



COMMONWEALTH CASINO COMMISSION
Commonwealth of the Northern Mariana Islands
P.O. Box 500237 Saipan, MP 96950



MINUTES
February 22, 2018

I. PRELIMINARIES:

A. Call to Order

Chairman Juan M. Sablan called the meeting to order at 10:09 am on Tuesday, February 22, 2018 at the Joeten-Kiyu Public Library (Technology Room) in Susupe, Saipan.

B. Roll Call

Commissioners present at the meeting were: Juan M. Sablan (Chairman), Joseph C. Reyes (Vice Chairman), Justin S. Manglona (Secretary), Alvaro A. Santos (Treasurer), Martin DLG. San Nicolas (PA & MR Officer).

C. Adoption of Agenda

Vice Chair Reyes moved to adopt the agenda as presented, seconded by Commissioner Manglona. The motion was put to a vote and unanimously adopted.

D. Adoption of the Minutes. January 30, 2018

Vice Chair Reyes moved to adopt the minutes of meeting of January 30, 2018, seconded by Commissioner Manglona.

Discussion: Vice Chairman Reyes shared that he had some areas of concern in the minutes which he hopes will be addressed under the Executive Director's Report.

Chairman Sablan noted that clarification is needed on the number of hotel rooms required on the Casino License Agreement (CLA) versus previous reports from Mr. Eric Poon. The CLA requires 329 rooms but Mr. Poon mentioned that only 250 rooms will be completed by August 31, 2018. He advised Mr. Poon to look into the matter and to immediately address the discrepancy.

The motion was put to a vote and was unanimously approved.

II. REPORTS:

A. Report by the Chairman

Chairman Juan M. Sablan reported that on February 13, 2018 the Commission appeared before the Senate Committee on Gaming and presented its comments on Senate Bill 20-87 "To amend 4 CMC § 2313(b) to increase the number of casino commissioners to seven and to make 1 CMC § 2901 applicable

to the commission; and for other purposes.” He noted that the Commission currently consists of five commissioners and that the Commission is not in support of the bill due to the fact that it’s an unfunded mandate. He stressed that the Commission’s operational funds are limited to just the casino regulatory fee. In addition to this, the current number of members are consistent with other casino jurisdictions in the CNMI such as Tinian and Rota with only five members. The Chairman also noted that the current members are effective and efficient in administering all the mandates required by PL 18-56 and PL 19-24, and the casino regulations.

The Chairman announced that he met with Senator Justo Quitugua, Chairman of the Senate Gaming Committee regarding the urgent need to introduce a bill to allow two-terms for Commissioners. He noted that Tinian Commissioner San Nicolas, and Rota Commissioner Manglona’s terms will soon expire. He shared that a bill has already been prepared which will be sponsored by Senator Jude Hofschneider. It is the Commission’s understanding that the bill will be introduced today (Feb 22, 2018). He added that he also met with House Gaming Committee Chairman Joseph Deleon Guerrero who suggested that it would be best if the Senate initiated action on the bill. He explained that in this way, the need for the proposed bill to go into the House Committee on Gaming will be eliminated and action on the house floor can be quicker. Chairman Sablan commented that the Commissioner prefers whichever route is quicker route because time is running out on the matter.

Chairman Sablan reported that he, along with the Executive Director, Chief, and Commissioner Manglona met with Mr. Ed Chen, IPI CFO, and Chuck McDonald, VP of Compliance to discuss the collection efforts made by IPI in its receivables and status of payments on their accounts payable. He noted that they also briefly discussed the notes and recommendations he presented to the Commissioners on February 15, 2018. He urges the Commissioners to take his recommendations seriously and offered to hold further discussions in executive session.

The Chairman reported that he, Commissioner Manglona and the Director met with the Governor to discuss the pending House Bill 20-82. The Governor suggested that a follow up meeting is necessary to allow for the thorough review of the contents of HB 20-82 before he recommends further action by house. He said that the Commission is now waiting for the date of the follow-up meeting with the Governor.

B. Report by the Executive Director

The Director reported the following:

Senate Committee on Gaming: As discussed earlier in the Chairman’s report, the Commission did not object to SB 20-87 in principal but more so because of the financial impact it will impose on the Commission.

Commissioner’s Term of Office: The original law that created the casino, Public Law 18-56, specified that the term of office for each Commissioner shall not exceed two terms. The statute did not imply that Commissioners will serve a second term automatically, but it also does not restrict the appointing authority from deciding whether to reappoint or to let the terms expire. Public Law 19-24 which amended Public Law 18-56 made a statement that each shall serve one term, but it said only one term. This is an issue that could be challenged or the Commission could try to correct it through legislation. The Commission attempted to do just that in the original version of HB 20-82 but it was deleted in the HB 20-82, HD1 version. Initially, if the Commission looks at the term of office, at the time that PL 18-56 was passed, the CNMI Government was experiencing the same issue on two different boards in which there was no clarity on when the term

of office began. This issue affected the Tinian Casino Gaming Control Commission and the Northern Marianas College Board of Regents. To avoid any misunderstanding, PL 18-56 specifically stated that the term of office for Commissioners shall begin on May 1, 2014, regardless of when the Commissioner was appointed, confirmed, or sworn in. None of the Commissioners served since May 1, 2014.

The Director adds that a tremendous amount of training and resources have been spent on the current Commissioners to ensure that they are as close to experts in dictating the policies in the CNMI's gaming industry. The Commissioners are the CCC, and it would not be in the best interest of the Commonwealth to see them removed purely due to a statutory mandate that restricts their reappointment; the issue should be left to the appointing authority to decide but a second term should be allowed by statute.

Commissioner Santos shared his concern on the matter and asked Counsel Ernest for his opinion. He stated that he is still bothered by the fact that May 1, 2014 is still being considered the effective date of Commissioner's term regardless of when the Commissioners actually started serving as members which is upon taking their oath. Commissioner Santos asked Counsel Ernest if the date of May 1, 2014 can legally hold. He further explained that although PL 18-56 states that the term officially begins May 1, 2014, the Commissioners could not function and did not do anything official until November of the same year. Counsel Ernest advised that he will have to do his research in regards to the Savings Clause in PL 19-24 which states it wasn't going to affect any rights that were in existence prior to that. He noted that Commissioner Santos may have a valid claim which could probably be resolved between the Attorney General's Office and the Department of Finance. In his opinion, he explained that the Commissioners may have a right that their terms began on the date they were sworn in. However, there were subsequent legislation to change that but if it's determined that PL 19-24 did not affect any existing rights, the members will have a good claim that that portion does not apply to them. He announced that he'll need to do further research on the matter to be certain.

CCC Financial Update: Balance as of January 31, 2018 from FY2016 to FY2018 Funding Sources:

1) 7170:	\$ 594,729
2) 7079A:	\$ 2,498,485
3) 7171:	\$ 550,000
4) 1545:	\$ 1,090 (Local appropriations)

The balance of Account 7079A will be reduced to \$300K after deducting compensation for all personnel, board, and rental through December 2018. \$2.1 Million of funds have been encumbered.

Portions of FY2017 funds are still being processed and reconciled pending a final audit report. Account 7170A has been closed and balances were transferred to 7079A.

Funds available under 7171 totaled \$945,153. \$550,000 of this amount was appropriated to the CCC in FY2018 Budget Appropriations (P.L. 20-11) and \$395,000 is available for appropriations to CCC in FY2019.

Office Space: The Commission anticipates to be able to occupy the second floor sometime in March. The divisions that will move up are the Executive Office, Audit, and Compliance. A larger conference room will also be built on the second floor to accommodate the monthly meetings.

Vice Chair Reyes asked the Director if he foresees any issues from government permitting agencies, most especially on meeting the requirements of the American Disabilities Act (ADA). The Director replied that it is the landlord's responsibility to ensure that the facility being rented is in compliance with all rules and regulations including ADA. However, in the interim, the Director explained that the conference room on the first floor can be made available for anyone with a disability to attend the meeting via video conference. He noted that there is not enough space on the first floor to expand the existing conference room and the only option was on the second floor.

Recruitment of New and Vacant Positions: We currently have 44 FTEs, we are requesting for two additional to bring it to 46.

Commissioner Santos inquired if additional employees will be needed once the IPR is fully completed. The Director replied that the Commission will definitely need more employees which is why he included 5 unfunded FTE's in his FY 2019 Budget Request.

Junket Applications: No update.

Miscellaneous Matters: Bloomberg visited Saipan more than a year ago and even met with the Commission. Recently, an article written by Matthew Campbell was published, titled "Chinese casino has conquered a piece of America". The article took perhaps what could be considered facts, and then alluded or began to accuse the Commonwealth, after spending only a few days on Saipan, he appears to be the expert on how "corrupted" the CNMI is. He somehow dragged Commission into the picture as being a part of the grand conspiracy to allow IPI to go running amok. It's farthest from the truth, but in this is a situation, in a democracy like ours, the freedom of press is so constitutionally protected that it is very difficult to defend ourselves. The individual who wrote the article came to the Commission, spent a couple hours meeting with the Commission, then he proceeded to list out in his article quite a bit of information that was purely exaggerated.

The Commission contacted Mr. Campbell before the article was printed, to ask him what his factual points were. He then sent the Commission fourteen points, all of which were reviewed and responded to by the Commission.

The Director publicly announced that if there is anyone in the Commission, or anyone in the community, who knows of any individual at the Commission receiving anything of value or being paid under the table by IPI, to please come forward with the information as it is their duty to do so. The information received will then be recorded by the Commission and reported to the police, the public auditor, and possibly to the FBI. Such individuals will be immediately terminated as this type of activity will not be tolerated by the Commission. He notes that everyone in the Commission is doing their job and in his opinion, the Commission has the best people the CNMI has to offer. He emphasized that the Commission is watching, regulating, and when necessary, ready to sanction the licensee.

In an emotional tone, Chairman Sablan added that he was very upset to read the Bloomberg article because a lot of what was stated were false information. He announced that he and the Commissioners are doing their job, and that no one is corrupt. He explained that the Commission frequently updates its regulations, and has tightened its regulations to ensure that IPI is in compliance with all mandates, all of which are in the best interest of the Commonwealth. He welcomed anyone in doubt to attend the monthly Commission and to witness that IPI is questioned on every little detail pertaining to its activities. He reiterated the Director's earlier statement and invited anyone who has information of any corrupt activities in the Commission to come forward.

The Director recommended in the near future, it may be necessary for the Commission to sit down with the Governor and the Legislature, particularly the Committees on Gaming in both houses, to discuss the perimeter of the scope of work that the Commission is responsible for. The Commission's primary responsibility is to regulate the gaming industry but in the past few months, it seemed that the Commission was held accountable for matters concerning zoning, building safety code, traffic congestion, public health, labor and immigration. He stated that it will be absurd for anyone to expect the Commission to handle and be responsible for the compliance of each of the aforementioned regulations, in addition to the fact that the Commission does not have the authority to do so.

III. PUBLIC COMMENTS:

Counsel Ernest informed the Commission of the existence of House Bill 20-148, which seeks "To prohibit the operation of vehicles with a gross vehicle weight in excess of 4,000 pounds between 6:00 AM to 9:00 PM from the Beach Road and Micro Beach Road Intersection to the Beach Road and Chalan Monsignor Guerrero Road Intersection". He noted that this would only leave 9 hours out of a 24-hour day for any construction activities to occur, equivalent to only 37% of operational time. If this bill is passed, it will greatly impact the construction of IPR, so it would be best interest to inform the licensee. Counsel Ernest also added that completing the project on time as required by the CLA may be difficult at best, but with the proposed bill, may now be impossible. He said some sort of amendment would likely be necessary.

IV. MISCELLANEOUS MATTERS - Casino Licensee (IPI) Updates:

A. Casino Licensee (IPI) Updates:

1. Construction Progress- Imperial Pacific Resort & Hotel & Roadways

Mr. Eric Poon, IPI Construction, presented the Commission with the Imperial Pacific Resort Progress Report which covers up to the period of February 20, 2018. Please see attached Exhibit 1.

Mr. Poon highlighted the following key issues on his report:

On February 13, 2018, a second contract has been executed and signed with Pacific Rim, which is the implementation phase. During the last Commission meeting, it was mentioned that the first contract was signed which was the pre-construction phase. It's been three weeks since the first contract was signed and a lot of work has been done between the general contractor and the local consultants, including the evaluation and assessment of the existing building. Until the report is done on the matter, the general contractor is unable to plan the next phase of construction. IPI is very pleased with the work completed thus far between the general contractor, local consultants and IPI's team, and the work is continuing in order to determine the next phase of construction.

IPI has secured approval of 1,044 H2B visas and are now working with the candidates to bring them on board at the earliest possible date based on the type of trade needed at the given time. The anticipated date of arrival of the first batch of workers is early March 2018. The

number of construction workers for the month of February 2018 is 216, as opposed to the 190 stated on the Progress Report. The increase in the number of workers was a result of the contract with Pacific Rim. There is a combination of two teams consisting of the project management team and the engineers, also known as the workers.

Vice Chair Reyes inquired if anyone is addressing the deficiencies that have been identified with the construction and are there corrective actions in place. Mr. Poon confirmed that they have identified the defects which will be incorporated in Pacific Rim's report. He noted that the report is nearly completed, and there are plans on how to address the deficiencies on the site.

Vice Chairman Reyes asked if the contract has been consummated in which Mr. Poon replied yes. He pointed out to page 7 of the construction progress report and explained that the building facade at the resort hotel, north wing, still has have a lot of structural steel exposed, however some stone cladding has already been completed on one of the elevations of the north wing. Mr. Poon further reported that the loft courtyard in front of the property was opened. Although temporary, it was opened in an attempt to improve the overall look of the front of the casino by removing the hoarding. Mr. Poon shared that there are also plans to make the fountains functional, and that IPI is still planning some landscaping work to further improve the overall look.

In reference to page 8 of the report, Mr. Poon pointed out that the continues deflection separation (CDS) system is currently being installed which was contracted to USA Fanter. The target date of completion for the CDS (drainage system) is mid-April.

Vice Chairman Reyes mentioned that this has been discussed for some time now, and that all he wants to move forward and complete the project but in the correct way and with safety as a priority. He also expressed that while IPI is making good effort in addressing the issue of manpower, he is concerned about the availability of funding to complete the project. Chairman Sablan noted that discussions on the licensee's financial position will be discussed in executive session.

Commissioner Santos asked if the 1,044 construction workers, holding H2B visas, is a sufficient number of workers to complete the 329 rooms by August 31, 2018. Mr. Poon replied that all this time, IPI was focused on the completion of only 250 rooms by August 2018. However, in light of the 329 rooms, IPI is working with the general contractor to determine how the 329 rooms can be completed with the current manpower and the schedules that are already in place.

Commissioner Santos sought clarification on the requirement of H2B visas. He asked whether this type of work permit is valid only for the duration of the construction project, and are the workers required to return home upon completion. Mr. Poon confirmed that Commissioner Santos is correct. Commissioner Santos then asked if the manpower for the hotel operations will be a different set of workers as it will require a continuing service, in which Mr. Poon responded that yes.

The Director asked if IPI has a monitoring system in place to verify if the workers on the construction site from GPPC, Sinopan, Pacific Rim, Dragon Chen, and AM have legal working permits as he does not want a repeat of the last incident. Mr. Poon assured the Commission that they have procedures in place and personnel assigned to check worker's IDs and

documentation on a daily basis. He further added that workers are provided passes as they clock in daily and random ID checks are being done. The Director then reminded Mr. Poon to ensure that any vendor doing business with IPI with a transaction in excess of \$250,000 must be licensed by Commission as a non-gaming vendor. He added that Commission maintains a listing of all the employees under the vendor. Mr. Poon confirmed that IPI and its vendors are aware of the requirement.

Chairman Sablan cited a section in the Pacific Rim contract which stated that the hotel tower, levels 3-11, consisting of 250 rooms, will be completed by August 18, 2018. However, the completion date of the remaining hotel tower, casino podium, beach club, and the hotel landscaping is May 31, 2019. He stressed that the only way the May 31, 2019 can be acceptable is through the amendment of the CLA. Chairman Sablan suggested that it will be an opportune time to discuss the minimum number of rooms to be completed by the August 2018 deadline. He recommended IPI's legal team initiate discussion with the Lottery Commission to address the matters. Mr. Phil Tydingco, IPI Counsel, informed the Commission that he is preparing his recommendation on the matter, and that Mr. Poon is unable to address the Chairman's concern. Chairman Sablan elaborated that as it stands, the Pacific Rim contract is in contradiction with the CLA.

Counsel Tydingco explained that the contract was designed to accomplish the job in a safe engineering manner and in consideration of what's achievable based on the negotiations between the engineers and the construction company. He said that the contract was executed notwithstanding the separate CLA and amendments. He noted that the CLA is a separate legal issue and apart from the fact that the company, its owners and the contractors needed to negotiate what was believed to be accomplishable in a safe construction engineering manner. He explained that if there are any issues with the inconsistencies, it should be deferred to him as legal counsel. However, lawyers cannot dictate what can be completed in a safe construction engineering manner.

The Director asked Mr. Poon if he has discussed with Pacific Rim whether or not they will be able to complete the additional 79 rooms by August 2018 to fulfill the required 329 rooms. Mr. Poon said that it was discussed, but the calculation and engineering of this project was based on the 250 rooms which is achievable by the August 2018 deadline with the over 1,000 construction workers and the available materials on island. It will be one shift, from 7 AM to 4 PM daily, he said. If it is determined that a second shift is needed to accelerate the construction in order to meet the deadline, IPI will do so.

The Director asked if there have been any accidents since the last reported incident, to which Mr. Poon replied, not that he is aware of.

The Director reminded Counsel Tydingco that if the 329 rooms are not completed by August 2018, IPI will be in violation of the CLA. Counsel Tydingco acknowledged that they are fully aware of their obligations, and that IPI is preparing to request for an amendment to the is also why he will be recommending to seek an extension. He reiterated that the most important issue at hand is ensuring that the project is completed in the safest and most efficient manner.

The Director inquired when IPI plans to install the dragon. Mr. Poon replied that all the dragon parts are here, but IPI has opted to hold off the installation due to the Chinese New Year as they plan to use the north courtyard for the celebration. The installation of the dragon was included in the discussions with Pacific Rim, he noted.

Commissioner Manglona asked if Mr. Keith J. Stewart, Project Manager for Pacific Rim and Mr. Zhao Xing, Owner Representative, are already on board. Mr. Poon replied that Mr. Stewart is in fact the owner of Pacific Rim, and that daily meeting with him and his team are being held to discuss the construction program and staffing needs. In addition, Mr. Poon mentioned that Mr. Xing is the Resident Project Director and will be working closely with Mr. Stewart and his team.

Chairman Sablan raised the question about the possible assignment of the completion of the hotel and resort part to another party. He shared that in his review of the contract, Article 7, Assignment, stated that IPI shall have the right to assign the agreement to a third party. Chairman Sablan asked what the specification upon notice to Pacific Rim and if they anticipate assigning this project to another party. Counsel Tydingco stated that an assignment clause is not unusual in these types of contracts and that it is a standard clause. Counsel Ernest agreed that the particular clause is generally within every contract but pointed out that they were some clauses that are generally in contracts, which were not incorporated in the Pacific Rim contract. The Director explained that as a safety mechanism, and in the event of an assignment, the Commission may choose not to license the company assigned if it suspects that a legitimate contract does not exist. Chairman Sablan emphasized that in determining the legitimacy of a contract, the CLA also has to be taken into consideration. Therefore, in his opinion, if something is not authorized by the CLA, then it should not be incorporated in the contract. He found this matter to be very concerning, and asked that the Director to work closely with Mr. Poon to obtain copies of all pertinent insurance information, work progress report which should be provided to the Commission prior to the submission of billings to IPI, and a quarterly cash flow report for construction.

2. IPI Personnel- Training and Recruitment of U.S. Workers & Employee Compensation

Ms. Bertha Leon Guerrero, VP of Human Resources, presented IPI's HR Dashboard for January 2018, referenced as Exhibit 2. She then highlighted the following:

As of January 2018, the total headcount is at 1,565 with the percentage breakdown of 45% US, 55% non-US. The different movements were also included in the dashboard, in addition to the different trainings made available, and the number of employees who participated in each respective training program. IPI also had career talks with the different institutions. The confirmed number of approved H2B visas is 1,542. These H2B workers will be issued employee IDs which will be color-coded according to their employment status. She announced that the workers were sourced from the Philippines and Taiwan, and that some might even be from other countries.

The Annual Workforce Plan was updated to include data up to January 2018. It was also restructured and revisions on the verbiage were done based on the discussions and the concerns brought up by the members working on the plan. HR has forwarded the draft to corporate office for review and approval. A copy will be provided to the Commission and the Department of Labor. Feedback from corporate office should be received in a week's time.

The Director asked if there are any H2B visa holders that are not in construction. Ms. Leon Guerrero said that she is not aware of any, and that it is her understanding that all workers holding H2B visas are specifically for construction. Commissioner Santos asked if any of the H2B visa application were denied, and how many petitions in total were submitted by IPI. Ms. Leon Guerrero replied that she did not have the requested information readily available.

In regards to the HR Dashboard, Vice Chairman Reyes asked Ms. Leon Guerrero to elaborate further on the different types of separation. Ms. Leon Guerrero explained that separations consist of terminations and voluntary resignation. Vice Chairman Reyes then inquired on the frequency of separations, and the reasons. Ms. Leon Guerrero replied that turnovers are frequent and are very high in numbers especially in security. This is due to the different shifts which some employees find very difficult to cope with. In terms of reasons for termination, the most common cause is attendance. Others just separate from the company to pursue better opportunities. Vice Chairman Reyes questioned if majority of the separations are locals. Ms. Leon Guerrero said that the higher number is with US Citizens inclusive of locals. She explained that the "Others" category reflects changes made to employees' information such as change of address, movements from one position to another with no material change in responsibilities or salary, title change or the position was renamed. None of the others category was a result of a position being abolished.

Vice Chairman Reyes inquired if any individuals have separated due to the results of drug testing. Ms. Leon Guerrero stated that there were some affected by that but that a positive drug test results is not automatic termination for an employee. In most cases, the employee will be put on leave and will be given the opportunity to undergo a rehabilitation program. Upon completion of the program, the employee will re-instated. However, some employees just chose to voluntarily resign. An employee who does not complete the required program will be terminated, Ms. Leon Guerrero explained.

The Director reminded Ms. Leon Guerrero that in cases like this, reinstatement of an employee after the completion of a drug program, does not automatically entitle them to the reissuance of a CCC license. This issue is something that the Commission looks at very tightly, and a CCC license will not be issued to someone found unsuitable for the industry. If an employee is unlicensed, he/she are prohibited from employment in any licensed position at IPI. The Director also asked if data on suspension can be included in IPI's monthly dashboard under Employee Movement.

Ms. Leon Guerrero expressed that in the last meeting, there were some discussions on IPI's collaboration efforts with NMC on a Casino Management Program. The details of those discussions have not been finalized. However, she acknowledged the need to obtain the Commission's approval on the program's curriculum prior to its implementation. This program, when available, will be one of the ways for growth with the company, and will be a solid foundation for employee promotions. Once discussions are finalized and a proposal is drafted, a copy will be forwarded to the Commission. The Director suggested that this training opportunity be afforded to residents of our neighboring islands of Tinian and Rota.

Commissioner on the dashboard under certain training categories and the number of attendees listed. In response to Commissioner Manglona's inquiries, Ms. Leon Guerrero explained that the number of employees listed under training are inclusive of current employees. For the month of January 2018, 21 new employees underwent the Employee Handbook Orientation. The remaining 174 are current IPI employees who availed of the training as a refresher due to changes in the handbook. With regards to the Title 31/AML training, Ms. Leon Guerrero explained that 133 employees who completed the training are a combination of new and current employees. IPI employees are required to recertify on an annual basis, so the 133 is inclusive of the need to recertify. Ms. Leon Guerrero mentioned that the number of attendees for this particular training will be higher in February 2018 as many employees have to be recertified in

that month.

3. Responsible Gaming Program

Esther Milne, IPI Compliance Division, reported that during the last meeting, there was discussion on the National Council on Problem Gambling (NCPG). She informed the Commission that she is still awaiting confirmation from Mr. Keith Whyte, Executive Director, for his tentative visit to Saipan in April 2018. She explained that originally Mr. Whyte was scheduled to arrive in March but because IPI requested a minimum 3-day visit, the date had to be moved to April. The proposed agenda for the three-day visit will include a site visit to the casino, to meet with the Commission, and to meet with the House and Senate Committees on Gaming. There are also plans for Mr. Whyte to conduct a mini-workshop where he would do a presentation on statistics and allow for Q&A afterwards. IPI anticipates receiving the final details of his visit by the end of February 2018.

Ms. Milne reported that the digital signage on the casino floor are fully operational, and that there are four mobile monitors stationed at the main areas of the casino such as the main lobby, next to the players' club counter, the back side, and the side of the casino floor as you enter the main lobby.

In regards to the compliance link on the slot machines, she explained that the IT department, with the help of IGT, are still working on getting that feature up and going. The same is being discussed with the table games department to determine if the signage can be visible on the monitors. The alternate solution would be to have placards. Fliers are made available at the player's club counter for those individuals who would like information on problem gaming.

Vice Chairman Reyes inquired if the licensee has an estimated number of the locals that visit the casino and play at the table games. Ms. Milne reported that based on the statistics of the Know Your Customer (KYC) data, most of the patrons are non-locals who are mostly tourists from China and Korea. Vice Chairman Reyes then asked if the fliers are only in English. Ms. Milne replied that for now, they are, but they are presently in the process of getting it translated done. She further pointed out that IPI is a member of the NCPG which is a US program based program, therefore, the information they have available is related to what's available in the US. IPI does not have information on problem gambling programs in Korea, China, Japan or other Asian jurisdictions. Vice Chairman Reyes shared his concern that should a non-local patron need assistance in this aspect, it will be a problem if the information is only available in English. He stated that he wants for the problem gambling program to be effective, and in order to ensure that all aspects are covered, the program needs to take into consideration the needs of patrons who are non-English speakers.

Ms. Milne explained that the regulations require IPI to have a self-exclusion program in place but there are really no gambling addiction programs available on island. The only thing the licensee can do is provide referrals to these individuals, but they won't be able to seek the help in the CNMI. She noted that even the 1-800 number for the problem gambling hotline is out of the US and no help from that end can be extended to the CNMI. Vice Chairman Reyes asked if any locals thus far, have been identified as having a gambling problem in the casino. Mr. Milne replied that based on the self-exclusion data, there aren't that many local names.

Vice Chairman Reyes commented that he finds it unfair for the licensee to undertake the entire problem gambling issue when the problem lies mostly in poker and e-gaming addiction. He stated that he is aware that locals are not the usual customers of the casino, because they are

predominantly found in the poker parlors and e-gaming facilities. He suggested taking this mission up to the legislature to seek their assistance in creating a local program. Ms. Milne announced that they plan to have a small workshop for CCC and IPI personnel when Mr. Whyte arrives. She further added that may be the opportune time to invite other e-gaming companies to join. Vice Chairman Reyes recommended inviting the Chairman of the House and Senate Gaming Committees to attend as well.

Commissioner Manglona shared that he believes the program should focus on the needs of locals and not tourists. The Director reiterated Commissioner Manglona's comments and agreed that the casino needs to make money so it's important that tourists who visit the facility spend money.

Vice Chairman Reyes made a motion to recess until 2:00 pm, seconded by Commissioner Manglona. The motion was put to a vote and unanimously approved. Recess at 12:09 pm.

Chairman Sablan called the meeting back to order at 2:05 pm on Thursday, February 22, 2018 at the Joeten-Kiyu Public Library (Technology Room). All Commissioners were present.

4. Compliance Committee

Mr. Rudolfo Urbano, Senior Compliance Manager, reported the following:

IPI is moving into the Phase II of the Actimize "Know Your Process Software" software. Phase II will allow the integration of Actimize with World Check, the OFAC, and List Check. The integration will mean that the system will automatically run background checks on patrons whose names are inputted in Actimize data base through the list of service providers. If a positive hit is returned, the system will automatically send an alert. The existing process is that individual patron's name is inputted manually through World Check and OFAC. The anticipated date of completion for Phase II of the Actimize software is the end of March 2018.

The mapping project between Minimum Internal Control Standards (MICS) and the departmental Standard of Operating Procedures (SOP) is ongoing. A comparison is being done between the MICS and the SOP to ensure that the SOPs are in compliance with the MICS. The internal audits of each department is also ongoing, and the internal audit team is working closely with the different departments to check if they are in compliance with MICS and the casino regulations.

IPI recognizes the importance of self-reporting, especially when it relates to violations. Employees are encouraged to report to compliance division any violations that they see regardless of the position the employee holds. The dissemination of self-reporting forms began on February 19, 2018. The forms were sent to the department heads along with the instructions on how the form can be submitted. The department heads have the responsibility to ensure that the forms are made available to their staff.

Vice Chairman Reyes asked if there is an SOP in place to address the reporting of violations. Ms. Milne said that a process there is a process based on the mandates of the regulations. This is also in conjunction with the whistleblower program that is already in place. It is an added component to encourage employees to come forward to report any violations they feel is occurring or has occurred. She pointed out that there are three methods of reporting a violation which are through the whistleblower hotline, by email, or by submitting a self-reporting form in the designated drop box on the 3rd floor outside of the compliance records and admin office. Vice Chairman asked if all employees that have the need to know are familiar with the

regulations and MICS. Ms. Milne shared that the whistleblower policy is in the employee handbook, and a copy of the handbook is in the possession of the Commission.

Chairman Sablan asked if a copy of the Tip Policy was submitted to the Commission since it was last discussed in the January 2018 meeting. Ms. Milne replied that the September 2017 version of the Tip Policy was sent out to all employees, however, there are some items that still need to be addressed. Compliance is working with finance in identifying those sections, especially in regards to tip reporting. Chairman Sablan asked that an updated Tip Policy be provided to the Commission as soon as possible.

Chairman Sablan expressed his concern that the Compliance Committee continues to disregard the Commission's request to include any and all violations in their compliance committee minutes or reports. If he can recall correctly, he said that this is the second time he's brought this request up to IPI. He pointed out that the only violation noted thus far is the marked playing cards, but he is aware of others.

Chairman Sablan reminded CCC Enforcement Agents, based on what he read on IPI's compliance committee meeting minutes, to ensure that timely responses are provided to IPI when there's a notification of foreign marked cards, and that everything is reported in writing and returned back to the licensee. The minutes also indicated that in some cases, the Commission confiscated the card without a formal letter, and IPI was unable to return the card to the manufacturer.

Mr. Edward Cabrera, Manager of the Commission's Enforcement & Investigations Division, informed Chairman Sablan that some of the cards are actually damaged cards, and that it is incumbent of CCC to keep them for record purposes. He said there were cases when the cards were sent back to the manufacturer, and the Commission just kept a catalog. Chief Cabrera commented that he does not see the need of a formal letter because defective cards are obtained through a receipt which he felt was documentation enough.

Ms. Milne explained that when there's an incident of foreign marked cards, the Commission is immediately informed, in addition to a written notification. She noted that the issue on hand is that the notification letters to the Commission is also a request for approval for IPI to work with the manufacturer in addressing the issue. But before the manufacturer can act, IPI needs the defective cards back from the CCC to send to the manufacturer. IPI also has an issue with CCC retrieving the cards before they have had the chance to do their investigations. IPI has since sent three letters but have only received two acknowledgment letters thus far. Chief Cabrera assured that the third acknowledgment was forthcoming.

Mr. Urbano continued his report by informing the Commission that after training is conducted, a test is given before a certification is issued. Those test booklets were translated to Chinese and Tagalog. IPI is looking into doing future translations into other languages such as Korean, Chamorro or Carolinian, if there are any requests. Vice Chairman Reyes noted that the official languages of the CNMI are English, Chamorro and Carolinian.

Commissioner Manglona requested for clarification on the compliance report in regards to SARs. He questioned the meaning of "SAR as not Suspicious". Mr. Urbano explained that there are two kinds of SAR that are being submitted. The first is the system-generated SAR and second is the SARs that are submitted by employees. All employees are encouraged to submit any suspicious activities that they see regardless of amount. After the SARs are received, they are

analyzed, checked against surveillance records, the player ratings are studied as well as the document history. If it is determined that the transaction is not suspicious, it is brought to the SAR committee, or the vice president and they will conclude if its suspicious or not. Commissioner Maglona asked if the three people that were found adverse were banned from coming back to the casino. Mr. Urbano informed him that the individual Sen Sun was banned for one year, while he is unsure about Ngarijan Salim and Mei Hong Xu Mei. The Chairman asked if any of these three individuals were provided credit. Mr. Chen is not aware and offered to verify their records and let the Commission know.

The Director asked if the compliance committee looks at other issues, such as construction matters. He explained that the concern in the matter is to ensure IPI's compliance with the law, the regulations, the MICS, in light all of the previous problems that were primarily focused on construction-related violations. He suggested the committee spend some time looking at those areas to make sure they are in compliance. Mr. Urbano acknowledged and took note of the Director's recommendation. Commissioner Manglona asked if Mr. Poon was included as a member of the compliance committee as recommended by Chairman Sablan in the last Commission meeting.

Counsel Phil Tydingco says that the compliance committee is strictly focused on gaming, and all gaming-related activities. The Director explained that the problem with that is that IPI, as a whole, has many areas in which they need to comply with such as the CLA, MICS, regulations and laws.

Mr. Andrew Yeom, Manager of the Commission's Compliance Division, inquired on the timeline of the Actimize software and all relative training. Ms. Milne informed the Commission that IPI is looking at the end of March, as a representative is expected to arrive on Saipan on February 23, 2018 along with the specialist who is going to provide training. The visit is to also determine all areas that need to be fine-tuned and to address IPI's issues or concerns with the program.

Mr. Yeom stated that he is unaware of the planned visit by the Actemize team and reminded IPI to ensure that they obtain badges from CCC prior to conducting work in the casino. Mr. Yeom also recommended the implementation of a system that would allow for a centralized data base for all AML information with the Hong Kong and Macau counterparts, more specifically on KYCs. Mr. Yeom also announced that the Commission has not been provided with KYC forms for over six months, and that there hasn't been any feedback on the E & Y report. Mr. Chen noted that he will follow-up and report a feedback to the commission.

The Chairman asked about the whereabouts of Mr. Eugenio Sousa, Mr. Chen informed him that Mr. Sousa resigned. Chairman asked the Director if he received notice of Mr. Sousa's resignation to which he replied that it was not an official notice but he was aware. Ms. Milne noted that Mr. Sousa's separation is an HR matter and the HR policy dictates that they are not allowed to discuss an employee's status.

The Director explained that in the case of a key position, such as Mr. Sousa's, and it is critical for the Commission to be notified the very moment the resignation is accepted by IPI. He further added that because of the licensing process, key employees must go through an exit interview with the Commission. Mr. Chen advised that he will follow-up with HR, and the Chairman reminded him that the official notification to the Commission should be in writing. The Director asked if anyone is aware of who his replacement will be. He shared that he was verbally informed that Mr. Derek Hocog will assume the position, although the Commission has not

received a formal notification. In the interim, the Director asked that the Commission be notified of the name of the person the Commission should approach on matters of security. Counsel Tydingco announced that he received information that it was indeed Mr. Derek Hocog who will be in charge of security.

5. Other Miscellaneous Matters- None

B. Other Matters:

The Chairman recommended that if any message is released to the media/public on the Community Contribution Fund, it is important to recognize that this contribution is a result of the Casino License Agreement. Counsel Tydingco stated that on the official transmittal letters to the Governor, there is mention of the mandates of the CLA as it is restated in the letter as well as the regulations.

V. OLD BUSINESS

A. Proposed Permanent Adoption of Casino Regulations

1. §175-10.1-1501: Commencement of Complaint.
2. §175-10.1-1510 (a)(b)(d): Notice of Defense.
3. §175-10.1-1805(b)(14-17): Grounds for Disciplinary Action.
4. §175-10.1-2535(c): Determination of Offense Level.
5. §175-10.1-2555: No Hearing Necessary for Determinations.

Vice Chairman Reyes moved for the permanent adoption of casino regulations 1, 2, 3 and 5, and the deletion of number 4. The motion was seconded by Commissioner Manglona, was put to a vote and unanimously approved.

Counsel Ernest stated he and IPI's Counsel did meet to discuss the regulations, and that some of their concerns were taken into consideration. He noted that Counsel Tydingco, on behalf of IPI, did try to work with the Commission on this. Mr. Tydingco stated for the record that the IPI's concerns mentioned were put into writing, and although not all changes requested were agreed upon, made or not, IPI reserves the right based on their objections to raise those issues if these are relied upon or utilized against IPI based on the recent objections that were submitted.

VI. NEW BUSINESS:

- A. **Minimum Bankroll Requirements:** IPI's letter, dated February 12, 2018, regarding extension or adoption of a minimum bankroll proposal.

Commissioner Manglona moved to extend the waiver of the Minimum Bankroll Requirements as set forth in Section 175-10.1-560 of the CNMI Casino Regulations with the following terms and conditions:

1. Imperial Pacific International (CNMI), LLC ("IPI") shall maintain sufficient cash on hand to cover its daily gaming operations; provided that IPI maintains no less than Four Million Dollars (US\$4,000,000); and,
2. IPI's parent company shall guarantee the payment of all its gambling debts in the

CNMI without reservation or limitations.

The extension of the waiver of the Minimum Bankroll Requirements, as noted herein shall be valid for a period of six months from February 28, 2018 (or no later than August 31, 2018).

The motion was seconded by Commissioner San Nicolas, and was put to a vote, and unanimously approved.

B. Notification of Provisional Service Provider License:
1. Mega Fortris (Malaysia) SDN BHD.

C. Notification of Provisional Casino Vendor License:
1. Macau Bidanli Lighting Company, Ltd.
2. Rockey Company Limited

D. CCC Fiscal Year 2019 Budget Request

The Director reported the following: As mentioned in the last meeting, there was a budget call from Management & Budget with a February 23, 2018 deadline for all government agencies to submit their FY2019 budget requests. He is presenting the same information as stated in his Executive Report. He adds that after the budget request is submitted, there is usually a budget hearing to follow. However, since the funds provided by the government are minimal, there was never a need to have a budget hearing for the Commission.

Vice Chairman Reyes asked if there are annual performance reviews in place for employees. The Director said that there are none, although if the passage of HB 20-82 is successful, the Commission will have to adopt its own handbook and personnel policies and employee performance ratings can be recommended at that time. Vice Chairman favored the idea of providing incentives to the employees but the Director expressed that doing so will require additional funding. The Commission will have to find alternate funding sources if there are plans to increase salaries. The Director mentioned that he has included 5 unfunded FTEs in the FY 2019 Budget Request.

Upon review of the Budget Request, Vice Chairman Reyes mentioned that he does not see any mention of Workers Compensation, which is mandated by PL 6-33. The Director noted Vice Chairman Reyes's concern which was concurred by the Commissioners. He offered to move numbers around to allow for at least \$30,000 for Workers Compensation.

Vice Chairman Reyes made a motion to adopt the budget as amended with the inclusion of funding for worker's compensation. The motion was seconded by Commissioner Manglona. It was put to a vote and unanimously approved.

VII. EXECUTIVE SESSION:


Commissioner Manglona moved to enter into executive session to discuss the items listed below. The motion was seconded by Commissioner San Nicolas and was put to a roll call vote with all voting yes. Executive session began at 3:20 pm.

- A. Report by the Legal Counsel
- B. Report by the CCC Audit Division
- C. IPI Financial Matters

Commissioner Manglona made a motion to exit executive session at 5:17 pm on Thursday, February 22, 2018. The motion was seconded by Commissioner San Nicolas and was put to a vote and unanimously approved.

VIII. ADJOURNMENT

Commissioner Santos moved to adjourn the meeting, seconded by Commissioner Manglona. The motion was put to a vote and unanimously approved. The meeting was adjourned at 5:20 pm on Thursday, February 22, 2018.


Prepared by:  Date: 3/8/18
Elicia San Nicolas
Executive Secretary

And

 Date: 3/8/18
Ruth Ann P. Sakisat
Executive Assistant to the Commission

Concurred by:  Date: 3/8/18
Justin S. Manglona
Commission Secretary

APPROVED AND ADOPTED ON: 14th day of March, 2018.

 Date: 3/14/18
Justin S. Manglona
Commission Secretary

**IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)**

REPORT ON PROJECT PROGRESS AS OF 20-Feb-2018		Date: 20-Feb-2018
REPORT NO: 018		
KEY MILESTONES DATES	Planned	Forecast / Actual
Pile Cap commence	15-Dec-2015	22-Dec-2015(A)
Podium Steelwork commence	29-Feb-2016	27-Feb-2016(A)
Podium MEP commence	01-May-2016	10-Jun-2016(A)
Casino Fit out commence	01-Jun-2016	02-Jul-2016(A)
Podium Topping Out	30-Jun-2016	30-Jul-2016(A)
Tower Topping Out	13-Aug-2016	26-Jun-2017(A)
Power On	30-Aug-2016	06-Jan-2017(A)
Podium A/C On	11-Oct-2016	15-Apr-2017(A)
FSD Inspection for Podium	30-Nov-2016	20-Feb-2017 to 30-Mar-2017(A)
DPW Inspection for Podium	07-Dec-2016	30-Mar-2017 to 5-May-2017(A)
Opening of Casino	21-Dec-2016	6-Jul-2017 (A)
FSD Inspection for Hotel Tower / Resort Hotel	10-Mar-2017	15-Jun-2018 to 15-Jul-2018 (F)
DPW Inspection for Hotel Tower / Resort Hotel	17-Mar-2017	15-Jul-2018 to 15-Aug-2018(F)
Opening of Resort Hotel / Hotel Tower	31-Mar-2017	15-Aug-2018(F)

IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)

KEY ISSUES

1. Formal main contract signed with Pacific Rim on 13-Feb-2018.
2. 1044 H2B visa quota was approved. The first batch of arrival will be around mid-March 2018.

1542 H2B VISAS APPROVED

LABOUR SUMMARY

Contractors Resources

- Management Staff: 38

216 in February

- Workers: Total 190

- MEP: 40 (GPPC / Winzy / Fujitec / DC)
- Structural Steel / Facade: 48 (Sinopan)
- Fitting-out / Builderwork: 54 (Pacific Rim)
- Façade: 25 (Dragon Cheng)
- General Labours: 23 (AM)

STATUTORY ISSUES

1. The inspection report from DFEMS for Phase 1 alarm system is still pending.

IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)

A. Imperial Pacific Resort

PROGRESS / STATUS			% Completion	
			Previous %	Current %
OVERALL COMPLETION PERCENTAGE			64%	64.5%
1.	PILING WORKS	- All piling works completed	100%	100%
2.	STRUCTURAL STEEL	- The steel work below L3 (for low rise) was completed	100%	100%
		- The steel erection was up to roof for the Hotel Tower. Steel erection for the Tower Dome was completed	100%	100%
		- The Steel erection for Resort Hotel North Wing was completed	100%	100%
3.	REINFORCED CONCRETE	- Resort Hotel RC works was completed for the Manor House	100%	100%
		- Resort Hotel RC works for North Wing	100%	100%
		- North Forecourt Fountain	80%	100%

IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)

4.	MEP WORKS (Low Rise)	<ul style="list-style-type: none"> - Installation works for ductworks / trunking / piping from basement up to L2Z - Installation work inside Cantonese and ADD Restaurant in progress 	92%	92%
5.	(Resort Hotel – Manor House)	<ul style="list-style-type: none"> - Installation works for conduit / trunking / piping from L1 to L4 in progress 	65%	70%
6.	MEP WORKS (High Rise)	<ul style="list-style-type: none"> - Installation works for conduit / trunking / piping from L3 to L5 (Manor House) in progress 	15%	15%
7.	FITTING-OUT (Low Rise)	<ul style="list-style-type: none"> - Interior fit-out for Grand Lobby and Main Casino - Interior fit-out (Cantonese restaurant) in progress - BOH interior fit-out works 	100%	100%
8.	FITTING-OUT (Resort Hotel – Manor House)	<ul style="list-style-type: none"> - Interior fit-out in progress 	30%	35%
9.	FITTING-OUT (High Rise)	<ul style="list-style-type: none"> - Interior Fit-out in progress for L3 to L9 	9%	9%
10.	FAÇADE (Low Rise)	<ul style="list-style-type: none"> - Podium GRC and marble installation in progress 	100%	100%

IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)

11.	FAÇADE (Resort Hotel - East Wing)	- Resort GRC and marble installation (Manor House) in progress	95%	95%
12.	FAÇADE (Resort Hotel - North Wing)	- Resort GRC and marble installation (Manor House) in progress	10%	15%
13.	Façade (High Rise)	- GRC installation	22%	24%

B. Off-Site Improvement Work

OVERALL COMPLETION PERCENTAGE:			% Completion	
PROGRESS / STATUS			Previous %	Current %
1.	Sewage Connection	- The new S4 station completed	100%	100%
		- Pipe laying was completed (Phase 1)		
		- Pipe laying in progress (Phase 2)	80%	80%
2.	Road Works and Water Quality Improvement (Derence Jack Road)	- Canal installation	100%	100%
		- Road resurfacing	100%	100%

IMPERIAL PACIFIC RESORT
PROGRESS REPORT (Up to 20 Feb 2018)

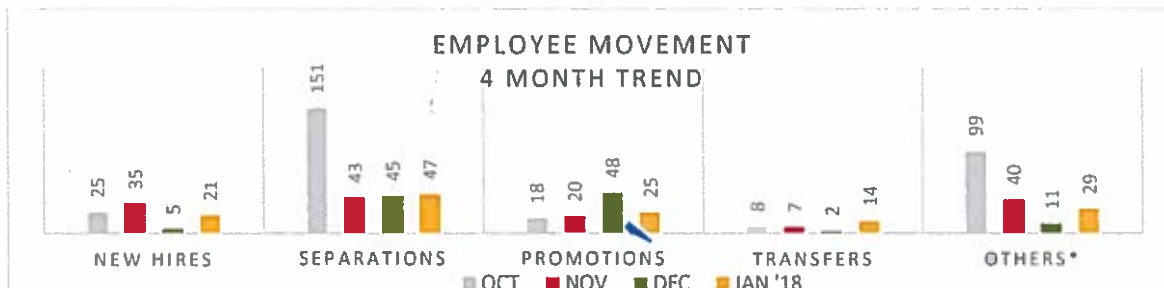
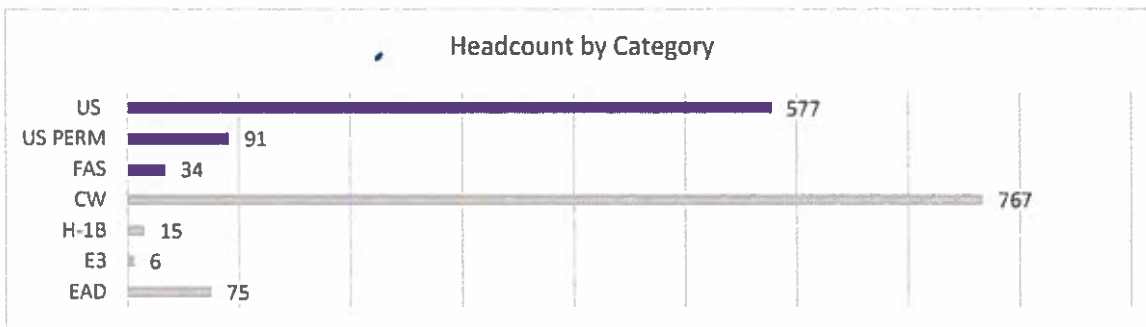
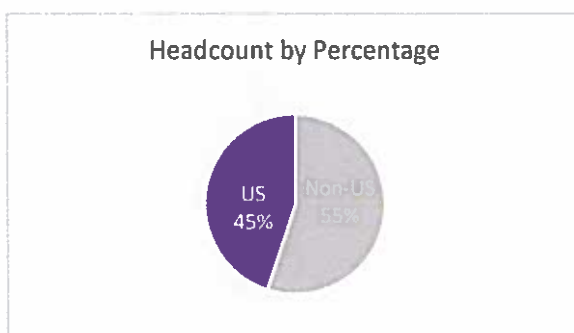
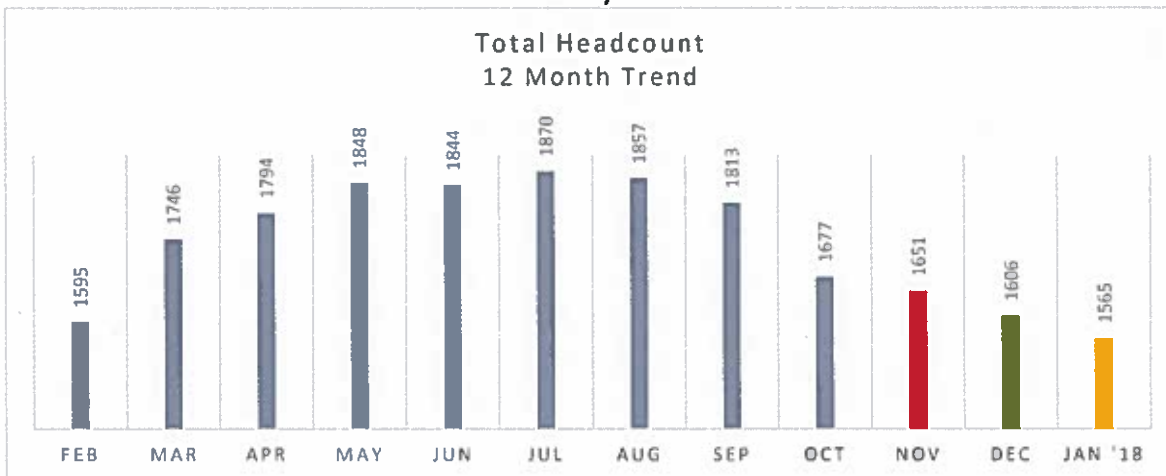
C. SITE PROGRESS PHOTOS

Overall



HR Dashboard

January 2018



- Must include suspensions in dashboard

LEARNING & DEVELOPMENT

A summary of the trainings, workshops and courses completed by IPI employees are provided below:

Training / Workshop / Course	# of Participants			
	NOV	DEC	JAN '18	FEB
Alcohol Beverage Tobacco Control	0	0	2	20
American Red Cross, First Aid, CPR & AED	0	15	14	8
Aspiring Leadership Program - Module 1	0	8	0	12
Aspiring Leadership Program - Module 2	0	6	0	
Aspiring Leadership Program - Module 3	10	0	9	
Aspiring Leadership Program - Module 4	6	0	5	
Aspiring Leadership Program - Module 5	0	6	8	
Basic Courtesy Mandarin for Beginners	44	0	0	
Butler Services Training by Magnums	0	0	0	
Butler Services Training (TTT) by Magnums	0	0	0	8
Confidentiality & Non-disclosure Training	32	33	9	
Cultural Diversity in the Workplace	0	0	0	
Cultural Diversity in the Workplace: Managing Conflict	0	0	0	
Culture of Safety	0	0	0	
Customer Care Program - 4 Key Drivers	0	0	0	
Customer Service Training for Butlers from VIP Marketing	0	0	0	
EEOC for General Staff	13	0	12	
EEOC for Supervisors & Above	66	70	10	
Effective Behavior-based Interviewing Skills	0	0	0	
Effective Performance Appraisal Interview Workshop	0	0	0	30
Employee Handbook Orientation	131	20	198	
Fire Safety Training	0	0	0	
Food & Beverage Training for Butlers from VIP Marketing	0	0	0	
Image Building & Personal Branding	0	0	0	
Job-specific Mandarin for Dealer	136	136	0	
Limousine Service Training - VIP Transportation	0	0	0	
Opera Training	0	0	0	
Orientation (IFC/OTB)	0	0	5	
Orientation & Guest Services	33	5	20	
OSHA Records Keeping Training	0	0	0	7
Polishing Your Presentation Skills	0	0	0	
Red Rock - Chef/F&B/Recipe	0	0	0	
Red Rock - Intensive	0	0	0	
Red Rock - Inventory	0	0	0	
Red Rock - Invoicing	0	0	0	
Red Rock - Normal End User	0	0	0	
Red Rock - Purchasing	0	0	0	
Red Rock - Receiving	0	0	0	

Serve Safe Training & Examination	0	0	0	
Title 31 / AML^	103	8	133	5
Together We Care - Module 1	0	1	0	
Together We Care - Module 2	0	0	0	
Together We Care - Module 3	0	0	0	
Together We Care - Module 4	0	0	0	
Trainer's Club Meeting with training updates	0	0	20	
Train the Trainer	0	0	0	35
Work Smart with Excel^^	0	0	34	9
Working in Teams	8	6	0	

*As of February 13, 2018

Compliance Training

The Compliance Department is responsible to deliver the training, performing the assessment, and maintaining attendance records and issuance of training certificates. It is mandatory that all new employees attend this training, as well as current employees are required to attend a refresher course every year.

Work Skills Training

The Learning & Development team continues to work closely with Northern Marianas College (NMC) to offer Work Skills training for career advancement opportunities to our employees. Intermediate level classes are organized for February 16, 2018 and February 23, 2018 with 35 enrollees.

Career Talk at Northern Marianas Trades Institute

The two interns from NMTI have started their 240-hours internship, one in the Housekeeping Department and the other in the Food & Beverage Department. The projected completion date for the internship is mid-March 2018.

Career Talk at Northern Marianas College

Three (3) students had expressed interest, and were confirmed to undergo their internship with IPI. This 240-hour internship program is anticipated to commence late this month or next month.