of race, color, religion, gender, sexual orientation, age, national origin and physical or mental handicap or disability.

- Advertise for recruitment to diverse communities through media that reaches women and minorities.
 - Recruit in local and regional print media and radio. These advertisements reflect diverse faces and voices.
 - Recruit to a wide applicant pool including minority outreach by utilizing community career centers, local libraries and other minority concentric organizations as satellite recruitment centers.
 - Diversity concepts are integrated into hiring practices, orientation and training programs.
 - Provide Team Member friendly development programs and skills training to promote career growth opportunities designed to retain talent.
 - Partner with organizations that represent minorities and the disabled to provide employment opportunities.
 - Partner with educational institutions to provide additional resources to existing and potential Team Members.
3. Good faith plan for enhancing representation of diverse groups and equality of opportunity in employment: Enhance the representation and employment opportunities of diverse groups in the operation of its facility.
4. Establish accountability and monitoring systems to measure and report on the progress of Sands' diversity activities: Make the results of its actions available to the PGCB and the public.
- Track diversity in recruitment and hiring as well as minority and women vendor contracts.
 - Report on a quarterly basis to the Pennsylvania Gaming Control Board our diversity efforts.
5. Be active participants in the community – through volunteerism, charitable giving, and other community outreach efforts.
- Dedication to assisting the community in which our Team Members live and we proactively reach out to those in need on order to encourage improved quality of life for everyone.
 - Regular communication with community leaders and City officials about issues of importance including achieving the goals of diversity.

IV. EMPLOYMENT EFFORTS

Sands Casino Resort Bethlehem is an Equal Opportunity Employer. It is the policy and practice of the Sands that all Team Members be treated equally without regard to race, color, religion, sex, age, sexual orientation, national origin, physical or mental handicap or disability where they can perform all of the essential job functions with or without reasonable accommodation. This policy applies to all privileges including recruitment, hiring, promotion, transfer, and renewal of employment, selection for training or apprenticeship, termination, discipline, length of service and/or terms and conditions of employment.

In addition to providing equal opportunities for all Team Members, it is the Sands' policy to provide a positive and inclusive work environment which values individual differences and enables every team member to contribute and develop to the level of his or her potential.

To that end, it is the goal of the Sands that:

- Team Members are respectful in work and actions toward other Team Members;
- Company policies, procedures and systems will support and encourage diversity;
- An environment is created in which each Team Member can enhance his or her individual skills, abilities and levels of expertise;
- Each Team Member will recognize, respect and positively respond to the diversity of guests and suppliers of the Sands as well as that of their fellow Team Members.

It is the belief of the Sands that valuing and celebrating diversity will result in respected and creative Team Members and a high level of guest and Team Member satisfaction.

Recruitment

1. Advertising

In an effort to attract the most qualified applicants to fill the positions available at the Sands, Sands utilizes an established "Recruitment Media Plan". This includes the use of billboards, newspapers, radio and internet advertising. All print media and radio include diverse persons and voices. Consideration is given to media that would attract ethnically diverse applicants. Below are examples of advertisement placement:

- Radio Advertising in both English and Spanish to reach out to ethnic communities
- Advertisement for employment in specific print media to reach out to different ethnic communities
- Use of 31x30 poster sheets advertising our employment website. The posters are in both English and Spanish.

2. Website

The Sands website provides applicants with access to the online application process. This website provides information as to the types of jobs to be filled, along with directions to and hours of operation for the Employment Center. The Employment Center is located just inside the Team Member Entrance at the Casino.

3. Satellite Recruitment Centers

The Sands has partnered with several diverse organizations in Bethlehem, Allentown and Easton to serve as satellite recruitment centers. The Sands will provide training at the centers related to the online application process to these organizations. These organizations assist their clients with the online application process and serve as an intermediary with questions or concerns regarding the application process. Organizations used in this manner are:

- Southside Branch of Bethlehem Public Library
- Hispanic American Organization
- St. Luke's Neighborhood Center
- ProJeCT of Easton

4. Partnerships with Non-Profits for the Disabled

The Sands has partnered with both Good Shepard Hospital and VIA of Lehigh Valley to create opportunities for their clients who are physically or mentally challenged to work at the Sands.

The Hiring Process

1. Employment Center

The Sands Employment Center is located on the ground level of the casino building adjacent to the Team Member entrance. There are approximately 20 computer workstations available for applicants to complete the online employment application.

In addition to the computers available at the Sands Employment Center, the following locations also act as satellite locations for applicants to complete an online application:

- Fowler Community Technology Center: 1137 E. 5th Street, Bethlehem
- Southside Branch of Bethlehem Public Library: 400 Webster Street, Bethlehem
- Hispanic American Organization: 462 Walnut Street, Allentown
- St. Luke's Neighborhood Center: 435 N. 7th Street Allentown
- ProJeCT of Easton: 200 Ferry Street, Easton

2. Application Process

The application process is completely automated for applicants using an applicant tracking software called HR Logix. Applicants are directed to the application via the website at www.pasands.jobs. Once the applicant begins the application, they are instructed to select an open position. Once selected, the applicant can complete the application. At the end of the application, the system

will prompt the applicant to schedule a pre-screening interview. The applicant is sent a notification via e-mail confirming an interview date and time after a pre-screening interview is scheduled.

3. The interview process

All applicants are required to schedule a pre-screening interview. During this interview, Human Resources Recruiters evaluate applicants with regards to relevant experience in relation to the particular position for which they are applying, as well as friendliness and understanding of customer service. The applicants are assigned a level of excellent, above average, average, below average and poor based on their performance during the interview process. All applicants who achieve a level of excellent and above average are recommended for an interview with a hiring manager. Those who achieve a level of average are placed on a hold list for future consideration, based on the applicant pool. Those who achieve a level of below average or poor are not considered for the position.

Once an applicant is sent to a hiring manager for a second interview, their status is changed to a candidate in HR Logix to indicate that they have passed the initial pre-screening interview with the Recruiter. The hiring managers select the candidates to whom they will make an offer of employment.

4. Notifications to applicants not selected

Any applicant who does not make it through the pre-screening process (those who receive a below average or poor), and those who are interviewed by a hiring manager but are not selected, will be notified via e-mail that another applicant has been selected for the position.

5. Background/Drug test

The Sands requires that each candidate successfully complete a background check and a pre-employment drug test. No candidate is hired until both have been successfully completed.

6. Licensing

The Sands works very closely with the Pennsylvania Gaming Control Board division of Licensing to identify which positions require a license, and the level of license required. Once determined, the Sands Licensing Coordinator works with all candidates to complete applications for said licenses. Slots Link, Pennsylvania's licensing application website, is accessible on all of the computers in the Employment Center. The candidate completes the Slots Link application during the new hire process.

Training

The Sands is committed to training programs that promote career growth opportunities designed to retain talent. Our training efforts include Team Member orientation programs that familiarize the new Team Members with the facility, policies and procedures, benefits program, and the Team Member handbook. Disciplinary procedures and absenteeism policies are also reviewed with an emphasis on fairness and equality. Upgrading, or promotion from within the ranks of our Team Members, is another goal of the Sands. We believe that our strongest asset is a Team Member who is enthusiastic about his or her work and who is willing to pursue and is excited about promotional opportunities. We are in compliance with Federal and Pennsylvania State laws requiring the posting of Labor law posters in our facility, including, but not limited to the issues of Minimum Wage, OSHA, EEOC, Anti-Discrimination and Workers Compensation laws.

Examples of the training initiatives offered to Team Members include:

- New Hire Orientation
- Benefits enrollment
- Supervisory Training
- Transition from Line Level to Supervisor
- How to administer the Corrective Counseling Process
- Hazardous Material Training
- OSHA required courses

In addition to the excellent courses offered to our Team Members onsite, the Sands works with Northampton Community College and the following Pennsylvania and Lehigh Valley community organizations to provide educational and/or training programs:

- Council on Compulsive and Problem Gambling of Pennsylvania
 - Compulsive and Problem Gambling Training
- Northampton Community College
 - Customer Service Training
 - New Supervisor Training
 - Workplace Safety Training
 - English as a Second Language
- Pennsylvania Liquor Control Board
 - RAMP/TIPS Certification

Additionally, the Sands has partnered with Northampton Community College to enhance its Hospitality program and to include courses such as Casino management.

V. TABLE GAMES

The Sands will be seeking to hire over 300 Team Members for the table games department. The majority of those positions will be dealers. The hiring process for dealers is slightly different from the general hiring process. For the hiring of table games staff, the Sands will continue its initiatives for recruiting, hiring, training, and promoting (upgrading), minority applicants/Team Members to achieve diversity at all job levels within the department and the Sands.

1. Training

The Sands will partner with Northampton Community College (NCC) as a certified dealer training center. NCC has purchased the Atlantic Cape Community College dealer training program which is one of the premier training programs in the country. Using this curriculum, all dealers will be required to learn and become proficient in two (2) games, one of which must be blackjack. The Dealer Training Center is expected to open in mid-March 2010, and will be located in the NCC Southside campus (Fowler building) located in the Southside of Bethlehem, just yards from the Sands Casino.

The Sands will be hiring approximately 20 of its table games supervisory staff in early March to support the training efforts of NCC. This staff will be Sands Team Members, but will report to NCC to train new dealers until such time as they transition over to the casino.

2. Hiring Process

The hiring process for all table games management; including supervisors, shift managers and assistant shift managers, will mirror the general hiring processes listed above.

The hiring process for dealers is as follows:

- All potential dealers must prove proficiency in a minimum of two table games through either the successful completion of an approved training program, or previous dealing experience and the ability to pass a dealer audition.
 - Auditions will begin approximately 12 weeks prior to the opening of table games at the casino.
- Once a potential applicant is identified as passing the audition, he or she will be asked to complete an online application for a dealer position.
- During the application process the applicant will schedule a prescreening interview
- If the applicant successfully completes the pre-screening interview he or she will be scheduled to interview with a management representative of the table games department who will be responsible for selecting the final candidates.

- Once selected, the candidate will begin the PGCB gaming license application process
- We expect to have all dealers onboard two weeks prior to table games implementation for in-house training.

VI. HIRING COMMONWEALTH RESIDENTS

The Pennsylvania Statutes, specifically 4 Pa. C.S. §1510, requires the Sands to maintain a local preference in its hiring practices. The Sands endeavors to create a culture of inclusion and commitment to hire residents of Pennsylvania and the Lehigh Valley.

VII. CONCLUSION

The Sands Casino Resort Bethlehem is committed to achieving diversity in the workplace, to creating a strong community presence, and to being one of the best places to work in the Lehigh Valley. The systems, policies, training efforts, and commitment to the community that the Sands has put into motion will all work together in helping us to continue to achieve our diversity and residency goals.

Appendix 5

A brief description of the economic benefits expected to be realized by the Commonwealth, its political subdivisions, and its residents. (§1312A(b)(5)).

Approving a Table Games Certificate for the Sands Casino Resort Bethlehem will create hundreds of new jobs, lead to millions of dollars in new investment in Bethlehem and allow Pennsylvania's growing gaming industry to remain competitive in the regional market place.

On May 22, 2009, the Sands Casino Resort Bethlehem opened for business, and on November 22, 2009 the Casino opened an expanded gaming floor, two new restaurants and an additional lounge. The opening and recent expansion was the product of a four year process and a \$743 million investment by Las Vegas Sands Corp.

In a time of economic downturn and in a region where recent published reports show the unemployment rate in the Lehigh Valley to be at over 9%, approving a Table Games Certificate at the Sands Casino Resort Bethlehem would come at a time when job creation is vital to the local communities. Representatives of the Innovation Group, who testified before the State Legislature regarding a report they authored about the economic impact of table games in Pennsylvania, predicted that approving table games would create thousands of good paying jobs throughout the Commonwealth.

Specifically, at the Sands Casino Resort Bethlehem, the original build out of the facility created approximately 1,000 construction jobs, with more than 75% of the contractors being Pennsylvania-based companies. In the last year, we have also hired hundreds of team members with more than 90% of them being Pennsylvania residents. With the addition of Table Games we anticipate hiring several hundred additional team members and creating additional construction jobs.

Basic economic theory would predict the indirect creation of additional jobs in the Lehigh Valley which would also result in, among other things, additional tax revenue to the Commonwealth and its political subdivisions and a rise in consumer spending for local goods and services. Furthermore, Northampton County, Lehigh County and the City of Bethlehem recently announced a revenue sharing agreement from anticipated table games tax proceeds which will benefit all residents of the Lehigh Valley. The State portion of anticipated table games tax revenue will initially go into the State General Fund and eventually be dedicated to property tax relief.

The gaming market place in this region and across the country is constantly changing. Pennsylvania must remain competitive in this environment or we risk losing the tax revenue to support property tax relief and economic activity. More jobs at the Sands, additional investment in our facility and improved competitiveness in the market place makes approving a Table Games Certificate at the Sands an important economic driver for Bethlehem, the Lehigh Valley and the Commonwealth.

Appendix 6

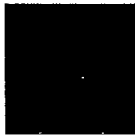
The details of any financing obtained or that will be obtained to fund an expansion or modification of the licensed facility to accommodate table games. (§1312A(b)(6)).

1. Sources and Uses Statement covering the addition of table games.
(REDACTED)



NOTE: The existing building structure provides sufficient square footage for table games and was designed with the prospect of table games in mind with the cost of that design incurred upfront.

2. See the attached executed commitment letter from the Chief Financial Officer for our parent company, Las Vegas Sands Corp. (REDACTED)

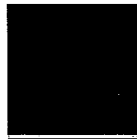
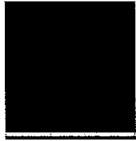
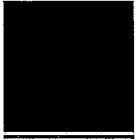


Appendix 7

Information and documentation concerning financial background and resources to establish by clear and convincing evidence the financial stability, integrity and responsibility of the petitioner. (§1312A(b)(7)).

3. See the attached Quarterly Financial Statement for the period ending September 30, 2009 including financial, income and cash flow statements. **(REDACTED)**

4. See the attached letter from the Vice President of Finance for Sands Bethworks Gaming LLC regarding the 2009 Audited Financial Statements. **(REDACTED)**



Appendix 8

Information and documentation to establish by clear and convincing evidence that the petitioner has sufficient business ability and experience to create and maintain a successful table game operation. (§1312A(b)(8)).

Las Vegas Sands Corp is the leading international developer of multi-use integrated resorts. Our Las Vegas, Nevada based company owns and operates the Venetian Resort Hotel Casino, the Palazzo Resort Hotel Casino, the Sands Expo and Convention Center in Las Vegas, and the Sands Casino Resort Bethlehem. The Company also owns and operates the Venetian Macao Resort Hotel and the Sands Macao in the People's Republic of China (PRC) Special Administrative Region of Macau. In addition, Las Vegas Sands Corp owns the Four Seasons Hotel Macao and is also developing the Marina Bay Sands integrated resort in Singapore.

The Las Vegas properties, situated on or near the Las Vegas Strip, form an integrated resort with approximately 7,100 suites, approximately 225,000 square feet of gaming space, a meeting and conference facility of approximately 1.1 million square feet and enclosed retail, dining and entertainment complex located within the Venetian and the Palazzo.

The Company owns and operates the Sands Macao, the first Las Vegas style casino in Macau. The Sands Macao offers approximately 229,000 square feet of gaming space and a 289 suite hotel tower as well as several restaurants, VIP facilities, a theatre, and other high end services and amenities.

The Company also owns and operates the Venetian Macao Resort Hotel which includes a 39 floor luxury hotel with over 2900 suites, approximately 550,000 square feet of gaming space, a 15,000 seat arena, retail and dining space of approximately 1.0 million square feet and a convention complex of approximately 1.2 million square feet. Located adjacent and connected to the Venetian Macao is the Four Seasons Hotel Macao which contains an additional 70,000 square feet of gaming space.

The Sands has selected a Table Games Shift Manager from the Venetian Las Vegas to be the Director of Table Games Operations for the Sands Bethlehem pending licensure from the Pennsylvania Gaming Control Board. He is a casino professional with more than 20 years of direct casino management experience. He has been at the Venetian Las Vegas since 1999 and listed below are some of his career highlights with our company:

- Hired during pre-opening phase of the Venetian Las Vegas project and assisted in casino training programs, guest service, games procedures and problem gambling programs.

- Supervision of all gaming operations.
- Managed high limit baccarat and blackjack ensuring guest satisfaction for all premium Asian and Domestic players.
- Interviewed and auditioned table game supervisors and dealers for potential employment.
- Responsible for implementing gaming operations policy and procedures through "Procedure of the Week" program.
- Coordinated with contractors and facilities department in maintaining the up-keep of the casino.
- Experience with casino credit.
- Working knowledge of hotel operations, casino marketing and strategic marketing.
- Procurement experience for table games equipment.



Appendix 9

Information and documentation to establish by clear and convincing evidence that the petition has the financial ability to pay the authorization fee under section 1316A (relating to table game authorization fee). (§1312A(b)(9)).

1. See the attached executed commitment letter from the Chief Financial Officer for our parent company, Las Vegas Sands Corp. **(REDACTED)**



Appendix 10

Detailed site plans identifying the petitioner's proposed table games area, including restricted areas associated with table games operations within the licensed facility or any proposed temporary facility. §1312A(b)(10).

1. See the attached site plans. **(REDACTED)**

Appendix 11

If the Petitioner is a Category 1 or Category 2 slot machine licensee, the signed waiver of rights form required by Sections 1312A(11) and 1315A(8).

1. See the attached waiver forms. (REDACTED)

Appendix 12

A description of the licensee's plan to provide training and instruction, or equivalent, for personnel that will be involved in table games. §§1302A(7) and 1323A(a).

Sands Bethworks Gaming LLC intends to partner with Northampton Community College to make available the training for the dealers needed to run the table game operations at the Sands.

Northampton Community College will purchase the training curriculum of the Casino Career Institute of Atlantic Cape Community College. The Sands intends to require all of its dealers to be proficient in a primary game and a secondary game. All dealers will be required to be proficient in Blackjack. This curriculum includes:

Introduction to Casino Games/Blackjack (Primary)

120 hours of training over a six week period required

This course will prepare the student for any primary or secondary game. The first two weeks will concentrate on correct chip handling techniques, identifying the value of each color chip, learning to read the total value of a bet and proper pit procedures. The student will also learn the roles of each position in the casino chain of command. The second two weeks will teach the fundamentals of dealing blackjack. Emphasis is placed on card totaling, chip cutting and handling, card shuffling and card placement. Special attention will be given to game and accounting procedures, accuracy and speed.

Baccarat/Mini/Midi Baccarat (Secondary)

80 hours of training over a four week period required

This course accommodates the experience, knowledge and skills in previous game training. Emphasis is placed on commissions and percentages and the ability to calculate them immediately.

Craps (Primary or Secondary)

160 hours of training over a six week period required

This course will teach the fundamentals of craps. Emphasis will be on the knowledge of the procedures on a variety of bets, accurate and quick mental multiplication and chip handling. Special attention is given to game and accounting procedures, accuracy and speed.

Poker (Primary or Secondary)

80 hours of training over a four week period required

This course will teach the fundamentals of dealing poker including the fundamentals of rake/antes/blind bets, game rules and regulations, game security and the dealer's responsibilities.

Pai Gow Tiles (Secondary)

160 hours of training over a six week period required

Based on ancient Chinese history, this game is played with a set of 32 dominoes. The object is to get "the supreme pair". Emphasis will be placed on rules of the game, commissions, security and game protection.

Roulette (Secondary)

80 hours of training over a six week period required

This course accommodates the experience, knowledge and skills in previous game training. Emphasis is given to accurate, quick mental multiplication, chip handling, memorization to table layout and accuracy of clearing the table.

Pai Gow Poker (Secondary)

80 hours of training over a four week period required

This course accommodates the experience, knowledge and skills in previous game training. Emphasis is placed on commissions and security.

Carnival Games (Secondary)

40 hours of training required

This course teaches the multiple variations of poker table games including Caribbean Stud, Let it Ride, Three Card Poker, Four Card Poker and Texas Hold'em. Focus is on poker rankings, procedures to pay and take, use of automated shuffler and house procedures.

As part of the certification course, Northampton Community College will also train all dealers in cardio pulmonary resuscitation (CRP).

The Sands will hire its Table Games Supervisory staff who will be assigned to Northampton Community College to train dealers from March 2010 to until they transition into the casino. Sands will supply the gaming tables and chairs required for the training start up. Northampton Community College will be responsible for the purchase of any table games training tables and chairs that will remain after the initial training rush and all operating supplies such as, table felts, chips and cards.

In addition to the training offered by Northampton Community College, The Sands in compliance with §527.3 will develop a training program which includes:

1. Procedures for opening and closing tables for gaming, including proper security procedures regarding table chip inventories.
2. Procedures for distributing gaming chips or plaques to and removing gaming chips and plaques from gaming tables.
3. Procedures for accepting cash at gaming tables.
4. Procedures for the acceptance of tips and gratuities from patrons.
5. Procedures for shift changes at gaming tables.
6. Procedures for the proper placement of wagers by patrons and the proper collection of losing wagers and payment of winning wagers.
7. Training in recognizing problem and compulsive gamblers at table games and procedures for informing supervisory personnel.

Appendix 13

Total anticipated investment by the licensee associated with table games (construction, renovations, etc.) and an estimate of the number of construction jobs involved. §1312A(b)(12).

Investment

The total anticipated investment associated with table games through funds from our parent company, Las Vegas Sands Corp., will be approximately \$26.6 Million.

Construction Job Creation

There will be approximately 100 construction jobs that will be created during the modification process of our facility to provide table games. These jobs will be located both on-site at the facility and at the off-site locations of our construction contractors. The types of jobs that will be created during construction will include those for Electricians, Carpenters, Laborers, Sprinkler Fitters, Alarm Technicians, Surveillance Technicians, Flooring, Painters, Glaziers, Millworkers, Metal Workers, Furniture Manufacturers, Upholstery Fabrication and Signage.