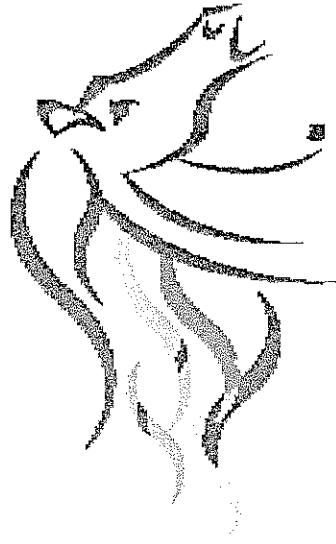


**MTR GAMING
GROUP, INC.**



P R E S Q U E I S L E D O W N S

Diversity Plan

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P R E S Q U E I S L E D O W N S

DIVERSITY PLAN POLICY STATEMENT

It is the policy of Presque Isle Downs (Presque Isle) to take affirmative action to enhance the diversity of our resort. The policy supports the company's strategic plan to achieve excellence in providing quality products and services to our guests.

Presque Isle is committed to promoting diversity initiatives that attract qualified candidates who are minority, female or disabled. Furthermore, the company is committed to:

- using job-related requirements to evaluate staff for promotion and applicants for employment;
- prohibiting discrimination on the basis of race, color, religion, gender, sexual orientation, age, national or ethnic origin, veteran status, or non-job-related disability; and
- complying with applicable federal, state and local laws.

The company is committed to basing its employment decisions on the principle of equal employment opportunity and to ensuring that all personnel actions, including, but not limited to, recruitment, hiring, training, promotion, compensation, benefits, transfer, layoff, and social and recreational programs are administered in accordance with the company's commitments to non-discrimination, equal employment and affirmative action.

The management of Presque Isle believes equal employment and affirmative action policies are a shared responsibility. The Director of Human Resources oversees Presque Isle's affirmative action program. The board of directors, vice presidents, department directors, department heads and hiring supervisors support the Director of Human Resources in maintaining the importance of affirmative action as a critical component of resort operations. The Director of Human Resources coordinates and implements policies and programs, monitors the company's efforts in these areas and reports results, and handles or refers complaints to appropriate company contact points. The broad-based, decentralized efforts of the community are key to meeting the company's equal employment opportunity and affirmative action commitments.

Through administration of these equal employment opportunity and affirmative action policies, the company intends to ensure that all people are included in the diversity that strengthens Presque Isle in its pursuit of excellence.

Any applicant or employee of Presque Isle who believes that he or she has received inequitable treatment because of discrimination violating Presque Isle's stated policy of equal opportunity in employment should communicate, either in writing or in person, with the Human Resources Department, PO Box 358, Chester, WV 26034, or by contacting the HR office at 304-387-8000.



P R E S Q U E I S L E D O W N S

DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS

The Company applies the following guidelines in developing and executing action-oriented programs:

1. Position Descriptions
 - a. Conduct detailed analysis of position descriptions to ensure that they accurately reflect the position functions and are consistent for the same position from one location to another. The analyses are conducted as the duties of a position change and are distributed to members of management, recruitment personnel, and referral sources.
 - b. Develop worker specifications using essential function criteria. Job requirements include education, experience, and skill requirements necessary to qualify for the job opening. Worker specifications are distributed to referral sources.
2. Hiring-Selection
 - a. Evaluate selection process periodically to ensure freedom from bias. Select and train personnel involved in the recruiting, screening, selection, promotion, discipline, and related processes. The recruiting, screening, referral, and selection process must demonstrate a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results
 - b. Observe the requirements of the "EEO UNIFORM GUIDELINES on Employee Selection Procedures" by performing periodic audits of personnel activities and the retention of records if adverse impact of minorities or women is noted.
 - c. Monitor the manner applicants are referred to Managers for hiring consideration to ensure the process is nondiscriminatory.
3. Compensation System(s)

Review compensation system(s) periodically to determine if there is apparent gender, race, or ethnicity-based disparities. Where the disparities cannot be justified in terms of performance, length of service, etc., corrective actions will be taken.
4. Recruitment Efforts

Establish recruitment efforts to maintain the flow of minority and female applicants:

 - a. Solicit minority, women's, and veteran's organizations and organizations concerned with disabilities for referral of applicants.
 - b. Offer briefings on premises with representatives from recruitment sources concerning current and future job openings.
 - c. Encourage minority, female, veteran, and employees with a disability to refer applicants for employment.
 - d. Participate in career day programs, using minority and female employees whenever possible.

- e. Expand "Help Wanted" advertising to include minority news media and women's interest media.
 - f. Establish recruitment efforts at schools with special programs to reach minorities, women, and persons with a disability.
 - g. Expand applicant poll with "Help Wanted" advertising to include minority news media and women's interest media, especially for those job groups with Placement Goals.
 - h. Encourage community child care, housing, and transportation programs designed to improve the employment opportunities for minorities, women, and persons with a disability.
 - i. Ensure that job openings have been listed with the State Job Service.
5. Promotions
- Ensure that all employees are given equal opportunity for promotion:
 - a. Communicate promotional opportunities.
 - b. Maintain an inventory of academic skills and experience level.
 - c. Initiate job training and work-study programs wherever possible.
 - d. Conduct employee performance evaluation programs.
 - e. Provide clearly define job specifications.
6. Career Counseling
- Monitor career counseling to ensure that all employees are given equal opportunity for career counseling:
 - a. Counsel employees relative to advancement opportunities open to them and the training programs available to assist them in their career development.
 - b. Instruct managers and supervisors to keep the Equal Employment Opportunity Coordination informed of all action taken in career counseling.
7. Training
- Give all employees equal opportunity to attain training:
 - a. Announce training opportunities.
 - b. Develop training programs that enhance advancement potential.
 - c. Coordinate training programs for workforce development.



P R E S Q U E I S L E D O W N S

DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION OF DIVERSITY PLAN

The Director of Human Resources has been designated as the Equal Employment Opportunity Coordinator of the company and has the full support of the president and other top management in carrying out these duties.

This company's philosophy and policy on equal employment opportunity and affirmative action is set out in its corporate employment policy and in its company handbooks.

The Director of Human Resources, as Equal Employment Opportunity Coordinator, has the following responsibilities:

- Develop policy statements and internal and external communication of those policies
- Develop action-oriented programs that establish goals and objectives to remove identified barriers to minority and female employment and expand employment opportunities for those groups.
- Measure the effectiveness of all affirmative action programs.
- Design and implement audit systems.
- Serve as liaison with enforcement agencies.
- Serve as liaison with minority and women's groups and with disabled and veteran's groups.
- Keep management informed of the latest developments in the entire equal opportunity area.
- Provide career counseling for employees.
- Make sure that posters are properly displayed.
- Make sure that all facilities are desegregated.
- Maintain the prior years' diversity plan and all related documents.
- Maintain all required records.



P R E S Q U E I S L E D O W N S

HR Recruiter Procedures

After Recruiter receives an approved request for hire the following steps will be taken:
Must be signed off by the Department Head and Human Resources

1. Recruiter posts the open position at designated employee locations on property:
 - Recruiter will interview all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.
 - If no qualified applicants are found, Recruiter will proceed to the next step.

 2. Recruiter will contact the local employment service agencies, Affirmative Action Agencies, local colleges and technical schools:
 - a. **PA Career Link**
 - www.pacareerlink.state.pa.us
 - b. **Pittsburgh Culinary Institute**
 - Heather Stefkovich 412-325-3193
 - <mailto:HSTEFKOVICH@paculinary.com>
 - c. **Pittsburgh Technology Institute**
 - Cindy Lubinski 412-809-5279
 - <mailto:lubinski@pti-tec.com>
 - d. **Erie County Technical School**
 - 814-864-0641
 - www.ects.org
 - e. **Penn State Erie**
 - **The Behrend College**
 - www.psenie.psu.edu
 - f. **Edinboro University of Pennsylvania**
 - [Webs.edinboro.edu](http://webs.edinboro.edu)
 - g. **NAACP – Region II**
 - Allentown 610-682-9096
 - Easton PA Branch 610-252-7099
 - h. **Vietnam Veterans of America – Chapter 435**
 - Erie, PA 814-899-2858
 - i. **Veterans Outreach and Assistance Center**
 - 15 East 12th Street 814-453-5719
 - Erie, PA 16501
 - j. **Hispanic-American Council Community Center**
 - 554 East 10th Street 814-455-0212
 - Erie, PA 16503
 - k. **National Organization for Women**
 - N.W.P.A.
 - PO Box 93
 - Edinboro, PA 16412
- President: Susan Woodland - nwpanow@surferie.net

I. Bureau of Minority and Women Business Opportunities

- Main Office 717-787-6708
Room 611 North Office Building
Harrisburg, PA 17125
- www.dgs.state.pa.us/bcabd/site/default.asp

- Recruiter will interview all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.
 - If no qualified applicants are found, Recruiter will proceed to the next step.
3. Recruiter will contact the local newspapers to post the open positions:
- Contact Marketing

Local Papers

- a. **Meadville Tribune**
 - www.meadvilletribune.com
- b. **Erie Times**
 - www.goerie.com

High Volume City Papers

- c. **Pittsburgh Post Gazette**
 - Rick Kane 412-263-1275
<mailto:rkane@post-gazette.com>
- d. **Youngstown Vindicator**
 - Classified Advertising 330-747-7981
- e. **Buffalo News**
 - www.buffalonews.com
- f. **The Plain Dealer – Cleveland**
 - www.plaindealer.com
- g. **The Post Journal – Jamestown, NY**
 - www.post-journal.com

- Recruiter will interview all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.
- If no qualified applicants are found, Recruiter will proceed to the next step.

4. Recruiter will post open position on selected online recruiting web-sites:

- a. www.Monster.com
 - Sang Lee 703-269-0141
- b. www.Employmentguide.com
 - Terry Nickle 412-257-2979 x223
<mailto:terry.nickell@employmentguide.com>
- c. www.ihirehospitality.com
 - 877-798-4854
- d. www.Careerbuilder.com
 - Tim Hennessey 773-527-5614
<mailto:Tim.hennessey@careerbuilder.com>
- e. www.Casinocareers.com
 - 609-813-2333
<mailto:info@casinocareers.com>

- Recruiter will interview all qualified applicants, both internal and external, and will forward any favorable applicants to the manager of the department with the open position.
 - If no qualified applicants are found, Recruiter will proceed to the next step.
5. Recruiter will notify Human Resources and the Department Head that there are no current local applicants qualified for the position. Necessary steps will be taken to fill the position.

Note: Steps may be run simultaneously depending on the nature of the position.



PRESQUE ISLE DOWNS

HR Recruiter Procedures Checklist

HR Recruiter: _____

Department: _____ Position: _____

1. Date Recruiter Posted the open position internally: _____

2. Local employment service agencies, local colleges and technical schools, Affirmative Action Agencies and the date posted:

a. _____

b. _____

c. _____

d. _____

e. _____

f. _____

3. Local newspaper contacted with date contacted and date published:

a. _____

b. _____

4. High volume city paper contacted with date contacted and date published:

a. _____

b. _____

5. Online recruiting website contacted and date job was posted:

a. _____

b. _____

6. Date Recruiter contacted the Director of Human Resources and Department Head that there are no current local applicants qualified for the positions:

a. _____



PRESQUE ISLE DOWNS

DISSEMINATION OF AFFIRMATIVE ACTION POLICY

Dissemination of Policy

Presque Isle Downs has established various channels of communication to ensure that employees and the community are aware of the company's positive posture toward equal employment opportunity (EEO) and affirmative action.

Internal Dissemination

The diversity plan is stated as part of Presque Isle Downs, Inc.'s employee relations policy and is covered in our employee policies & procedures.

Formal presentations are made to management, supervisors, and employees from time to time concerning affirmative action. The Diversity Plan is developed each year with the assistance of key line manager and staff members. If hiring takes place, regular updates are given to local and corporate management on progress in remedying underutilized areas. In those units where employees are represented by a collective bargaining agent, the unions are formally made aware of this policy.

In management and supervisory training, the entire concept of affirmative action is covered. Our policy and its implementation are reviewed; the policy is included in our management policy manual.

When we hire, new employees are formally made aware of our policy on affirmative action and anti-harassment, sex discrimination guidelines, and the Equal Pay Act. This policy is posted on a number of plant and office bulletin boards at this location.

Key local management and support personnel undergo EEO and affirmative action training from time to time. Supervisors and managers participate in the review of underutilized categories and in the setting of affirmative action goals.

When we feature employees in our employee publications, minorities and women are included.

Our local affirmative action program is monitored on a quarterly basis by our headquarters office.

External Dissemination

As part of our policy of good communication, this facility has notified appropriate recruiting sources and the headquarters offices of the unions with whom we deal on the company's policy concerning EEO and affirmative action. When hiring occurs, we request referral of qualified women and minorities for all positions.

Our customers, contractors, and various community groups have been notified of our policies. The company communicates its commitment to EEO by recruitment advertising through regular media and through minority and women's publications.

Minority and non-minority men and women are pictures in product and consumer advertising and in our annual report.

Written notification of EEO policy, as well as requests for certification regarding compliance with EEO laws, is sent to suppliers and subcontractors. We require that EEO clauses be incorporated as part of all purchase orders and contracts.

All "Help Wanted" advertisements carry the notice "Equal Opportunity Employer M/F", and this designation is included in recruiting brochures and literature.

Overall Totals		White	Black	Hispanic	Asian/Pacific Islander	Am. Indian/Alaskan Native	White	Black	Hispanic	Asian/Pacific Islander	Am. Indian/Alaskan Native
Office/Manager											
Professionals											
Technicians											
Sales Workers											
Officer/Clerical											
Craft Workers(Skilled)											
Operatives(Semi-skilled)											
Laborers											
Service Workers											
Total Employees	0	0	0	0	0	0	0	0	0	0	0

Male 0.0%
 Female 0.0%
 White 0.0%
 Black 0.0%
 American Indian/Alaskan Native 0.0%
 Asian/Pacific Islander 0.0%
 Hispanic 0.0%

Business Facts**Erie Pennsylvania**

Manufacturers shipments, 1997 (\$1000)	1,788,955	11,600,008
Wholesale trade sales, 1997 (\$1000)	487,417	159,354,185
Retail sales, 1997 (\$1000)	772,261	109,948,462
Retail sales per capita, 1997	\$7,432	\$9,150
Accommodation and food services sales, 1997 (\$1000)	81,011	12,227,177
Total number of firms, 1997	5,907	837,756
Minority-owned firms, percent of total, 1997	9.70%	5.90%
Women-owned firms, percent of total, 1997	15.40%	24.20%

Geography Facts**Erie Pennsylvania**

Land area, 2000 (square miles)	22	44,817
Persons per square mile, 2000	4,722.90	274
FIPS Code	24000	42

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.



PRESQUE ISLE DOWNS

Erie, Pennsylvania City Facts

People Facts	Erie	Pennsylvania
Population, 2000	103,717	12,281,054
Population, percent change, 1990 to 2000	-4.60%	3.40%
Persons under 5 years old, percent, 2000	7.20%	5.90%
Persons under 18 years old, percent, 2000	25.40%	23.80%
Persons 65 years old and over, percent, 2000	15.40%	15.60%
Female persons, percent, 2000	52.40%	51.70%
White persons, percent, 2000 (a)	80.60%	85.40%
Black or African American persons, percent, 2000	14.20%	10.00%
American Indian and Alaska Native persons, percent, 2000 (a)	0.20%	0.20%
Asian persons, percent, 2000 (a)	0.70%	1.80%
Native Hawaiian and Other Pacific Islander, percent, 2000 (a)	Z	Z
Persons reporting some other race, percent, 2000 (a)	1.90%	1.50%
Persons reporting two or more races, percent, 2000	2.30%	1.20%
Person of Hispanic or Latino origin, percent, 2000 (b)	4.40%	3.20%
Living in same house in 1995 and 2000', pct, pct age 5+, 2000	56.20%	63.50%
Foreign born persons, 2000	4.20%	4.10%
Language other than English spoken at home, pct age 5+, 2000	9.20%	8.40%
High school graduates, percent of persons age 25+, 2000	79.90%	81.90%
Bachelor's degree or higher, pct of persons age 25+, 2000	17.40%	22.40%
Mean travel time to work (minutes), workers age 16+, 2000	16.3	25.2
Housing units, 2000	44,971	5,249,750
Homeownership rate, 2000	56.20%	71.30%
Median value of owner-occupied housing units, 2000	\$65,900	\$97,000
Households, 2000	40,938	4,777,003
Persons per household, 2000	2.39	2.48
Median household income, 1999	\$28,387	\$40,106
Per capita money income, 1999	\$14,972	\$20,880
Persons below poverty, percent, 1999	18.80%	11.00%



P R E S Q U E I S L E D O W N S

August 12, 2005

To Whom It May Concern:

In recognition of its role as a contributing citizen and its sincere and effective effort to provide equal opportunity, Presque Isle Downs, Inc., has adopted all procedures contained in our Diversity Plan as a matter of policy. It is our policy to take whatever affirmative action necessary to offer equal employment opportunity regardless of race, color, religion, age, sex, physical or mental disability, covered veteran status, or national origin provided that the applicant is qualified for the position and to ensure that personnel actions, such as recruitment, selection, placement, testing, training programs, promotions and transfer, layoffs and recalls, terminations, disciplinary actions, social and recreational programs, and all employee benefits and compensation are equally applied. A copy of our policy statement is attached.

I personally make my commitment that all of the objectives of equal employment opportunity shall be fulfilled for all. I will expect the cooperation of all employees of Presque Isle Downs, Inc., to meet these goals and to exercise leadership toward the accomplishment of these ends.

Very truly yours,

Human Resources Director



P R E S Q U E I S L E D O W N S

VENDOR DIVERSITY PLAN POLICY STATEMENT

It is the policy of Presque Isle Downs (Presque Isle) to assist in providing economic opportunities for disadvantaged and emerging small businesses and make reasonable good faith efforts to achieve these goals.

Presque Isle is committed to promoting diversity initiatives that attract qualified contractors, subcontractors, assignees, lessees, agents, suppliers, and vendors who are minority, female or disabled. To the extent feasible, the company is committed to:

- Contracting or transacting directly with minority and women's business enterprises.
- Contracting with a non-minority business enterprise under terms and conditions that establish a participation plan.

The management of Presque Isle believes vendor diversity is a shared responsibility. The Operations Controller oversees Presque Isle's vendor diversity program. The general manager, department directors, department heads and contracting supervisors support the Operations Controller in maintaining the importance of vendor diversity as a critical component of resort operations. The Operations Controller coordinates and implements policies and programs, monitors the company's efforts in these areas, reports results, and handles or refers complaints to appropriate company contact points.

Through administration, monitoring, and communication of this policy, the company intends to ensure that all people are included in the diversity that strengthens Presque Isle in its pursuit of excellence and enhancing the representation of diverse groups in the operation.

Any contractor, subcontractor, assignee, lessee, agent, vendor, or supplier of Presque Isle who requires additional information regarding this policy should communicate, either in writing or in person, with the Director of Purchasing, PO Box 358, Chester, WV 26034, or by contacting the purchasing department at 304-387-8000.



PRESQUE ISLE DOWNS

DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION OF VENDOR DIVERSITY PLAN

The Operations Controller has been designated as the Vendor Diversity Coordinator of the company and has the full support of the general manager and other top management in carrying out these duties.

The Operations Controller, as Vendor Diversity Coordinator, has the following responsibilities:

- Develop policy statements and internal and external communication of those policies
- Develop action-oriented programs that establish goals and objectives to remove identified barriers to disadvantaged, female, and minority contractors, suppliers, and vendors and expand opportunities for those groups.
- Educate management staff on the requirements of the program.
- Design appropriate procedures that enable effective monitoring of the program.
- Measure the effectiveness of the programs.
- Design and implement audit systems.
- Prepare analysis of diversity program progress on a quarterly basis and communicate the results to Management.
- Serve as liaison with regulatory agencies.
- Serve as liaison with minority, women's, disabled, and veteran's groups.
- Keep management informed of the latest developments.
- Maintain the prior years' diversity plan and all related documents.
- Maintain all required records for a minimum of five years.



P R E S Q U E I S L E D O W N S

DEFINITIONS

The Company applies the following guidelines in defining the business categories and terminology addressed within this program:

1. Good Faith Effort
 - a. Means a reasonable effort to accomplish goals and objectives.
2. Minority-Owned Business Concern
 - a. The term "minority-owned business concern" refers to a minority business that is at least 51 percent owned and controlled by groups recognized as being socially and economically disadvantaged. "Control" in this context means exercising the power to make policy decisions. "Operate" in this context means actively involved in the day-to-day management of the business.
 - b. Socially and economically disadvantaged individuals include African-Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, and Asian Indian Americans, found to be disadvantaged by Federal Government Agencies empowered to make this determination.
3. Physically Challenged Owner
 - a. The term "physically challenged owner" refers to a business that is at least 51 percent owned by an individual or individuals with a disability, i.e. "a physical or mental impairment which substantially limits one or more major life activities" (as defined by the Americans With Disabilities Act of 1990, 42 U.S.C. section 12111 et seq., its interpretive regulations, 29 C.F.R. part 1630, and case law) who also control(s) and operate(s) it. "Control" in this context means exercising the power to make policy decisions. "Operate" in this context means actively involved in the day-to-day management of the business.
4. Small Disadvantaged Business Concern
 - a. The term "small business concern owned and controlled by socially and economically disadvantaged individuals" means a "small business concern" (a) which is at least 51 percent owned by one or more socially and economically disadvantaged individuals; or, in the case of any publicly owned business, at least 51 percent of the stock of which is owned by one or more of such individuals and (b) whose management and daily business operations are controlled by one or more of such individuals in the day-to-day management of the business.
 - b. Socially and economically disadvantaged individuals include African Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, and other minorities or individuals, including subcontinent Asian Americans, found to be disadvantaged by Federal Government Agencies empowered to make this determination.

5. Veteran-Owned Business Concern

- a. The term "veteran-owned business concern" is a business that is at least 51 percent owned by a veteran or veterans who also control and operate it; "control" in this context means exercising the power to make policy decisions; "operate" in this context means actively involved in the day-to-day management of the business.

6. Women-Owned Business Concern

- a. The term "women-owned business" is a business that is at least 51 percent owned by a woman or women who also control and operate it. "Control" in this context means exercising the power to make policy decisions. "Operate" in this context means actively involved in the day-to-day management of the business.

Presque Isle Downs, Inc.

A. Company Name and Address

Company Name _____

Contact Name _____

D/B/A (if applicable) _____

Phone # _____

Fax # _____

Address _____

Company Website _____

City, State, Zip Code _____

Email Address _____

Federal Tax No. (ID#/Social Security #) _____

State Sales Tax # _____

Payment Terms _____ Discount Terms _____

B. Type of Business (Check all that apply)

Corporation
 Individual
 Partnership

Large Business
 Small Business
 Disadvantaged Business

Distributor
 Manufacturer
 Other

C. Business Information

We are committed to the purchase of goods and services from minority and woman owned businesses. Please check the category (s) in which your business falls and complete attached corresponding paperwork:

Woman-Owned _____ Minority-Owned _____

Type of Business/Goods or Services: _____

Number of years in business providing goods and/or services? _____

Number of Employees: _____

Total Customer Base: _____

Existence and nature of warehouse and storage facilities. (Photo)

Existence and number of commercial delivery vehicles owned or leased. _____

Are the goods and/or services provided to the licensee brokered, and if so from where? _____

Presque Isle Downs, Inc.

Based on the aforementioned information on this page, please check the categories that accurately describe your company's status/ownership:

- _____ American Indian or Alaskan Native _____ Hispanic
_____ Caucasian _____ African American
_____ Asian or Pacific Islander _____ Female

Please list the names of your company's owners and officers:

NAME	TITLE	OWNERSHIP %
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

This form must be completed and returned to Presque Isle Downs, Inc. prior to any contract, agreement, or shipment. This information is critical in setting up an account and for the issuance of a purchase order, which guarantees payment.