

**Gaming Commission Regulations**  
Regulation # R400-04:GC-11

**Chapter 11 – Class III Tribal Minimum Internal Control Standards**

**Table of Contents**

1. [Purpose and Authority](#)
2. [Definitions](#)
3. [Tier C Gaming Compliance](#)
4. [Minimum Internal Control Standards and Tribal-State Compact](#)
5. [Table Games](#)
6. [Gaming Devices](#)
7. [Cage, Vault, Kiosk, Cash, and Cash Equivalents](#)
8. [Information Technology](#)
9. [Controlled Keys](#)
10. [Drop and Count](#)
11. [Patron Tracking System](#)
12. [Complimentary Services or Items](#)
13. [Cashless Wagering Systems and Patron Accounts](#)
14. [Gaming Promotions, Promotional Drawings, Tournaments, Coupons, and Direct Mailings for Non-Integrated Systems](#)
15. [Marketing, Gaming Promotions, Promotional Drawings for Integrated Cashless Wagering Systems](#)
16. [Accounting and Internal Audit](#)
17. [Lines of Credit](#)
18. [Auditing Revenue](#)
19. [BSA/AML and Currency Transaction Reporting](#)
20. [Surveillance](#)
21. [Retail Sports Betting](#)

**Section 1. Purpose; Authority**

Chapter 11: Class III Tribal Minimum Internal Control Standards  
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- 1.1. *Purpose.* It is the purpose of this chapter to provide minimum internal control standards to effect proper regulation of the gaming operation(s) of the Little River Band of Ottawa Indians.
- 1.2. *Authority.* These Tribal Minimum Internal Control Standards (TMICS) are issued under and pursuant to the authority of the Gaming Ordinance #10-400-01, Gaming Commission Ordinance #04-400-04, Commission's Ordinance #04-150-01, [Indian Gaming Regulatory Act \(IGRA\)](#), and the Tribal-State Compact.

## Section 2. Definitions

- 2-1. *General.* For purposes of this regulation, certain terms are defined in this section. The word **shall** be always mandatory and not merely advisory. Unless defined elsewhere, terms defined in this regulation, the Gaming Ordinance and the Gaming Commission Ordinance are defined for the purpose of all Gaming Commission regulations.
- 2-2. *Account Access Card* means an instrument used to access patron accounts for wagering at a gaming device. Account access cards are used in connection with a computerized account database.
- 2-3. *Accountability* means all items of cash, cash equivalents, cheques, coins, and receivables constituting the total amount for which the Accounting Department is responsible at any given time.
- 2-4. *Accounting System* means a system utilized by a gaming operation that securely maintains and monitors data which may include but is not limited to patron tracking, gaming device activity and marketing functionality, inclusive of other activities that interface with the system. In addition, the casino accounting system may provide the gaming operation with the ability to perform cashless transactions and monitor, detect, report and log system exceptions.
- 2-5. *Accumulated credit payout* means credit earned in a gaming device that is paid to a patron manually in lieu of a machine payout (i.e., hand pay, manual pay).
- 2-6. *Actual hold percentage* means the percentage calculated by dividing the win by the drop or coin-in (number of credits wagered) which can be calculated for individual tables or gaming devices, type of table games, or gaming devices on a per day or cumulative basis.
- 2-7. *Athletic Event* means a sports activity that involves the athletic skill of one (1) or more patrons or participants. Athletic events do not include:
  - a. Horse racing if the retail sports betting on that race is pari-mutual
  - b. Any sport or athletic event played by individuals that are at the high school level or below unless most participants in the sport or athletic event are eighteen (18) years of age or older

- c. Roulette, poker, blackjack, a card game, a dice game, or any other game or contest typically offered in a casino other than retail sports betting
  - d. A fantasy contest
- 2-8. *Automated payout means* payment issued by a gaming device.
- 2-9. *Bank or Bankroll* means the inventory of cash, coins, cheques, receivables and patron deposits in any cage, pit area, financial instrument storage compartment and on the playing tables and cash in bank which is used to make change, pay winning bets and gaming device jackpots.
- 2-10. *Bill/Ticket acceptor* means the device that accepts and reads cash and cash-out tickets by denomination to accurately register patron credits.
- 2-11. *Bill/Ticket acceptor canister* means the box attached to the bill/ticket acceptor used to contain cash or cash-out tickets received by bill/ticket acceptors.
- 2-12. *Bill/Ticket acceptor canister cart key* means the key used to access the storage rack where bill/ticket acceptor canisters are secured.
- 2-13. *Bill/ticket acceptor contents keys* mean the keys used to open bill/ticket boxes.
- 2-14. *Bill/Ticket acceptor canister release key* means the key used to release the bill/ticket acceptor canister from the bill/ticket acceptor device.
- 2-15. *Bill/Ticket acceptor drop* means cash contained in bill/ticket acceptor canisters.
- 2-16. *Bill-in meter* means a meter included on a gaming device accepting cash that tracks the number of bills put in the machine.
- 2-17. *Box-person* means the first-level supervisor who is responsible for directly participating in and supervising the operation and conduct of a craps game.
- 2-18. *Business year* means the annual accounting period, such as a calendar or fiscal year, by which the gaming operation maintains its books and records.
- 2-19. *Cage* means a secure work area within the gaming facility for cashiers which may include a storage area for the gaming operation bankroll.
- 2-20. *Cage accountability* means all the cash and cash equivalents in the possession of the cage as summarized daily on a cage accountability form that includes, but is not limited to, items such as currency, coin, markers, and cheques.
- 2-21. *Cage accountability form* means an itemized list of the cash and cash equivalents that make up the cage accountability.

- 2-22. *Call bets* mean a wager made without cash or cheques, reserved for a known patron and includes marked bets (which are supplemental bets made during a hand of play). For settling a call bet, a hand of play in craps is defined as a natural winner (i.e., seven or eleven on the come-out roll), a natural loser (i.e., a two, three, or twelve on the come-out roll), a seven-out, or the patron making his point, whichever comes first.
- 2-23. *Cashable Electronic Promotion In (CEP In)* means the total value of cashable credits electronically transferred to the gaming device or game from a promotional account by means of an external connection between the gaming device, game and a cashless wagering system.
- 2-24. *Cashable Electronic Promotion Out (CEP Out)* means the total value of cashable credits electronically transferred from a gaming device or game to a promotional account by means of an external connection between the gaming device or game and a cashless wagering system.
- 2-25. *Cash equivalent* means the monetary value that a gaming operation may assign to a document or anything else of representative value other than cash, or cheques. A cash equivalent includes, but is not limited to, coupons, vouchers, wagering or payout slips and tickets, debit and credit card receipts, and other items to which a gaming operation has assigned an exchange value.
- 2-26. *Cashless devices* mean an electronic device which facilitates financial transactions with a patron account and/or cashless transactions between a patron account or electronic payment account and Gaming Equipment maintained by the gaming operation and used in a cashless environment. Any additional device or software which is used to meet a regulatory requirement may also be subject to control based on functionality.
- 2-27. *Cashless transactions* mean the electronic transfer to/from a cashless device of a patron account's funds using a cashless system. The term also includes electronic funds transferred from an electronic payment account to a cashless device.
- 2-28. *Cashless wagering instrument* means a method used within a casino environment that allows patrons to make bets and settle transactions using digital payment methods. This can include mobile apps, cards, data files, or electronic (digital) wallets, instead of using physical cash, or cheques.
- 2-29. *Cashless Wagering System (CWS)* means the hardware, software, firmware, communications technology, other equipment, as well as gaming operations procedures implemented in order to allow patrons to participate in wagering activities using approved authentication methods, which access a patron account at the gaming operations or an electronic payment account of the patron provided that it allows for the identification of the account and the source of funds. The system provides the gaming operations with a means to review patron accounts, generate various cashless/financial transactions and account reports, and set any configurable parameter.

- 2-30. *Cash-out ticket* means an instrument of value generated by a gaming device representing a cash amount owed to a patron at a specific gaming device. This instrument may be wagered at other devices by depositing the cash-out ticket in the gaming device's bill/ticket acceptor.
- 2-31. *Cheques* are cash substitutes, in various denominations, issued by a gaming operation and used for wagering.
- 2-32. *CIS-CSC* means the [Center for Internet Security's Critical Security Controls Version 8.1](#) and its successors.
- 2-33. *Class III gaming* means all forms of gaming that are not Class I and Class II as defined in [25 U.S.C. § 2703 \(8\)](#).
- 2-34. *Collections* means the process of recovering debts owed by patron(s) through an established line of credit.
- 2-35. *Collection agency* means a third-party company hired to collect outstanding debts owed to the gaming operation by patrons through established lines of credit.
- 2-36. *Complimentary services or items* means a service or item provided at no cost, or at a reduced cost to a patron, at the discretion of an employee on behalf of the gaming operation or by a third-party on behalf of the gaming operation.
- 2-37. *Control program* means any software, source language or executable code which affects the result of a wager by determining win or loss. The term includes, but is not limited to, software, source language, or executable code associated with the:
- a. Random number generation process
  - b. Mapping random numbers to game elements to determine game outcome
  - c. Evaluation of the randomly selected game elements to determine win or loss
  - d. Payment of winning wagers
  - e. Game recall
  - f. Game accounting including the reporting of meter and log information to on-line gaming device metering system
  - g. Monetary transactions conducted with associated equipment
  - h. Software verification and authentication functions which are specifically designed and intended for use in a gaming device
  - i. Monitoring and generation of game tilts or error conditions

- j. Game operating systems which are specifically designed and intended for use in a gaming device

***\*The term does not include software used for artistic attributes of a game including graphics, sound, and animation providing entertainment unless such elements are material to game play because they are necessary for the patron to understand the game or game outcome.***

- 2-38. *Count* means the act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, gaming device, patron interface, shift, or other period.
- 2-39. *Count room* means a secure location in which the drop is counted.
- 2-40. *Count Services Team* means employees who perform the drop and the count.
- 2-41. *Counter check* means a form provided by the gaming operation for the patron to use in lieu of a personal check.
- 2-42. *Coupon* means a certificate that can be redeemed for cash, prizes, promotional points, and promotional items.
- 2-43. *Credit* means the right granted by the gaming operation to a patron to defer payment of debt or to incur debt and defer its payment.
- 2-44. *Credit limit* means the maximum dollar amount of credit assigned to a patron by the gaming operation.
- 2-45. *Credit slip* means a form used to record the return of cheques from a table game to the cage.
- 2-46. *Currency* means the coin and paper of the United States or any other country that circulates and is customarily used and accepted as money in the country it is issued. It includes United States silver certificates, United States notes, Federal Reserve notes and official foreign bank notes, but does not include bank checks and notes or other negotiable instruments not customarily accepted as money.
- 2-47. *Currency counter* means a device that identifies currency by means of an optical sensing and correlating technique to both count and differentiate denomination. The counter may perform two (2) counts by independent central processing units prior to transferring the currency into a stacker. It may interface with the accounting systems of the gaming operation and account for cash-out tickets redeemed and promotional coupons cancelled.
- 2-48. *Currency counter interface* means a link between a currency counter and typically the accounting software systems of the gaming operation in which access is restricted to authorized persons.

- 2-49. *Currency Transaction Report (CTR)* is a document that U.S. financial institutions are required to file with FinCEN for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through or to the financial institution that involves a transaction in currency of more than \$10,000.00 in a gaming day.
- 2-50. *Deal* means:
- a. The distribution of playing cards to patrons at a table game
  - b. Roll of the dice at crap.
  - c. Spin of the ball at roulette
- 2-51. *Dealer* means an employee who operates a game, individually or as a part of a crew, administering house rules and making payoffs.
- 2-52. *Dedicated camera* means a video camera that continuously records a specific activity.
- 2-53. *Drawing or promotional drawing* means an event requiring some form of consideration to participate that awards item(s) of value to a patron, the award of which is based on chance, even if accompanied by some skill.
- 2-54. *Drop (for gaming devices)* means the total amount of cash and cash equivalents removed from the bill/ticket acceptor canisters.
- 2-55. *Drop (for table games)* means the total amount of cash, cheques, and coins removed from drop boxes, plus the amount of credit issued at the tables.
- 2-56. *Drop box* means a locked container affixed to a table game into which the cash and/or cash equivalents are placed. The game type, table number, and shift are indicated on the box.
- 2-57. *Drop box contents key* means the key used to open drop boxes.
- 2-58. *Drop box release key* means the key used to release drop boxes from tables.
- 2-59. *Drop box storage cart key* means the key used to access the storage rack where drop boxes are secured.
- 2-60. *Drop period* means the period that occurs between sequential drops.
- 2-61. *Drop proceeds* means the total amount of financial instruments removed from the drop boxes and financial instrument storage components.
- 2-62. *Dual-rate function* means an employee of a lower level within the same department who moves up to temporarily perform the duties of a supervisor.

- 2-63. *Emergency drop* means any drop that takes place outside of the submitted and approved drop schedule, and when count services team members are not available on property.
- 2-64. *Erasable Programmable Read-Only Memory (EPROM)* is a type of non-volatile memory chip that can retain its data even when powered off.
- 2-65. *Established patron* means a person with an account with a financial institution, including a loan account, deposit account, or other asset account, or a person with respect to which a financial institution has obtained and maintained on file the person's name and address, as well as taxpayer ID (i.e., Social Security Number or employee I.D.) or, if none, alien identification number or passport number and country of issuance and to which the financial institution provides financial services relying on that information.
- 2-66. *Exception report* means a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.
- 2-67. *Filing deadline/requirements* means a currency transaction report for each transaction in currency, involving either cash in or cash out, of more than \$10,000.00 which shall be filed with the IRS by the 15th day after the date of the transaction, as required by [Title 31 – Chapter X](#). The gaming operation may report both cash in and cash out transactions by or on behalf of the same patron on a single CTR form.
- 2-68. *Fill* means a transaction whereby a supply of cheques is transferred from a bankroll to a table game.
- 2-69. *Fill slip* means a document evidencing a fill.
- 2-70. *Financial instrument* means any tangible item of value tendered in game play, including, but not limited to bills, coins, cheques, vouchers and coupons.
- 2-71. *Financial instrument storage component* means any component that stores financial instruments, such as a drop box.
- 2-72. *Gaming Commission* means the Little River Band of Ottawa Indians Gaming Commission.
- 2-73. *Gaming day* means the normal business day of a gaming operation. For a gaming operation that offers twenty-four (24) hour gaming, the term means that twenty-four (24) hour period by which the gaming operation keeps its books and records for business, accounting, and tax purposes. For purposes of this regulation, each gaming operation may have only one (1) gaming day.
- 2-74. *Gaming device* means a microprocessor-controlled electronic device which allows a patron to play games of chance, some of which are affected by skill, which is activated by the insertion of a coin, currency, tickets, or credit, and which awards game credits, replays or a receipt that can be redeemed by the patron.

- 2-75. *Gaming device analysis report* means a report prepared that compares theoretical to actual hold by a gaming device on a monthly or other periodic basis.
- 2-76. *Gaming device count* means the total amount of cash and cash equivalents removed from a gaming device. The amount counted is entered on the count sheet and is considered the drop. Also, it refers to the procedure of counting cash and cash equivalents.
- 2-77. *Gaming devices pay table* means the reel strip or virtual reel combinations that identify payouts of designated amounts.
- 2-78. GLI-GSF means Gaming Laboratories Inc. Gaming Security Framework and included modules.
- 2-79. *Gaming operation* means each economic entity that is licensed by a tribe, operates the games, receives the revenues, issues the prizes, and pays the expenses.
- 2-80. *Gaming operation account number* means all numbers by which a gaming operation identifies a patron. (i.e., Patron's Club ID number).
- 2-81. *Generally Accepted Accounting Principles (GAAP)* means a widely accepted set of rules, conventions, standards, and procedures for reporting financial information, as established by the Financial Accounting Standards Board (FASB), including, but not limited to, the standards for casino accounting published by the American Institute of Certified Public Accountants (AICPA).
- 2-82. *Generally Accepted Auditing Standards (GAAS)* means the general guidelines and principles, standards and detailed rules, plus industry practices that exist for financial reporting, as established by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA).
- 2-83. Governmental Accounting Standards Board (GASB) means generally accepted accounting principles used by state and local governments.
- 2-84. *Gross gaming revenue* means the net win from gaming activities conducted by the gaming operation which is the difference between gaming wins and losses before deducting costs and expenses, determined in accordance with GAAP consistently applied.
- 2-85. *Hold* means the relationship of win to coin-in for gaming devices and win to drop for table games.
- 2-86. *Independence* means the separation of functions to ensure that the employees or process monitoring, reviewing, or authorizing the controlled activity, function, or transaction is separate from the employees or process performing the controlled activity, function, or transaction.
- 2-87. *In-house progressive gaming device(s)* means a gaming device on which play on the device affects the progressive amount. As wagers are placed, the progressive meter on the device

- increases. An in-house progressive may be linked to other in-house progressive devices within a single gaming operation.
- 2-88. *Integrity monitoring* means monitoring of sports bets/wagers to identify unusual betting or suspicious sports betting activities from a match-fixing and sporting corruption standpoint to then report such activities to required parties.
- 2-89. *Internal Audit Department* means a department that performs an audit function of a gaming operation that is independent of the department subject to audit. Independence is obtained through the organizational reporting relationship, as the Internal Audit Department shall not report to management of the gaming operation. Internal audit activities shall be conducted in a manner that permits an objective evaluation of areas examined. The Internal Audit Department reports directly to the Executive Director of the Gaming Commission.
- 2-90. *Issue slip* means a copy of a credit instrument that is retained for numerical sequence control purposes.
- 2-91. *Jackpot payout* means a transaction associated with a winning event that causes the gaming device to lock up at a predetermined amount and that is paid by the Slot Operations Department.
- 2-92. *Kiosk* means a self-serve component of a computerized casino accounting system capable of accepting or dispensing cash or cash equivalents and which may also be capable of initiating cashless transactions to or from a promotional account.
- 2-93. *Lammer button* means a type of chip that is placed on a gaming table to indicate that the amount of cheques designated thereon has been given to the patron for a wagering on credit before completion of the credit instrument. Lammer button may also mean a type of chip used to evidence transfers between table banks and card room banks.
- 2-94. *Line(s) of credit* means a privilege granted by the gaming operation to a patron to:
- a. Defer payment of debt; or
  - b. Incur debt and defer its payment under specific terms and conditions.
- 2-95. *Machine-readable* means capable of being read by an automated data processing system.
- 2-96. *Manual payout* means any non-automated payout.
- 2-97. *Marker* is a document signed by the patron promising to repay credit issued by the gaming operation.
- 2-98. *Marker transfer form* means a form used to document transfers of markers from the pit to the cage.

- 2-99. *Master game program number* means the game program number listed on any gaming device control program or EPROM.
- 2-100. *Master game sheet* means a form used to record, by day, each table game's winnings and losses. This form reflects the opening and closing table inventories, the fills and credits, and the drop and win.
- 2-101. *Meter* means an electronic (soft) or mechanical (hard) apparatus in a gaming device. May record the number of coins wagered, the number of coins dropped, the number of times the handle was pulled, or the number of coins paid out to winning patrons.
- 2-102. *Money laundering* means the disguising or concealing of illicit income to make it appear legitimate.
- 2-103. *Motion activated dedicated camera* means a video camera that, upon its detection of activity or motion in a specific area, begins to record the activity or area.
- 2-104. *Multi-denomination device* means a gaming device that allows a patron to wager various denominations on the same game.
- 2-105. *Multi-game device* means a gaming device that includes more than one type of game.
- 2-106. *Multiple Transaction Logs (MTL)* means single and/or multiple transactions totaling more than \$10,000.00 during a gaming day. All cash-in or all cash-out transactions shall be aggregated on a multiple transaction log to determine if the \$10,000.00 threshold has been attained. Cash-in transactions are to be aggregated only with other cash-in transactions unless it is a cash exchange transaction. To achieve this, all cash-in and cash-out transactions greater than \$2,500.00 shall be logged and tracked onto a Multiple Transaction Log (MTL).
- 2-107. *Negotiable Instruments (for purposes of the Currency Transaction Report)* means all checks (including personal, business, bank, cashier's and third-party checks), money orders and traveler's checks.
- 2-108. *Network communications equipment* means a device or collection of devices that controls data communication in a system including, but not limited to, cables, switches, hubs, routers, wireless access points, landline telephones and cellular telephones.
- 2-109. *Non-Cashable Electronic Promotion In (NCEP In)* means the total value of non-cashable credits electronically transferred to the gaming device or game from a promotional account by means of an external connection between the gaming device, or game and a cashless wagering system.
- 2-110. *Non-Cashable Electronic Promotion Out (NCEP Out)* means the total value of non-cashable credits electronically transferred from the gaming device or game to a promotional account by means of an external connection between the gaming device, or game and a cashless wagering system.

- 2-111. *Online gaming device monitoring system* means a system used by the gaming operation to monitor gaming device meter readings and/or other activities on an on-line basis.
- 2-112. *Order for credit* means a request for the transfer of cheques from a table to the cage. The order precedes the actual transfer transaction that is documented on a credit slip.
- 2-113. *Par percentage* means the percentage of each dollar wagered that the house wins (i.e., gaming operation advantage).
- 2-114. *Par sheet* means a specification sheet for a gaming device that provides device hold percentage, model number, hit frequency, reel combination, number of reels, number of coins that can be accepted, and reel strip listing.
- 2-115. *Patron* includes every person involved in a transaction to which this regulation applies with a gaming operation, whether that person participates, or intends to participate, in gaming activity offered by the gaming operation.
- 2-116. *Personally Identifiable Information (PII)* means any data that could potentially identify a specific individual. This can include direct identifiers like a person's name, Social Security Number, Driver's License Number, and other unique identifiers. It also encompasses data that, when combined with other information, can lead to the identification of an individual.
- 2-117. *Patron Account (aka "Patron Account", "Patron Wagering Account", "Patron Deposit Account", or "Cashless Account")* means an account maintained on behalf of a patron, for the deposit and withdrawal of funds for the primary purpose of interacting with a gaming activity by gaming operations for a patron where information relative to financial and cashless transactions are recorded on behalf of the patron including, but not limited to, deposits, withdrawals, wagers, winnings, and balance adjustments. The term does not include an electronic payment account, or an account used solely by gaming operations to track promotional points or credits, or similar benefits issued by the gaming operations to a patron which may be redeemed for merchandise and/or services.
- 2-118. *Patron Account Transfer (aka "Wagering Account Transfer", "Cashless Account Transfer")* means cashable patron funds electronically transferred to/from the cashless device from a patron account.
- 2-119. *Patron Account Transfer In (PAT in or WAT In)* means the total value of cashable credits electronically transferred to a game from a patron account by means of an external connection between the game and the CWS.
- 2-120. *Patron Account Transfer Out (PAT out or WAT out)* means the total value of cashable credits electronically transferred from the game to the patron account by means of an external connection between the game and the CWS.

- 2-121. *Patron tracking system* means a system, or a component of a computerized casino accounting system used to record the gaming play of individual patrons.
- 2-122. *Payment slip* means a part of a marker on which patron payments are recorded.
- 2-123. *Payout* means a transaction associated with a winning event.
- 2-124. *Personal Identification Number (PIN)* means the personal identifiable number used to access a patron's account.
- 2-125. *Pit* means the area in the middle of the table games used by gaming operation employees to deal games and supervise game play.
- 2-126. *Pit podium* means a stand located in the middle of the table games used by gaming operation supervisory employees as a workspace and a record storage area.
- 2-127. *Pit supervisor* means the employees who supervise all table games in a pit.
- 2-128. *Points* means a representative of value awarded to a patron based upon specific criteria established by the gaming operation.
- 2-129. *Prize payout* means a payment to a patron associated with a winning or qualifying event.
- 2-130. *Progressive gaming device* means a gaming device, with a payoff indicator, in which the payoff increases as it is played and may be linked to other devices. The payoff amount is accumulated, displayed on a gaming device, and will remain until a patron achieves the criteria that results in the progressive amount being paid.
- 2-131. *Progressive jackpot* means payout from a progressive gaming device or progressive table game.
- 2-132. *Progressive table games* mean table games that offer progressive jackpots.
- 2-133. *Promotion* means any promotional activity or award that requires game play as a condition of eligibility.
- 2-134. *Promotional account* means a patron account enabled to allow the direct electronic transfer of promotional giveaway credits, patron reward credits, or other sources of credits approved by the Gaming Commission to a gaming device or game. Transfers use an electronic promotion (i.e., CEP, NCEP) metering methodology to record activity.
- 2-135. *Promotional giveaway credits* mean credits based on pre-defined criteria outlined by the rules of the promotion, or approved procedures, where the patron provides no consideration and there is no chance or skill involved in the attainment of credits.

- 2-136. *Promotional payout* means merchandise or awards given to patrons by the gaming operation based on a wagering activity.
- 2-137. *Promotional progressive pots and/or pools* means funds contributed to a game by and for the benefit of patrons. Funds are distributed to patrons based on a pre-determined event.
- 2-138. *Promotional System* means a system which allows electronic transfers of credits bi-directionally between any promotional account and gaming device or game using a cashless system. These credits shall be metered as non-cashable or cashable promotional credits (i.e., NCEP or CEP).
- 2-139. *Random number generator (RNG)* means a software module, hardware component or combination of these designed to generate numbers, which are effectively random.
- 2-140. *Reel symbols* mean symbols listed on reel strips of gaming devices.
- 2-141. *Rejected currency* means currency that a currency counter has rejected due to the authenticity data (comparison of the note to a pre-determined standard) failing to confirm the legitimacy of the note.
- 2-142. *Rim credit* means an extension of credit that is not evidenced by the immediate preparation of a marker and does not include call bets.
- 2-143. *Risk management* means processes and tools that retail sports betting operators and/or supplies use to manage the risk and liabilities associated with sports betting.
- 2-144. *Runner* means an employee of the gaming operation who transports cheques or cash to/from a gaming table and a cashier.
- 2-145. *Settlement* means an agreement between the gaming operation and a patron to repay an outstanding debt owed or any portion of the outstanding debt.
- 2-146. *Shift* means an eight-hour period, unless otherwise approved by the Gaming Commission, not to exceed twenty-four hours.
- 2-147. *Shill* means an employee financed by the house and acting as a patron for the purpose of starting or maintaining enough patrons in a game.
- 2-148. *Soft count* means the count of the contents in a financial instrument storage component.
- 2-149. *Smart card* means a card that possesses the means to electronically store or retrieve account data.
- 2-150. *Special drop* means any drop in which the count services team must deviate from their approved drop schedule or route.

- 2-151. *Retail sports betting* means sports betting or wagering conducted in person at a licensed gaming operation regulated by the Gaming Commission.
- 2-152. *Sports betting operator or retail sports book* means a person or entity that is issued a retail sports betting operator license through the facility licensing process.
- 2-153. *Retail sports betting supplier* means a person or entity that the Gaming Commission has identified as requiring a Gaming Vendor License to provide a gaming operation any gaming services or concessions, gaming equipment, gaming devices, or supplies regarding the operation of a retail sports book. Retail sports betting supplier includes but is not limited to retail sports betting platform providers.
- 2-154. *Retail sports betting system* means the methodology and equipment approved by the Gaming Commission for accepting and recording of sports wagers authorized by these minimum internal controls and Gaming Commission Regulation – [Chapter 2](#).
- 2-155. *Retail sports betting wagers or bets* means a financial commitment, including free play, loyalty points, and other redeemable retail sports betting credits, risked on the outcome of an athletic event.
- 2-156. *Standard Operating Procedure (SOP)* means a set of fixed instructions or steps to carry out routine operations or tasks to ensure consistency and compliance with approved departmental procedures.
- 2-157. *Statements on Standards for Attestation Engagements (SSAE)* means promulgated by the Auditing Standards Board.
- 2-158. *Statistical drop* means total amount of money and cheques contained in the drop boxes, plus pit credit issued, minus pit credit payments in cash in the pit.
- 2-159. *Statistical win* means closing bankroll, plus credit slips for cash, or cheques returned to the cage, plus drop, minus opening bankroll, minus fills to the table, plus marker credits.
- 2-160. *Sufficient clarity* means the capacity of a surveillance system to record images at a minimum of 20 frames per second or equivalent recording speed and at a resolution sufficient to clearly identify the intended activity, person, object, or location.
- 2-161. *Surveillance Department* is a department with a system of video cameras, monitors, recorders, video printers, switches, selectors, and other ancillary equipment used for surveillance of the gaming facility.
- 2-162. *Surveillance operations room* means the secured area(s) where surveillance takes place and/or where active surveillance equipment is located.
- 2-163. *Surveillance system* means a system of video cameras, monitors, recorders, video printers, switches, selectors, and other equipment used for surveillance.

- 2-164. *Suspicious activity* means activity(ies) which involve structuring, which is the breaking down of monetary transactions in amounts under \$10,000.00 to avoid reporting under [Title 31 – Chapter X of the Bank Secrecy Act](#). Other suspicious activity that may require a Suspicious Activity Report by Casinos (SARC) include but is not limited to the following:
- a. Using more than one person, employees
  - b. Using large amounts of money with little or no activity and then cashing out
  - c. Providing false documents or information
  - d. Layering money to disguise their source
- 2-165. *Suspicious Activity Report by Casinos (SARC)* means a confidential form that contains information required by [Title 31 – Chapter X](#), and any other available information that is requested on the form for all suspicious financial transactions that may occur within the casino.
- 2-166. *System Administrator* is the individual(s) responsible for maintaining the stable operation of the IT environment (including software and hardware infrastructure and application software).
- 2-167. *System of Internal Control Standards (SICS)* means an overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures, and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.
- 2-168. *Table games* mean games that are banked by the house or a pool whereby the house or the pool pays all winning bets and collects from all losing bets.
- 2-169. *Table inventory* means the total coins, cheques, and markers at a table.
- 2-170. *Table inventory form* means the form used by gaming operation supervisory employees to document the inventory of cheques and coins on a table at the beginning and ending of a shift.
- 2-171. *Table tray* means the container located on a table game where cheques, coins, or cash are stored that are used in the game.
- 2-172. *Theoretical hold* means the intended hold percentage or wins of a gaming device as computed by reference to its payout schedule as set in the gaming device control program.
- 2-173. *Theoretical Hold Worksheet* means a worksheet provided by the manufacturer for all games that indicates the theoretical PAR percentages that the games should hold based on adequate levels of coin-in. The worksheet also indicates the reel strip settings, hit frequency, reel combinations, number of credits that may be played, the payout schedule, the number of reels and other information descriptive of the game.

- 2-174. *Tickets* mean a printed financial instrument issued by a gaming device which can be redeemed for cash or used to subsequently establish credits on a device.
- 2-175. *Ticket In/Ticket Out system (TITO)* means a system which has a centralized ticket validation component and allows for issuance, validation, and acceptance of tickets at TITO enabled gaming devices, and the validation and acceptance of tickets at kiosks or validation units, for gaming operations.
- 2-176. *Ticket validation component* means a function of the automated gaming device system whereby this system receives information about a ticket from a floor device and compares the ticket in question to the information in the system's database. This determines the validity of the ticket for redemption.
- 2-177. *Ticket redemption kiosk* means a device that uses real-time transaction processing to the TITO module of a gaming device monitoring system for redemption of tickets in exchange for currency and coin. Kiosks are not capable of gaming functionality and may not issue tickets in exchange for currency or coin.
- 2-178. *Tier C* means a gaming operation with annual gross gaming revenues of more than \$15 million.
- 2-179. *Tribal-State Compact (Compact)* means an agreement between the State of Michigan and the Little River Band of Ottawa Indians concerning Class III gaming approved or deemed approved by the Secretary of Interior and published in the Federal Register pursuant to [25 U.S.C. § 2710 \(d\)](#).
- 2-180. *Tribal Minimum Internal Control Standards (TMICS)* means minimum internal control standards established by the Little River Band of Ottawa Indians Gaming Commission.
- 2-181. *Vault* means a secure area within the gaming facility where checks, cash, coins, and cheques are stored.
- 2-182. *Voucher* means a financial instrument of fixed wagering value, usually paper, that can be used only to acquire an equivalent value of cashable credits or cash through interaction with a voucher system.
- 2-183. *Voucher system* means a system that securely maintains records of vouchers and coupons; validates payment of vouchers; records successful or failed payments of vouchers and coupons; and controls the purging of expired vouchers and coupons.
- 2-184. *Wager* means placing money at risk or something of value on a gambling game that has an uncertain outcome with the primary intent of winning additional money and/or personal property.

- 2-185. *Wide-area progressive gaming device* means a progressive gaming device that is linked to gaming devices in other gaming operations and play on the devices affect the progressive amount. As wagers are placed, the progressive meters on all the linked devices increase. Definition applies to shared linked progressives between gaming operations operated by the same Tribe and those linked and monitored by an independent wide-area service provider.
- 2-186. *Win* means the net win resulting from all gaming. Net win results from deducting all gaming losses from all wins prior to considering associated operating expenses.
- 2-187. *Win-to-write hold percentage* means win divided by write to determine hold percentage.
- 2-188. *Write-off* is the cancellation of a debt owed, and the outstanding balance is considered uncollectable.

### **Section 3. Tier C Gaming Compliance**

- 3-1. *Tribal Minimum Internal Control Standards (TMICS)*. The Gaming Commission shall, in accordance with the Gaming Ordinance, establish and implement TMICS that:
- a. Contain references and standards for currency transaction reporting that comply with [31 CFR – Chapter X](#) its amendments or successors.
  - b. Establish standards for all games utilized.
  - c. Establish a deadline, by which a gaming operation shall come into compliance with the TMICS.
- 3-2. *Gaming Operation*. Each gaming operation of the Little River Band of Ottawa Indians shall develop and implement a System of Internal Control Standards (SICS) that, at a minimum, comply with this regulation. The gaming operation's SICS shall be approved by the Gaming Commission prior to implementation.
- a. SICS
    1. Ethics and compliance. SICS shall include a statement of policy regarding ethical standards and compliance with tribal, state and federal laws. The statement shall prohibit employees from accepting gifts and gratuities from suppliers of goods or services, except in accordance with written policy submitted with the SICS.
    2. Gaming operations. All gaming operations that are operating on or before the effective date of this regulation shall comply with this section within the time requirements established by the Gaming Commission. In the interim, such operations shall continue to comply with existing approved TMICS.

- A. Each gaming operation shall establish, and the Gaming Commission shall approve all departmental procedures, and any procedures required by this regulation. Departmental procedures shall include game and asset protection standards.
  - B. Gaming operation Standard Operating Procedures (SOP) shall comply with approved departmental procedures as required in [Section 3-2 \(a\) \(2\) \(A\)](#). Approved departmental procedures supersede the requirements of the SOPs. SOPs shall not violate the departmental procedures. SOPs do not require Gaming Commission approval.
- 3. New gaming operations. All gaming operations that commence operations after the effective date of this regulation shall comply with this regulation before commencement of operations.
  - b. Amendments. If the Gaming Commission determines that a gaming operation's SICS or departmental procedures do not comply with the requirements of this regulation or require improvements, the Gaming Commission shall notify the gaming operation in writing. Within fifteen (15) calendar days of notification, the gaming operation shall amend its i.e. SICS and/or departmental procedures accordingly and shall submit the amendments for approval.
  - c. Procedures. Any changes to departmental procedures shall be approved by the Gaming Commission prior to implementation. Changes to SOPs shall be reported to the Gaming Commission within fifteen (15) calendar days. The Gaming Commission shall then determine if the proposed changes to SOPs require inclusion into the departmental procedures.
- 3-3. *Variances*. Where referenced throughout this regulation, the gaming operation shall set a reasonable threshold approved by the Gaming Commission, for when a variance shall be reviewed to determine the cause. Variance reviews shall be documented with sufficient evidence to support the review, and any determinations made.
- 3-4. *Supervision*. Supervision shall be provided, as needed, for all departments by employees with equal to or greater than those being supervised.
- 3-5. *Time Computation*. All days are counted as calendar days, unless otherwise specified.
- 3-6. *Computer Applications*. For any computer application utilized, alternate documentation and/or procedures that provide at least the level of control established by the standards of this regulation, as approved in writing by the Gaming Commission, will be acceptable.
  - a. All computer application passwords shall remain confidential to the individual user and shall not be shared.

- b. For computers in public areas, all employees shall lock the computer screen or log off the computer/application before leaving the work area.
- 3-7. *Contracts.* The gaming operation shall maintain a central repository for all contracts related to the gaming operation and that repository shall be on premises.
- 3-8. *Dual Rate(s).* When performing “dual rate” functions the following standards shall apply:
- a. The gaming operation shall maintain a current list of all employees (by department) who are allowed to dual rate; and
  - b. When performing a dual rate function, the employee(s) shall only have authority and access for the position they are performing. (e.g., a dual rate performing the dealer function shall not have supervisor level access to critical IT systems.). Dual rate positions shall not create a lapse in the segregation of duties.
- 3-9. *Sensitive Areas.* Are those areas of the gaming operation that require strict access control. Sensitive areas include, but are not limited to pits, count room, cart storage room, cage, vault, gaming device maintenance/storage rooms, areas housing critical IT systems and equipment, card/dice/gaming equipment storage rooms.
- 3-10. *New Technology.* Portions of this regulation should not be read in such a way that limits the use of technology. These standards should not be interpreted if technology is not mentioned that it is not allowed. As new technology is developed, the Gaming Commission will make changes and incorporate new standards to cover the new technology.
- 3-11. *Federal Reporting and Withholding Requirements for Gambling Winnings.* All gaming operations shall comply with federal reporting and withholding requirements for gambling winnings as established by Internal Revenue Code and Treasury Requirements: [26 CFR § 7.6041-1 \(b\)\(1\)](#); [26 CFR § 31.3402\(q\)-1](#); [26 CFR § 31.3406](#); [IRS Form W2-G Instructions](#), [IRS Publication 3079](#), and any pertinent [Internal Revenue Bulletin](#). Beginning in 2027, the IRS will update the reporting threshold indexed annually for inflation.

#### **Section 4. The Tribal Minimum Internal Control Standards (TMICS) and the Tribal-State Compact (Compact)**

- 4-1. If there is a direct conflict between an internal control standard established in the Compact and a standard or requirement set forth in this regulation, then the internal control standard established in a Compact shall prevail.
- 4-2. If an internal control standard in the Compact provides a level of control that equals or exceeds the level of control under an internal control standard or requirement set forth in this regulation, then the Compact standard shall prevail.
- 4-3. If an internal control standard or a requirement set forth in this regulation provides a level of control that exceeds the level of control under an internal control standard established in the

Compact, then the internal control standard or requirement set forth in this regulation shall prevail.

## **Section 5. Table Games**

- 5-1. *Supervision.* Refer to [Section 3-4](#).
- 5-2. *Standards for Drop and Count.* Refer to [Section 10](#).
- 5-3. *Computer Applications.* Refer to [Section 3-6](#).
- 5-4. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for the following: table games performance standards and analysis; storage of gaming equipment and supplies; issued and unissued fill/credit slips; storage of used cards, dice, and layouts; destruction of used cards, dice, and layouts; marker play and forms; named credit instruments accepted in the pit; call bets; rim credits; hand clearing; cheque changes; shuffle checks; mid shoe entry; call-out; card and dice inspection; uniform ranking of hands; and transfer of residual credits from removed progressive table games, any additional procedures required by this regulation or at the direction of the Gaming Commission.
- 5-5. *Fill and Credit Standards.*
- a. Fill slips and credit slips must be in at least triplicate form, and in a continuous, prenumbered series. Such slips must be concurrently numbered in a form utilizing the alphabet and only in one (1) series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.
  - b. Unissued and issued fill/credit slips must be safeguarded and adequate procedures must be employed in their distribution, use, and control. Employees from the cage or Table Games Department must have no access to the secured (control) copies of the fill/credit slips.
  - c. When a fill/credit slip is voided, the cashier must clearly mark “void” across the face of the original and first copy, the cashier and one (1) other employee independent of the transactions must sign both the original and first copy and must submit them to Accounting/Revenue Audit for retention and accountability.
  - d. Fill transactions must be authorized by pit supervisory employees before the issuance of fill slips and transfer of cheques, or cash equivalents. The fill request must be communicated to the cage where the fill slip is prepared.
  - e. At least three (3) parts of each fill slip must be utilized as follows:
    1. One (1) part must be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box.
    2. One (1) part must be retained in the cage for reconciliation of the cashier bank.

- f. For computer systems, one (1) part must be retained in a secure manner to ensure that only authorized employees may gain access to it. For manual systems, one (1) part must be retained in a secure manner in a continuous unbroken form.
- g. The table number, shift, and amount of fill by denomination and in total must be noted on all copies of the fill slip. The correct date and time must be indicated on at least two (2) copies.
- h. All fills shall be carried from the cage by an employee who is independent of the cage or Table Games Department.
- i. The fill slip must be signed by at least the following employees (as an indication that each has counted the amount of the fill, and the amount agrees with the fill slip):
  - 1. Cashier who prepared the fill slip and issued the cheques, or cash equivalent
  - 2. Runner who carried cheques or cash equivalents from the cage to the pit
  - 3. Dealer who received the cheques, or cash equivalents at the gaming table
  - 4. Pit supervisory employees who supervised the fill transaction
- j. Fills must be broken down and verified by the dealer in public view before the dealer places the fill in the table tray.
- k. A copy of the fill slip must then be deposited into the table game drop box by the dealer, where it must appear in the soft count room with the cash receipts for the shift.
- l. Table credit transactions must be authorized by pit supervisory employees before the issuance of credit slips and transfer of cheques, or other cash equivalent. The credit request must be communicated to the cage where the credit slip is prepared.
- m. At least three (3) parts of each credit slip must be utilized as follows:
  - 1. Two (2) parts of the credit slip must be transported by the runner to the pit. After signatures of the runner, dealer, and pit supervisory employees are obtained, one (1) copy must be deposited in the table game drop box, and the original must accompany transport of the cheques, markers, or cash equivalents from the pit to the cage for verification and signature of the cashier.
  - 2. For computer systems, one (1) part must be retained in a secure manner to ensure that only authorized employees may gain access to it. For manual systems, one (1) part must be retained in a secure manner in a continuous unbroken form.
- n. The table number, shift, and the amount of credit by denomination and in total must be noted on all copies of the credit slip. The correct date and time must be indicated on at least two (2) copies.
- o. Cheques and/or cash equivalents must be removed from the table tray by the dealer and must be broken down and verified by the dealer in public view prior to placing them in racks for transfer to the cage.

- p. All cheques and cash equivalents removed from the tables and markers removed from the pit must be carried to the cashier's cage by an employee who is independent of the cage or pit.
- q. The credit slip must be signed by at least the following employees (as an indication that each has counted or, in the case of markers, reviewed the items transferred):
  - 1. Cashier who received the items transferred from the pit and prepared the credit slip
  - 2. Runner who carried the items transferred from the pit to the cage
  - 3. Dealer who had custody of the items prior to transfer to the cage
  - 4. Pit supervisory employees who supervised the credit transaction
- r. The credit slip must be inserted in the table game drop box by the dealer
- s. Cheques or other cash equivalents must be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit or marker transfer forms.
- t. Cross fills (the transfer of cheques between table games) and even cash exchanges are prohibited in the pit.

5-6. *Table Inventory Forms.*

- a. At the close of each shift, for those table banks that were opened during that shift:
  - 1. The table's cheque, and marker inventory must be counted and recorded on a table inventory form; or
  - 2. If the table banks are maintained on an imprest basis, a final fill or credit must be made to bring the bank back to par.
- b. If final fills are not made, beginning and ending inventories must be recorded on the master game sheet for shift win calculation purposes.
- c. The accuracy of inventory forms prepared at shift end must be verified by the outgoing pit supervisory employees and the dealer. Alternatively, if the dealer is not available, such verification may be provided by another pit supervisor or another supervisor from another gaming department. Verifications must be evidenced by signature on the inventory form.
- d. If inventory forms are placed in the drop box, such action must be performed by an employee other than a pit supervisor.

5-7. *Table Games Computer Generated Documentation Standards.*

- a. The computer system must be capable of generating adequate documentation of all information recorded on the source documents and transaction details (e.g., fill/credit slips, markers, etc.).
- b. This documentation must be restricted to authorized employees only.

- c. The documentation must include, at a minimum:
  - 1. System exception information (e.g., appropriate system parameter information, corrections, voids, etc.)
  - 2. Employees access listing
  - 3. Employees' name or employee identification number (if applicable)
  - 4. Listing of functions employees can perform or equivalent means of identifying the same

5-8. *Standards for Playing Cards and Dice.*

- a. All cards, dice, and layouts utilized by the gaming operation shall be approved by the Gaming Commission in accordance with Gaming Commission Regulation – [Chapter 2](#).
- b. Playing cards, dice, and layouts must be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.
- c. Used cards, dice, and layouts must be maintained in a secure location until marked, scored, or destroyed, in a manner as approved by the Gaming Commission, to prevent unauthorized access and reduce the possibility of tampering.
- d. Controls shall be established, and procedures implemented that establish a reasonable time, within which to mark, cancel, or destroy cards, dice, and layouts from play.
  - 1. This standard does not apply where playing cards, dice, or layouts are retained for an investigation.
    - A. A card, dice, and layout control log must be maintained that documents when cards, dice, and layouts are received on site, distributed to and returned from tables and removed from play by the gaming operation.

5-9. If the gaming operation uses plastic cards (not plastic-coated cards), the cards may be used for up to three (3) months if the plastic cards are routinely inspected and washed or cleaned in a manner and time frame approved by the Gaming Commission.

5-10. *Analysis of Table Game Performance Standards.*

- a. Records must be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift.
- b. Records reflecting hold percentage by table and type of game must be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date.
- c. This information must be presented to and reviewed by management independent of the pit department on at least a monthly basis.
- d. Management referenced in [Section 5-10 \(c\)](#) of this section must investigate all unusual fluctuations in hold percentage with pit supervisory employees.

- e. The results of all analyses/investigations must be documented, maintained for inspection, and submitted to the Gaming Commission in accordance with Gaming Commission Regulation – [Chapter 4](#).

5-11. *Marker Credit Play.*

- a. If the gaming operation allows marker credit play (exclusive of rim credit and call bets), the following standards shall apply:
  - 1. A marker system must allow for credit to be both issued and repaid in the pit.
  - 2. Prior to the issuance of gaming credit to a patron, employees extending the credit must contact a credit reporting bureau to determine if the patron's credit limit has been properly established and there is sufficient remaining credit available for the advance.
  - 3. Proper authorization of credit extension more than the previously established limit must be documented.
  - 4. The amount of credit extended must be communicated to the independent source and the amount documented within a reasonable time after each issuance.
  - 5. The marker form must be prepared in at least triplicate form with a preprinted or concurrently printed marker number and utilized in numerical sequence. (This requirement must not preclude the distribution of batches of markers to various pits.)
  - 6. At least three (3) parts of each separately numbered marker form must be utilized as follows:
    - A. Original must be maintained in the pit until settled or transferred to the cage.
    - B. Payment slip must be maintained in the pit until the marker is settled or transferred to the cage. If paid in the pit, the slip must be inserted in the table game drop box. If not paid in the pit, the slip must be transferred to the cage with the original.
    - C. Issue slip must be inserted into the appropriate table game drop box when credit is extended or when the patron has signed the original.
  - 7. When marker documentation (e.g., issue slip and payment slip) is inserted in the drop box, such action must be performed by the dealer at the table.
  - 8. A record must be maintained that details the following (e.g., master credit record retained at the pit podium):
    - A. The signature or initials of employees approving the extension of credit (unless such information is contained elsewhere for each issuance)
    - B. The legible name of the person receiving the credit

- C. The date and shift of granting the credit
  - D. The table on which the credit was extended
  - E. The amount of credit issued
  - F. The marker number
  - G. The amount of credit remaining after each issuance or the total credit available for all issuances
  - H. The amount of payment received and nature of settlement (e.g., credit slip number, cash, cheques, etc.)
  - I. The signature or initials of the employees receiving payment/settlement.
9. The forms required in [Section 5-11 \(a\) \(1\) \(5\) \(6\) and \(8\)](#) must be safeguarded, and adequate procedures must be employed to control the distribution, use, and access to these forms.
  10. All credit extensions must be initially evidenced by lammer buttons, which must be displayed on the table in public view and placed there by supervisory employees.
  11. Marker preparation must be initiated, and other records updated within approximately one hand of play following the initial issuance of credit to the patron.
  12. Only the dealer moves lammer buttons from the table into the table tray or moves lammer buttons to a neutral area for subsequent removal by pit supervisory employees. This procedure is performed when the marker issue slip is placed in the table game drop box.
  13. The original marker must contain at least the following information:
    - A. Marker number
    - B. Patron's name and signature
    - C. Date
    - D. Amount of credit issued
  14. The issue slip or stub must include the same marker number as the original, the table number, date and time of issuance, and amount of credit issued. The issue slip or stub must also include the signature of the employees extending the credit, and the signature or initials of the dealer at the applicable table, unless this information is included in another document verifying the issued marker. The payment slip must include the same marker number as the original. When the marker is paid in full in the pit, it must also include the table number where paid, date and time of payment, nature of settlement (cash, cheques, etc.), and amount of payment. The payment slip must also include the signature of pit supervisory

employees acknowledging payment, and the signature or initials of the dealer receiving payment, unless this information is included on another document verifying the payment of the marker.

15. When partial payments are made in the pit, a new marker must be completed reflecting the remaining balance and the marker number of the marker originally issued.
16. When partial payments are made in the pit, the payment slip of the marker that was originally issued must be properly cross-referenced to the new marker number, completed with all information required by [Section 5-11 \(a\) \(15\)](#), and inserted into the drop box.
17. The independent source must be notified when payments (full or partial) are made in the pit so that cage records can be updated for such transactions. Notification must be made no later than when the patron's play is completed or at shift end, whichever is earlier.
18. All portions of markers, both issued and unissued, must be safeguarded and procedures must be employed to control the distribution, use and access to the forms.
19. An investigation must be performed to determine the cause and responsibility for loss whenever marker forms, or any part thereof, are missing. These investigations must be documented, maintained for inspection, and provided to the Gaming Commission upon request.
20. When markers are transferred to the cage, marker transfer forms or marker credit slips (or similar documentation) must be utilized and such documents must include, at a minimum, the date, time, shift, marker number(s), table number(s), amount of each marker, the total amount transferred, signature of pit supervisory employees releasing instruments from the pit, and the signature of employees verifying receipt of instruments at the cage.
21. All markers must be transferred to the cage within twenty-four (24) hours of issuance.
22. Markers must be transported to the cage by an employee who is independent of the marker issuance and payment functions.

5-12. *Name Credit Instruments Accepted in the Pit.*

- a. For the purposes of this paragraph, name credit instruments mean personal checks, payroll checks, counter checks, hold checks, traveler's checks, or other similar instruments that are accepted in the pit as a form of credit issuance to a patron with an approved credit limit.
- b. The following standards must apply if name credit instruments are accepted in the pit:

1. A name credit system must allow for the issuance of credit without using markers.
2. Prior to accepting a name credit instrument, the employees extending the credit must contact the cashier or another independent source to determine if the patron's credit limit has been properly established and the remaining credit available is sufficient for the advance.
3. All name credit instruments must be transferred to the cage (utilizing a two (2) part order for credit) immediately following the acceptance of the instrument and issuance of cheques (if name credit instruments are transported accompanied by a credit slip, an order for credit is not required).
4. The order for credit (if applicable) and the credit slip must include the patron's name, amount of the credit instrument, the date, time, shift, table number, signature of pit supervisory employees releasing instrument from pit, and the signature of the employees verifying receipt of instrument at the cage.
5. The procedures for transacting table credits referenced in [Section 5-5 \(k\)-\(o\)](#) must be strictly adhered to; and
6. The acceptance of payments in the pit for name credit instruments shall be prohibited.

5-13. *Call Bets.*

- a. The following standards must apply if call bets are accepted in the pit:
  1. A call bet must be evidenced by the placement of a lammer button, cheques, or other identifiable designation in an amount equal to that of the wager in a specific location on the table.
  2. The placement of the lammer button, cheques, or other identifiable designation must be performed by supervisory/boxperson employees. The placement may be performed by a dealer only if the supervisor physically observes and gives specific authorization.
  3. The call bet must be settled at the end of each hand of play by the preparation of a marker, repayment of the credit extended, or the payoff of the winning wager. Call bets extending beyond one (1) hand of play must be prohibited.
  4. Only the dealer moves lammer buttons from the table into the table tray or moves lammer buttons to a neutral area for subsequent removal by pit supervisory employees. This procedure is performed at the completion of the call bet transaction.

5-14. *Rim Credit.*

- a. The following standards must apply if rim credit is extended in the pit:

1. Rim credit shall be evidenced by the issuance of cheques to be placed in a neutral zone on the table and then extended to the patron for the patron to wager, or to the dealer to wager for the patron, and by the placement of a lammer button or other identifiable designation in an amount equal to that of the cheques extended; and
2. Rim credit must be recorded on patron cards, or similarly used documents, which must be:
  - A. Prenumbered or concurrently numbered and accounted for by a department independent of the Table Games Department
  - B. For all extensions and subsequent repayments, evidenced by the initials or signatures of a supervisor and the dealer attesting to the validity of each credit extension and repayment
  - C. An indication of the settlement method (e.g., serial number of markers issued, cheques, cash)
  - D. Settled no later than when the patron leaves the table at which the card is prepared
  - E. Transferred to the Accounting/Revenue Audit Department daily
  - F. Reconciled with other forms utilized to control the issuance of pit credit (e.g., master credit records, table cards)

5-15. *Table Games In-House Progressive Standards.*

- a. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed at the progressive table game.
- b. The gaming operation shall record the amount shown on each progressive jackpot meter at the gaming operation daily, except for those less than \$1,000.00.
- c. Explanations for meter reading decreases shall be maintained with the progressive display meter reading sheets, and where the payment of a jackpot is the explanation for a decrease, the gaming operation shall record the jackpot reference number on the sheet or have the reference number reasonably available.
- d. The gaming operation shall record the base amount of each progressive jackpot the gaming operation offers.
- e. The Gaming Commission shall approve procedures specific to the transfer of progressive amounts more than the base amount (residual credits) to other progressive table games that accrue to the benefit of the table game's patrons.
  1. The gaming operation shall not "hold" these residual credits for more than sixty (60) calendar days.

2. The gaming operation shall make every effort to inform the public of the disposition of the residual credits.
3. The gaming operation may offer the residual credits through other methods of distribution that accrue to the benefit of the table game's patrons via an award or prize. Such forms of distribution shall be approved, by the Gaming Commission, on a case-by-case basis.

5-16. *Foreign Currency.* Foreign currency shall not be accepted at the table games.

5-17. All relevant controls from [Section 8 – Information Technology](#) will apply.

5-18. *Revenue Audit.* Standards for revenue audit of table games are found in [Section 18](#).

5-19. [Promotions, Drawings, Giveaways, and Tournaments](#). All promotional activities shall comply with all applicable sections of these minimum internal controls.

5-20. *Variance.* Refer to [Section 3-3](#).

## **Section 6. Gaming Devices**

6-1. *Supervision.* Refer to [Section 3-4](#).

6-2. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for the following: gaming device performance standards and analysis; storage of gaming devices, equipment and supplies; payment of tickets that exceed \$9,999.99; disposition of tickets found by employees; annual verification of control program programs; removal of control program; verification of deleted control program; receipt and destruction of control program; security and access to control program; auditing of gaming device system components; malfunction procedures; removal, retirement and/or destruction of gaming devices or components; physical destruction of gaming devices and/or components; transfer of residual credits from removed progressive games; and any other procedure required by this regulation or at the direction of the Gaming Commission.

6-3. *Standards for Gaming Devices.*

- a. For this section only, credit or patron credit means a unit of value equivalent to cash or cash equivalents deposited, wagered, won, lost, or redeemed by a patron.
- b. An assigned gaming device access card shall be used whenever an employee of the gaming operation opens a gaming device. This card will indicate to the gaming device accounting system by whom and when a gaming device was opened. Will immediately notify Surveillance of any attempted or actual unauthorized entry.
  1. An alternative paper record is acceptable. This alternative record shall be specific to each gaming device and stored inside of the assigned gaming device.

6-4. *Standards for Drop and Count.* Refer to [Section 10](#).

6-5. *Computer Applications.* Refer to [Section 3-6](#) for alternate computer application requirements.

- 6-6. *Jackpot Prize Payout and Fills.* Controls must be established, and procedures implemented for jackpot prize payout and fills that address the following:
- a. Identification of the employees authorized (by position) to make a payout
  - b. Predetermined payout authorization levels (by position)
  - c. Computerized jackpot/fill systems shall be restricted to prevent unauthorized access and fraudulent payouts by one (1) person
  - d. Payout forms shall be controlled and routed in a manner that precludes anyone from producing a fraudulent payout by forging signatures or by altering the amount paid out after the payout and misappropriating the funds.
  - e. Documentation procedures ensuring separate control of the cash accountability functions. Documentation at minimum must include the following information:
    1. Date and time
    2. Device number
    3. Dollar amount of cash payout or gaming device fill (both alpha and numeric) or description of personal property awarded, including fair market value. (Alpha is optional if another unalterable method is used for evidencing the amount of the payout).
    4. Game outcome (including reel symbols, card values, suits, etc.) for jackpot payouts. Game outcome is not required if a computerized jackpot/fill system is used.
    5. Preprinted or concurrently printed sequential number
  - f. Verification.
    1. For payouts, at least two (2) employees must verify that the winning pattern has been achieved prior to the payment of a prize. The system may serve as one (1) of the verifiers.
    2. For automated payouts, the system may serve as the sole verifier that a winning pattern has been achieved.
  - g. Authorization and signatures.
    1. At least two (2) employees must authorize, sign, and witness all manual prize payouts in accordance with the requirements of Section 3-11.
    2. Manual jackpot prize payouts above \$60,000.00 (or the dollar value adjusted annually for inflation as calculated by the Gaming Commission) must require one (1) of the two (2) signatures and verifications to be supervisory or management employees independent of Slot Operations Department.
      - A. Jackpots over this level must be verified by Gaming Commission staff

3. Predetermined thresholds must be authorized by management and approved by the Gaming Commission.
  4. A gaming system may substitute for one (1) authorization/signature verifying or authorizing a win but may not substitute for a supervisory or management authorization/signature.
- h. Payout records, including manual payout records, must include the following information:
1. Date and time
  2. Amount of the payout (alpha and numeric for gaming device payouts)
  3. Device identifier
  4. Signature of all, but not less than two (2) employees involved in the transaction
  5. For override transactions, verification by supervisory or management employees independent of the transaction
  6. Any other information necessary to substantiate the payout
- i. Computerized jackpot/ systems shall be restricted to prevent unauthorized access and fraudulent payouts by one (1) person.
- j. Payout forms shall be controlled and routed in a manner that precludes one (1) person from producing a fraudulent payout by forging signatures or by altering the amount paid out after the payout and misappropriating the funds.
- 6-7. *Gaming Devices and Components.* Controls must be established, and procedures implemented to safeguard the integrity of gaming devices and components during installations, operations, modifications, removal, and retirements. Such procedures must be compliant with Gaming Commission Regulation – [Chapter 2](#) and include the following:
- a. Shipping and receiving.
1. A communication procedure must be established between the licensed gaming vendors, the gaming operation, and the Gaming Commission to properly control the shipping and receiving of all control programs, gaming devices and gaming equipment and supplies. Such procedures must include:
    - A. Notification of pending shipments must be provided to the Gaming Commission by the gaming operation
    - B. Certification by an independent test lab (if technical standards apply through tribal law or compact)
    - C. Notification from the licensed gaming vendor to the Gaming Commission of the shipping date and expected date of delivery. The shipping notification must include:

- i. Name and address of the supplier
    - ii. Description of shipment
    - iii. Gaming device serial number
    - iv. Control program version and description of control program
    - v. Method of shipment
  - 2. Procedures must be implemented for the gaming device system components for maintenance and replacement.
    - A. Gaming device components must be shipped in a secure manner to deter unauthorized access.
    - B. The Gaming Commission must receive all controlled gaming device system components and game play control program packages and verify the contents against the shipping notification.
- b. Access credential control methods
  - 1. Controls must be established to restrict access to gaming device system components.
- c. Recordkeeping and audit processes
  - 1. The gaming operation must maintain the following records, as applicable, related to installed gaming device system components:
    - A. Date placed into service
    - B. Date made available for play
    - C. Supplier
    - D. Control program version
    - E. Serial Number
    - F. Game theme or other similar identifying information
    - G. Asset and/or location number
    - H. Seal number
    - I. Initial meter reading
  - 2. Procedures must be implemented for auditing such records in accordance with [Section 17](#).
- d. System software signature verification.
  - 1. Procedures must be implemented for system software verifications. These procedures must include comparing signatures generated by the verification

- programs to the signatures provided in the independent test laboratory letter for that software version.
2. An employee independent of the Slot Operations Department must perform system software signature verification(s) to verify that only approved software is installed.
  3. Procedures must be implemented to investigate and resolve any software verification variances.
  4. Verifications must be conducted as set forth in [Section 18](#). Such verifications must be documented.
- e. Game control program or other equivalent game control program media standards.
1. At least annually, procedures shall be performed to ensure the integrity of a sample of gaming device control programs or other equivalent game control program media, by employees independent of the Slot Operations Department or the devices being tested.
  2. The gaming operation, subject to the approval of the Gaming Commission, shall develop and implement procedures for the following:

Removal of game control programs or other equivalent game control program media from devices, the verification of the existence of errors as applicable, and the correction via duplication from the master game control program or other equivalent game control program media.

    - A. Copying one gaming device control program to another approved control program
    - B. Verification of duplicated game program or other equivalent game software media before being offered for play
    - C. Receipt and destruction of game control program or other equivalent game control program media
    - D. Securing game control program or other equivalent game control program media and duplicator from unrestricted access
  3. The master game control program number, par percentage, and the pay table shall be verified to the par sheet when initially received from the manufacturer.
  4. Gaming devices shall have the game control program circuit boards locked or physically sealed. The lock or seal shall necessitate the presence of a person independent of the Slot Operations Department to access the game control program circuit boards. If a seal is used to secure the control program to the circuit board, it shall be pre-numbered.
- f. Installation testing.

1. Testing must be completed during the installation process to verify that the gaming device component has been properly installed. This must include testing the following, as applicable:
  - A. Communication with the gaming system
  - B. Communication with the accounting system
  - C. Communication with the patron tracking system
  - D. Currency and vouchers to bill acceptors
  - E. Voucher printing
  - F. Meter incrimination
  - G. Pay table for verification
  - H. Gaming device denomination for verification
  - I. All buttons to ensure that all are operational and programmed appropriately
  - J. System components to ensure that they are safely installed at location
  - K. Locks to ensure that they are secure and functioning
- g. Display of rules and necessary disclaimers. The gaming operation must verify that all game rules and disclaimers are always displayed or made readily available to the patron upon request.
- h. Gaming Commission approval of all gaming devices before they are offered for play.
- i. Dispute resolution.

6-8. *Operations.*

- a. Malfunctions. Procedures must be implemented to investigate, document, and resolve malfunctions. Such procedures must address the following:
  1. Determination of the event causing the malfunction
  2. Review of relevant records, game recall, reports, logs, surveillance records
  3. Repair or replacement of the gaming component
  4. Verification of the integrity of the gaming component before restoring it to operation
- b. Removal, retirement, and/or destruction. Procedures must be implemented to retire or remove any or all associated components of a gaming device from operation. Procedures must include the following:
  1. For gaming devices and components that accept cash or cash equivalents:

- A. Coordinate with the Count Services Team to perform a final drop
  - B. Collect final accounting information such as meter readings, drop and payouts
  - C. Remove and/or secure any or all associated equipment such as locks, card reader, or ticket printer from the retired or removed component
  - D. Document removal, retirement, and/or destruction
2. For removal of control program components:
- A. Uninstall and/or return the control program to the license gaming vendor.
  - B. Document the removal.
- c. For all components:
- 1. Verify that unique identifiers, and descriptions of the removed/retired components are recorded as part of the retirement documentation
  - 2. Coordinate with Accounting/Revenue Audit to properly retire the component in the system records
- d. Where the Gaming Commission authorizes destruction of any gaming system components, procedures must be developed to destroy such components. Such procedures must include the following:
- 1. Methods of destruction
  - 2. Destruction must take place under surveillance camera(s)
  - 3. Documentation of all components destroyed
  - 4. Signatures of employees(s) destroying components attesting to destruction

6-9. *Vouchers/Tickets.*

- a. Controls must be established, and procedures implemented to:
- 1. Verify the authenticity of each voucher redeemed
  - 2. If the voucher is valid, verify that the patron is paid the appropriate amount
  - 3. Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.
  - 4. Retain payment documentation for reconciliation purposes
  - 5. For manual payment of a voucher in an amount established by management and approved by the Gaming Commission, require a supervisory employee to verify the validity of the voucher prior to payment.

- b. Vouchers/Tickets paid during a period while the voucher system is temporarily out of operation must be marked “paid” by the cashier.
- c. Vouchers/Tickets redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system.
- d. Paid vouchers must be maintained in the cashier's accountability for reconciliation purposes.
- e. Unredeemed vouchers can only be voided in the voucher system by supervisory employees. Accounting/Revenue Audit will maintain the voided voucher, if available.

6-10. *Standards for Evaluating Theoretical and Actual Hold Percentages.*

- a. Accurate and current theoretical hold worksheets shall be maintained for each gaming device.
- b. For multi-game/multi-denominational devices, an employee independent of the Gaming Operations Department shall:
  - 1. Weekly, record the total coin-in meter
  - 2. Quarterly, record the coin-in meters for each pay table contained in the device
  - 3. On an annual basis, adjust the theoretical hold percentage in the gaming device statistical report to a weighted average based upon the ratio of coin-in for each game pay table
- c. If the gaming operation is unable to perform the weighted average calculation as required by [Section 6-10 \(b\)](#), the following procedures shall apply
  - 1. On at least an annual basis, calculate the actual hold percentage for each gaming device.
  - 2. On at least an annual basis, adjust the theoretical hold percentage in the gaming device statistical report for each gaming device to the previously calculated actual hold percentage.
  - 3. The adjusted theoretical hold percentage shall be within the spread between the minimum and maximum theoretical payback percentages.
- d. The adjusted theoretical hold percentage for multi-game/multi-denominational devices may be combined for devices with the same game mix throughout the year.
- e. The theoretical hold percentages used in the gaming device analysis reports should be within the performance standards set by the manufacturer.
- f. Records shall be maintained for each device indicating the dates and type of changes made and the recalculation of theoretical hold because of the changes.

- g. Records shall be maintained for each device that indicate the date the device was placed into service, the date the device was removed from operation, the date the device was placed back into operation, and any changes in device numbers and designations.
- h. All the gaming devices shall contain functioning meters that shall record coin-in or credit-in, or online gaming device monitoring system that captures similar data.
- i. All gaming devices with bill acceptors shall contain functioning billing meters that record the dollar amounts or number of bills accepted by denomination.
- j. Gaming device in-meter readings shall be recorded at least weekly immediately prior to or after a gaming device drop. Online gaming device monitoring systems can satisfy this requirement. However, the time between reading may extend beyond one (1) week for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days.
- k. The employees who record the in-meter reading shall either be independent of the count team or shall be assigned on a rotating basis, unless the in-meter readings are randomly verified quarterly for all gaming devices and bill acceptors by an employee other than the regular in-meter reader.
- l. Upon receipt of the meter reading summary, Accounting/Revenue Audit shall review all meter readings for reasonableness using pre-established parameters.
- m. Prior to final preparation of statistical reports, meter readings that do not appear reasonable shall be reviewed with the Gaming Operations Department or other appropriate designees, and exceptions documented, so that meters can be repaired or clerical errors in the recording of meter readings can be corrected.
- n. A report shall be produced at least monthly showing month-to-date, year-to-date (previous twelve (12) months preferred), and if practicable, life-to-date actual hold percentage computations for individual devices and a comparison to each device's theoretical hold percentage previously discussed.
- o. Each change to a gaming device's theoretical hold percentage, including progressive percentage contributions, shall result in that device being treated as a new device in the statistical reports (e.g., not commingling various hold percentages), except for adjustments made in accordance with [Section 6-11 \(b\)](#).
- p. If promotional payouts or awards are included on the gaming device statistical reports, it shall be in a manner that prevents distorting the actual hold percentages of the affected devices.
- q. The statistical reports shall be reviewed by both Gaming Operations Department management and management independent of the Gaming Operations Department on at least a monthly basis.
- r. For those gaming devices that have experienced a level of wagering transactions (as established by the gaming operations and approved by the Gaming Commission), large variances between theoretical hold and actual hold shall be investigated and resolved by

a department independent of the Gaming Operations Department. The threshold for the variance as established by the gaming operations and approved by the Gaming Commission.

- s. Maintenance of the online gaming device monitoring system data files shall be performed by a department independent of the Gaming Operations Department. Alternatively, maintenance may be performed by Gaming Operations Department supervisory employees if sufficient documentation is generated, and it is randomly verified monthly by employees independent of the Gaming Operations Department.
- t. Updates to the online gaming device monitoring system to reflect additions, deletions, or movements of gaming devices shall be made at least weekly prior to in-meter readings and the weigh process.

6-11. *Gaming Device Drop Standards for Temporarily or Permanently Removed Gaming Devices.*

- a. When devices are temporarily removed from the floor, the gaming device drop shall be protected to preclude the misappropriation of stored funds.
- b. When devices are permanently removed from the floor, the gaming device drop shall be counted and recorded by at least two (2) employees with appropriate documentation being routed to Accounting/Revenue Audit for proper recording and accounting.

6-12. *In-House Progressive Gaming Device Standards.*

- a. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed at or near the devices to which the jackpot applies.
- b. At least once each day, the gaming operation shall record the amount shown on each progressive jackpot meter except for those jackpots that can be paid directly from the gaming device.
- c. Explanations for meter reading decreases shall be maintained with the progressive meter reading sheets, and where the payment of a jackpot is the explanation for a decrease, the gaming operation shall record the jackpot payout number on the sheet or have the number available upon request.
- d. The gaming operation shall record the base amount of each progressive jackpot the gaming operation offers.
- e. Controls and procedures specific to the transfer of progressive amounts more than the base amount to other gaming devices must be approved by the Gaming Commission. Such procedures may also include other methods of distribution that accrue to the benefit of the public via an award or prize.

6-13. *Wide Area Progressive Gaming Device Standards.*

- a. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed at or near the devices to which the jackpot applies.

- b. As applicable to participating gaming operations, the wide area progressive gaming device system shall be adequately restricted to prevent unauthorized access.
- c. The Gaming Commission shall approve procedures for the wide area progressive system that:
  - 1. Reconcile meters and jackpot payouts
  - 2. Collect/drop gaming device funds
  - 3. Verify jackpot, payment, and billing to gaming operations on pro-rata basis
  - 4. System maintenance
  - 5. System accuracy
  - 6. System security
- d. Reports, where applicable, adequately documenting the procedures required in [Section 6-12 \(c\)](#) shall be generated and retained.

6-14. *All Relevant Controls from [Section 8 – Information and Technology](#) will apply.*

6-15. *Drop and Count.* Standards for gaming devices drop and count are in [Section 10](#).

6-16. *Revenue Audit.* Standards for revenue audit of gaming devices are contained in [Section 18](#).

6-17. *Variance.* Refer to [Section 3-3](#).

### **Section 7. Cage, Vault, Kiosk, Cash and Cash Equivalents**

7-1. *Computer Applications.* Refer to [Section 3-6](#) for alternative computer application requirements.

7-2. *Supervision.* Refer to [Section 3-4](#).

7-3. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for check cashing; third-party check cashing; cashless systems; patron deposited funds; promotional payouts, drawing and giveaway prizes; cheque accountability; vouchers; cage and vault access; and any additional procedures required by this regulation or at the direction of the Gaming Commission.

7-4. *Personal Checks, Cashier's Checks, Traveler's Checks, Payroll Checks, and Counter Checks.*

- a. If personal checks, cashier's checks, traveler's checks, payroll checks, or counter checks are cashed at the cage, the gaming operation as approved by the Gaming Commission shall establish and comply with appropriate controls that, at a minimum, provide for security and integrity. For each check cashing transaction, the minimum controls shall include the following:
  - 1. Verification of patron identity
  - 2. Examine the check to ensure it includes the patron's name, current address, and signature

3. For personal checks, verify the patron's check cashing authority and record the source and results in accordance with approved procedures
  4. If a check guarantee service is used to guarantee the transaction and the procedures required by the check guarantee service are followed, then the above requirements do not apply.
- b. When counter checks are issued, the following must be included on the check:
    1. The patron's name and signature
    2. The dollar amount of the counter check
    3. Patron's bank name, bank routing number, and bank account numbers
    4. Date of issuance
    5. Signature of the employees approving the counter check transaction
  - c. Checks that are not deposited in the normal course of business, as established by management, (held checks) are subject to [Section 16](#).
  - d. When traveler's checks or other guaranteed drafts, such as cashier's checks, are presented, the cashier must comply with the examination and documentation procedures as required by the issuer.
  - e. If a third-party check cashing or guarantee service is used, the examination and documentation procedures required by the service provider apply, unless otherwise provided by tribal law or regulation.

7-5. *Cage and Vault Accountability.*

- a. All transactions that flow through the cage must be summarized for each shift and must be supported by documentation.
- b. Increases and decreases to the total cage inventory must be verified, supported by documentation, and recorded. Documentation must include the date and shift, the purpose of the increase/decrease, the employee(s) completing the transaction, and the person or department receiving the funds (for decreases only).
- c. The cage and vault inventories (including count rooms) must be counted independently by at least two (2) employees, attested to by signature, and recorded in ink or other permanent form at the end of each shift during which the activity took place. These two (2) employees must make individual counts to compare for accuracy and maintain individual accountability. All variances must be documented and investigated.
- d. The gaming operation must establish and comply with a minimum bankroll formula to ensure the gaming operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the gaming operation's patrons as they are incurred.

7-6. *Kiosks.*

- a. Kiosks must be maintained on the cage accountability and must be counted independently by at least two (2) employees, documented, and reconciled for each increase or decrease to the kiosk inventory.
- b. Each currency cassette must be counted and filled by one (1) employee, then independently verified by a second employee who did not participate in the initial process. Both employees must sign the cassette to confirm completion and verification.
- c. Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed inside a kiosk, must be stored in a secure area of the cage/vault.
- d. The gaming operation, subject to the approval of the Gaming Commission, must develop and implement physical security controls over the kiosks. Controls should address forced entry, evidence of any entry, and protection of circuit boards containing programs.
- e. Regarding cashless systems, the gaming operation, subject to the approval of the Gaming Commission, must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.
- f. The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted):
  1. Starting balance dollar amount per financial instrument
  2. Starting balance number of items per financial instrument
  3. Dollar amount per financial instrument issued
  4. Number of items per financial instrument issued
  5. Dollar amount per financial instrument issued
  6. Number of items per financial instrument redeemed
  7. Dollar amount per financial instrument increases
  8. Number of items per financial instrument increases
  9. Dollar amount per financial instrument decreases
  10. Number of items per financial instrument decreases
  11. Ending balance dollar amount per financial instrument
  12. Ending balance number of items per financial instrument

7-7. *Patron Deposited Funds.* If a gaming operation allows patrons to deposit funds at the cage, and those funds are later transferred to a gaming area for wagering, the following standards apply:

- a. The receipt or withdrawal of a patron deposit must be documented, with a copy given to the patron and a copy remaining in the cage.

- b. Both copies of the document of receipt or withdrawal must contain the following information:
    - 1. Same receipt number on each copy
    - 2. Patron's name and signature
    - 3. Date of receipt and withdrawal
    - 4. Dollar amount of deposit or withdrawal
    - 5. Nature of deposit or withdrawal
    - 6. Name and signature of the employee who conducted the transaction
  - c. Procedures must be established and complied with for front money deposits to:
    - 1. Maintain a detailed record by patron name and date of all funds on deposit
    - 2. Maintain a current balance of all patron deposits that are in the cage/vault inventory or accountability
    - 3. Reconcile the current balance with the deposits and withdrawals at least daily
- 7-8. *Promotional Payments, Drawings, and Giveaway Programs.* The following procedures must apply to any payment resulting from a promotional payment, drawing, or giveaway program disbursed by the cage or any other department. This section does not apply to payouts for table game promotional pots and/or pools.
- a. All payments must be documented to support the cage accountability.
  - b. Payments above \$2,000.00 must be documented at the time of the payment, and documentation must include the following:
    - 1. Date and time
    - 2. Dollar amount of payment or description of personal property
    - 3. Reason for payment
    - 4. Patron's name and confirmation that identity was verified (drawings only)
    - 5. Signature(s) of at least two (2) employees verifying, authorizing, and completing the promotional payment with the patron. For computerized systems that validate and print the dollar amount of the payment on a computer-generated form, only one (1) signature is required.
    - 6. The required documentation may be prepared by employees who are not in the cage if the required signatures are those of the employees completing the payment with the patron.

- c. For payments that are less than \$100.00, documentation shall be produced to support the cage accountability. Such documentation may consist of a line item on a cage accountability document (e.g., “25 - \$10.00 cash giveaway coupons = \$250.00).
- 7-9. Controls must be established, and procedures implemented to ensure accountability of cheque inventory. Such controls must include, but are not limited to, the following:
- a. Purchase
  - b. Receipt
  - c. Inventory
  - d. Storage
  - e. Destruction
- 7-10. *Vouchers.*
- a. Controls must be established, and procedures implemented to:
    - 1. Verify the authenticity of each voucher redeemed
    - 2. If the voucher is valid, verify that the patron is paid the appropriate amount
    - 3. Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher
    - 4. Retain payment documentation for reconciliation purposes
    - 5. For manual payment of a voucher in an amount established by management and approved by the Gaming Commission, a supervisory employee is required to verify the validity of the voucher prior to payment.
  - b. Vouchers paid during a period while the voucher system is temporarily out of operation must be marked “paid” by the cashier.
  - c. Vouchers being redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system.
  - d. Paid vouchers must be maintained in the cashier's accountability for reconciliation purposes.
  - e. Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The Accounting/Revenue Audit Department will maintain the voided voucher, if available.
- 7-11. *Cage and Vault Access.* Controls must be established, and procedures implemented to:
- a. Restrict physical access to cage/vault employees, designated employees, and other authorized persons

- b. Limit transportation of extraneous items such as personal belongings, toolboxes, beverage containers, etc., in and out of the cage and vault

7-12. *Variances.* Refer to Section 3-3.

## **Section 8. Information Technology**

8-1. The Little River Band of Ottawa Indians Gaming Commission adopts the [GLI-GSF](#) which utilizes CIS-CSC. The Little River Casino Resort is identified as a Gaming Implementation Group level 3 (GIG3).

8-2. *Compliance.*

- a. The gaming operation must implement and comply with all modules of the GLI-GSF.
- b. The gaming operation must develop and implement procedures based on the requirements of the GLI-GSF modules. These procedures must be approved by the Gaming Commission.
- c. As annual audit(s) or assessment(s) in accordance with the GLI-GSF modules is required, with a copy of these report(s) delivered to the Gaming Commission no less than forty-eight (48) hours after issuance.
- d. Copies of all remediation plans and/or follow-up reports shall be delivered to the Gaming Commission no less than forty-eight (48) hours after issuance.

## **Section 9. Controlled Keys**

9-1. *Supervision.* Refer to [Section 3-4](#).

9-2. *Custody of Controlled Keys.*

- a. Custody of release, content, storage cart, or gaming device CPU keys shall require the involvement of a department independent of the Count Service Team as well as employees from the department(s) requesting access.
- b. Surveillance monitoring key access does not satisfy the requirements in this part for physical involvement.

9-3. *Procedures Required.*

- a. Gaming Commission approved controls and procedures shall be established and implemented to safeguard the use, access, and security of keys in accordance with the following:
  - 1. Each of the following requires a separate and unique key lock or alternative secure access method:
    - A. Drop box release
    - B. Drop box content
    - C. Bill/Ticket acceptor canister release

- D. Bill/Ticket acceptor canister content
  - E. Count room keys
  - F. Storage carts
  - G. Kiosk release
  - H. Kiosk contents
  - I. Gaming device CPU
- b. Access to and return of keys or equivalents must be documented with the date, time, and signature or other unique identifier of the employee accessing or returning the key(s).
    - 1. At least three (3) Count Services Team Members are required to be present to access and return release, content, or storage cart keys.
    - 2. At least three (3) Count Services Team Members are required to be present at the time count keys are issued for the count.
  - c. Documentation of all keys, including duplicates, must be maintained, including:
    - 1. Unique identifier for each individual key
    - 2. Key storage location
    - 3. Number of keys made, duplicated, and destroyed
    - 4. Authorization and access
  - d. Other than the Count Services Team, no employee may have access to the drop box content keys while in possession of storage rack keys and/or release keys.
  - e. Other than the Count Services Team, only employees authorized to remove drop boxes are allowed access to drop box release keys.
  - f. Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.
  - g. Emergency manual keys, such as an override key, for computerized, electronic, and alternative key systems must be maintained in accordance with the following:
    - 1. Access to the emergency manual key(s) used to access the box containing the patron interface drop and count keys requires the physical involvement of at least three (3) employees from separate departments, including management. The date, time, and reason for access must be documented with the signatures of all participating persons signing out/in the emergency manual key(s).
    - 2. The custody of the emergency manual keys requires the presence of two (2) employees from separate departments from the time of their issuance until the time of their return.

3. Routine physical maintenance that requires access to the emergency manual key(s) and does not involve accessing the gaming device drop and count keys, requires the presence of two (2) employees from separate departments. The date, time, and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

9-4. *Computerized Key Systems.*

- a. Computerized key systems which restrict access to controlled keys using passwords, keys or other means, other than a key custodian, require Gaming Commission approved procedures to safeguard the use, access, and security of controlled keys.
- b. For computerized key systems, the following additional key control procedures apply:
  1. Information Technology management employees assign and control user access to keys in the computerized key systems to ensure that controlled keys are restricted to authorized employees.
  2. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a. override key) is used to access the box containing controlled keys, requires the physical involvement of at least three (3) employees from separate departments, including management. The date, time, and reason for access shall be documented with the signatures of all participating employees signing out/in the emergency manual key(s).
  3. The custody of the keys issued pursuant to [Section 9-4 \(b\) \(2\)](#) requires the presence of two (2) employees from separate departments from the time of their issuance until the time of their return.
  4. Routine physical maintenance that requires accessing the emergency manual override key and does not involve the accessing of the drop and count keys requires the presence of two (2) employees from separate departments. The date, time, and reason for access shall be documented with the signatures of all participating employees signing out/in the emergency manual key(s).

**Section 10. Drop and Count**

10-1. *Supervision.* Refer to [Section 3-4](#).

10-2. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for the following: count room access; security of count process; table games, gaming devices, and kiosk drop processes; table games, gaming devices, and kiosk count processes; fill of kiosk cassettes; simultaneous counts from different revenue centers; and any additional procedures required by this regulation or at the direction of the Gaming Commission.

10-3. *Count Room Access.* Controls must be established, and procedures implemented to limit physical access to the count room to the Count Services Team, designated employees, and other

authorized persons. Such controls and procedures must include the following, and be approved by the Gaming Commission:

- a. Count Services Team Members may not exit or enter the count room during the count except for emergencies or scheduled breaks.
- b. Surveillance must be notified whenever a Count Service Team Member exits or enters the count room during the count.
- c. The approved Count Services Department Procedures, at a minimum, must address the transportation of extraneous items such as personal belongings, toolboxes, beverage containers, etc., in and/or out of the count room.

10-4. *Count Services Team.* Controls must be established, and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls and procedures must include the following, and be approved by the Gaming Commission:

- a. All counts must be performed by at least three (3) Count Services Team Members.
- b. At no time during the count can there be fewer than three (3) Count Services Team Members in the count room until the drop proceeds have been accepted into cage/vault accountability.
- c. Count Services Team Members must be rotated on a routine basis such that the team is not consistently the same three (3) employees, more than four (4) days per week. This standard does not apply to gaming operations that utilize a team of more than three (3) employees.
- d. Functions performed by the Count Services Team must be rotated on a routine basis.
- e. Count Services Team Members must be independent of the transactions being counted and reviewed. A cage/vault employee may be used if they are not the sole recorder of the count and do not participate in the transfer of drop proceeds to the cage/vault. Accounting/Revenue Audit employees may be used if there is an independent audit of all count documentation.

10-5. *Table Game Drop Standards.* Controls must be established, and procedures implemented to ensure security of the drop process. Such controls and procedures must include the following, and be approved by the Gaming Commission:

- a. Surveillance must be notified when the drop begins.
- b. The setting out of empty table game drop boxes and the drop shall be a continuous process. The drop begins with the removal of the first table game drop box; however,

empty drop boxes are not required to be placed on tables that are inactive at the time of the drop.

- c. At least two (2) employees must be involved in the removal of the drop box, at least one of whom is independent of the Table Games Department.
- d. Once the drop is started, it must continue until it is finished.
- e. All drop boxes may be removed only at the time previously designated by the gaming operation and reported to the Gaming Commission. If an emergency drop is required, Surveillance must be notified before the drop is conducted and the Gaming Commission must be informed within a timeframe approved by the Gaming Commission.
- f. All locked table game drop boxes must be removed from the tables by an employee independent of the table game shift being dropped.
- g. For any tables that open during the shift, a separate drop box must be placed on each table, or a gaming operation may utilize a single drop box with separate openings and compartments for each shift.
- h. Table game drop boxes must be transported directly to the count room or other equivalently secure area by a minimum of two (2) employees, at least one (1) of whom is independent of the Table Game Department, until the count takes place.
- i. All tables that were not open during a shift and therefore not part of the drop must be documented.
- j. All table game drop boxes must be posted with a number corresponding to a permanent number on the gaming table and marked to indicate game, table number, and shift, if applicable.

10-6. *Gaming Device and Financial Instrument Storage Component Drop Standards.* Controls must be established, and procedures implemented to ensure security of the drop process. Such controls and procedures must include the following, and be approved by the Gaming Commission:

- a. Surveillance must be notified when the drop is to begin. The drop begins when the first bill/ticket acceptor box is removed.
- b. At least two (2) employees must be involved in the removal of the gaming device and financial instrument storage component drop, at least one (1) employee of whom is independent of the Slot Operations Department.
- c. All financial instrument storage components may be removed only at the time previously designated by the gaming operation and reported to the Gaming Commission.

If an emergency drop is required, surveillance must be notified before the drop is conducted and the Gaming Commission must be informed within a time frame approved by the Gaming Commission.

1. Any changes to the drop route(s) shall be sent to the Surveillance Manager for review and approval. The Surveillance Manager will have forty-eight (48) hours to approve the request or propose alternatives.
  2. Proposed changes to the drop route(s) cannot be implemented without the endorsement of the Surveillance Manager or Executive Director of the Gaming Commission.
- d. The financial instrument storage components must be removed by an employee independent of the Slot Operations Department, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
1. Security must be provided for the financial instrument storage components removed from gaming devices and awaiting transport to the count room.
  2. Transportation of financial instrument storage components must be performed by a minimum of two (2) employees, at least one (1) of whom is independent of the Slot Operations Department.
- e. All financial instrument storage components must be posted with a number corresponding to a permanent number on the gaming device.

10-7. *Table Game Count Standards.*

- a. Access to stored, full table game drop boxes must be restricted to:
  1. Authorized members of the Count Services Team
  2. In an emergency, authorized persons for the resolution of a problem
- b. The table games count must be performed in the count room or other equivalently secure area with comparable controls.
- c. Access to the count room during the count must be restricted to the Count Services Team, except for authorized observers, supervisors for resolution of problems, and authorized maintenance employees.
- d. If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers.

- e. Count equipment and systems must be tested, with the results documented, before the first count begins, to ensure the accuracy of the equipment.
- f. The table game drop boxes must be individually emptied and counted to prevent the commingling of funds between boxes until the count of the box has been recorded.
  - 1. The count of each box must be recorded in ink or other permanent form of recordation.
  - 2. For counts that do not utilize a currency counter, a second count must be performed by a Count Services Team Member who did not perform the initial count. Separate counts of cheques must always be performed by Count Service Team Members.
  - 3. Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the Count Services Team Members or Accounting/Revenue Audit employees. All single-use coupons must be cancelled daily by an authorized employee to prevent improper recirculation.
  - 4. If a currency counter interface is used:
    - A. It must be adequately restricted to prevent unauthorized access.
    - B. The currency drop figures must be transferred via direct communications line or computer storage media to Accounting/Revenue Audit.
- g. If currency counters are utilized, a Count Services Team Member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- h. Two (2) counts of the currency rejected by the currency counter must be recorded per table, as well as in total. Posting rejected currency to a nonexistent table is prohibited.
- i. Table game drop boxes, when empty, must be shown to another member of the Count Services Team, to another employee observing the count, provided that the count is monitored in its entirety by an employee independent of the count.
  - 1. Orders for fill/credit, if applicable, shall be matched to the fill/credit slips. Fills and credits shall be traced to or recorded on the count sheet.
  - 2. Pit marker issue and payment slips, if applicable, removed from the table game drop boxes shall either be:

- A. Traced to or recorded on the count sheet by Count Services Team Member; or
  - B. Totaled by shift and traced to the totals documented by the computerized system.
- 3. Accounting/Revenue Audit employees shall verify the issue/payment slip for each table is accurate.
- 4. The opening/closing table inventory forms, if applicable, shall either be:
  - A. Examined and traced to or recorded on the count sheet; or
  - B. If a computerized system is used, Accounting/Revenue Audit employees can trace the opening/closing table inventory forms to the count sheet. Discrepancies shall be investigated with the findings documented and maintained for inspection.
- j. Gaming Commission approved procedures must be implemented to ensure that any corrections to the count documentation are permanent and identifiable, and that the original, corrected information remains legible. Corrections must be verified by two (2) members of the Count Services Team.
- k. The count sheet must be reconciled to the total drop by a Count Services Team Member who may not function as the sole recorder, and variances must be reconciled and documented.
- l. All Count Services Team Members must sign the count sheet attesting to their participation in the count.
- m. A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two (2) employees, one (1) of whom is a supervisory Count Services Team Member, and the other a Count Services Team Member.
  - 1. Final verification must include a comparison of currency counted totals against the currency counter/system report, if any counter/system is used.
  - 2. Any unresolved variances must be documented, and the documentation must remain part of the final count record forwarded to Accounting/Revenue Audit.
  - 3. This verification does not require a complete recount of the drop proceeds but does require a review sufficient to verify the total drop proceeds being transferred.
  - 4. The two (2) employees must sign the report attesting to the accuracy of the total drop proceeds verified.

5. All drop proceeds and cash equivalents that were counted must be submitted to the cage or vault employee (who must be independent of the Count Services Team), or to an employee independent of the revenue generation source and the count process, for verification. The employee must certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting/revenue audit.
- n. After verification by the employee receiving the funds, the drop proceeds must be transferred to the cage/vault.
    1. The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
    2. The cage/vault employee must not have knowledge or record of the drop proceeds total before it is verified.
    3. All count records must be forwarded to Accounting/Revenue Audit or secured and accessible only by designated Accounting/Revenue Audit employees.
    4. The cage/vault employee receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.
    5. Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.
  - o. The count sheet, with all supporting documents, must be delivered to the accounting department by a Count Services Team Member or an employee independent of the cage/vault. Alternatively, it may be secured so that it is only accessible only by Accounting/Revenue Audit.

10-8. *Gaming Device Financial Instrument Count Standards.*

- a. Access to stored full financial instrument storage components must be restricted to:
  1. Authorized members of the Count Services Team
  2. In an emergency, authorized persons for the resolution of a problem
- b. The gaming device financial instrument count must be performed in the count room or other equivalently secure area with comparable controls.
- c. Access to the count room during the count must be restricted to members of the Count Services Team, except for authorized observers, supervisors for resolution of problems, and authorized maintenance employees.

- d. If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from different revenue centers.
- e. The Count Services Team must not have access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability.
- f. Count equipment and systems must be tested, and the results documented, before the first count begins, to ensure the accuracy of the equipment.
- g. If a currency counter interface is used:
  - 1. It must be adequately restricted to prevent unauthorized access
  - 2. The currency drop figures must be transferred via direct communications line or computer storage media to Accounting/Revenue Audit
- h. The financial instrument storage components must be individually emptied and counted to prevent the commingling of funds between storage components until the count of the storage component has been recorded.
  - 1. The count of each storage component must be recorded in ink or other permanent form of recordation.
  - 2. Coupons or other promotional items not included in gross revenue may be recorded on a supplemental document by the Count Services Team or Accounting/Revenue Audit employee. All single-use coupons must be cancelled daily by an authorized employee to prevent improper recirculation.
- i. If currency counters are utilized, a Count Services Team Member must observe the loading and unloading of all currency at the currency counter, including rejected currency.
- j. Two (2) counts of the currency rejected by the currency counter must be recorded per interface terminal as well as in total. Rejected currency must be posted to the gaming machine from which it was collected.
- k. Storage components, when empty, must be shown to another member of the Count Services Team or to another employee observing the count, provided that the count is monitored in its entirety by Surveillance.
- l. Gaming Commission approved procedures must be implemented to ensure that any corrections to the count documentation are permanent, identifiable and the original, corrected information remains legible. Corrections must be verified by two (2) Count Services Team Members.
- m. The count sheet must be reconciled to the total drop by a Count Services Team Member who may not function as the sole recorder, and variances must be reconciled and

documented. This standard does not apply to vouchers removed from the financial instrument storage components.

- n. All Count Services Team Members must sign the report attesting to their participation in the count.
- o. A final verification of the total drop proceeds, before transferring to cage/vault, must be performed by at least two (2) employees, one (1) of whom is a supervisory Count Services Team Member and the other a Count Services Team Member.
  - 1. Final verification must include a comparison of currency counted totals against the currency counter/system report, if a counter/system is used.
  - 2. Any unresolved variances must be documented, and the documentation must remain a part of the final count record forwarded to Accounting/Revenue Audit.
  - 3. This verification does not require a complete recount of the drop proceeds but does require a review sufficient to verify the total drop proceeds being transferred.
  - 4. The two (2) employees must sign the report attesting to the accuracy of the total drop proceeds verified.
  - 5. All drop proceeds and cash equivalents that were counted must be turned over to the cage/vault (who must be independent of the Count Services Team) or to an employee independent of the revenue generation and the count process for verification. Such cashier or employee must certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by Accounting/Revenue Audit.
- p. After certification by the employee receiving the funds, the drop proceeds must be transferred to the cage/vault.
  - 1. The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
  - 2. The cage/vault employee must not have knowledge or record of the drop proceeds total before it is verified.
  - 3. All count records must be forwarded to Accounting/Revenue Audit secured and accessible only by designated Accounting/Revenue Audit employees.
  - 4. The cage/vault employee receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assuming accountability of the drop proceeds, and ending the count.
  - 5. Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.

- q. The count sheet, with all supporting documents, must be delivered to Accounting/Revenue Audit by a Count Services Team Member or employee independent of the cage/vault. Alternatively, it may be adequately secured and accessible only by Accounting/Revenue Audit.

10-9. *Collecting Currency Cassettes and Financial Instrument Storage Components from Kiosks.* Controls must be established, and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls and procedures must include the following, and be approved by the Gaming Commission:

- a. Surveillance must be notified prior to the financial instrument storage components or currency cassettes being accessed in a kiosk.
- b. At least two (2) employees must be involved in the collection of currency cassettes and/or financial instrument storage components from kiosks and at least one (1) employee should be independent of kiosk accountability.
- c. Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized employees.
- d. Redeemed vouchers collected from the kiosk must be secured and delivered to the appropriate department (cage or Accounting/Revenue Audit) for reconciliation.
- e. Gaming Commission approved controls and procedures must be established and implemented to ensure that the currency cassettes distribute the appropriate denominations.

10-10. *Kiosk Count Standards.*

- a. Access to stored full kiosk financial instrument storage components and currency cassettes must be restricted to:
  - 1. Authorized employees
  - 2. In an emergency, authorized persons for the resolution of a problem
- b. The kiosk count must be performed in a secure area, such as the cage or count room.
- c. If counts from various revenue centers and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue centers.
- d. The kiosk financial instrument storage components and currency cassettes must be individually emptied and counted to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded.
  - 1. The count of kiosk financial instrument storage components and currency cassettes must be recorded in ink or other permanent form of recordation.

2. Coupons or other promotional items not included in gross revenue (if any) may be recorded on a supplemental document. All single-use coupons must be cancelled daily by an authorized employee to prevent improper recirculation.
- e. Gaming Commission approved procedures must be implemented to ensure that any corrections to the count documentation are permanent, identifiable, and the original, corrected information remains legible. Corrections must be verified by two (2) employees.

10-11. *Variances*. Refer to [Section 3-3](#).

## **Section 11. Patron Tracking Systems**

11-1. *Patron Tracking System*. The following standards apply if a patron tracking system is utilized:

- a. The patron tracking system shall be secured to prevent unauthorized access.
- b. Changes to individual patron tracking accounts other than through an automated process related to actual play must be sufficiently documented (including substantiation of reasons for increases) and authorized or performed by supervisory employees. An addition, deletion, or change to individual patron tracking accounts must be authorized by supervisory employees and documented and randomly verified by Accounting/Revenue Audit on a quarterly basis.
  1. The addition/deletion of points to patron tracking accounts authorized by supervisors shall be documented and randomly verified by the department on at least a quarterly basis.
  2. The above requirements do not apply to the deletion of points related to inactive or closed accounts through an automated process.
- c. Patron's Club employees who redeem points for patrons shall be allowed to receive lost patron club cards, if they are immediately deposited into a secured container for retrieval by independent employee(s).
- d. All other changes to the patron tracking system shall be appropriately documented.
- e. Employees who redeem points for patrons shall not have access to inactive or close accounts without a supervisor's authorization. Documentation of such access and approval shall be created and maintained.
- f. Patron identification shall be required when redeeming points for cash or at any time points are being redeemed without a patron tracking card.
- g. Rules and policies for patron tracking accounts including the awarding, redeeming, and expiration of points shall be prominently displayed or available for patron review at the gaming operation.

## **Section 12. Complimentary Services or Items**

12-1. *Supervision*. Refer to [Section 3-4](#).

Chapter 11: Class III Tribal Minimum Internal Control Standards

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- 12-2. *Complimentary Services or Items.* The gaming operations shall establish, and the Gaming Commission shall approve procedures for complimentary services or items that address the following:
- a. Specific job titles are authorized to approve or issue complimentary services or items, including levels of authorization.
  - b. Limits and conditions on the approval and issuance of complimentary services or items.
  - c. Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items.
  - d. Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts.
    1. Records must include the following for all complimentary items and services equal to or exceeding the amount established by the gaming operation and approved by the Gaming Commission:
      - A. Name of patron who received the complimentary service or item
      - B. Name(s) of issuer(s) of the complimentary service or item
      - C. The actual cash value of the complimentary service or item
      - D. The type of complimentary service or item
      - E. Date the complimentary service or item was issued
- 12-3. *Records/Documentation.* Detailed complimentary services and items records must be summarized and reviewed by management for proper authorization and compliance.
- a. A detailed report on complimentary services or item transactions that meet an established threshold approved by the Gaming Commission must be prepared monthly.
  - b. The detailed report shall be forwarded to management for review.
- 12-4. *Variances.* Refer to [Section 3-3](#).

### **Section 13. Cashless Wagering Systems and Patron Accounts**

- 13-1. *Cashless Systems.*
- a. Cashless wagering systems (CWS), as applicable, must meet the technical requirements outlined in the Gaming Commission Regulation – [Chapter 2](#).
  - b. CWS systems in use at a gaming operation shall perform the following minimum functions:
    1. Prohibit monetary transfers between patron accounts
    2. Ensure all patron accounts are solely owned and accessed by one (1) account number and one (1) unique identifier per patron

3. Prohibit the ability to place a wager directly at any game or gaming device by means of an external electronic funds transfer (EFT) using a credit card or other external debit instrument
  4. The ability to establish a maximum wager account balance
  5. Establish a maximum number of attempts a patron is permitted to enter to determine a successful confirmation
- c. Approved departmental procedures shall be established for the following:
1. The protection and storing of Personal Identifiable Information (PII)
  2. For fraudulent accounts, suspicious conduct, flagging of lost or stolen patron's cards, and the prevention of unauthorized use
  3. Risk management framework, including access controls, segregation of duties, description of all software applications that comprise the cashless system, and a description of all integrated third-party service providers
  4. Anti-Money laundering monitoring
  5. Protection of patrons' funds
- d. The gaming operation shall establish detailed procedures for testing PAT, CEP, and NCEP balances pertaining to each respective cashless wagering module. These procedures must be included in the approved departmental procedures.
- e. Patrons shall be able to identify each cashless gaming device, by any means left to the discretion of the gaming operation. (i.e., remove display menu items that pertain to cashless functionality for devices that do not participate, a host message indicating cashless capabilities, use of stickers or signage indicating participation or non-participation).
- f. The cashless system shall perform a control program self-verification or integrity check at least once every twenty-four (24) hours. Results of the self-verification or integrity check shall be logged and maintained for at least one (1) year. The failure of the self-verification or integrity check shall result in the immediate notification of the General Manager, Director of Finance, Director of IT, Director of Compliance, and the Gaming Commission.
- g. The gaming operation shall provide, as part of submitted procedures, the calculation used for computing the adjusted gross revenue that factors in the cashless transactions (i.e., PAT In, PAT Out, CEP In, CEP Out, NCEP In, and NCEP Out).

13-2. *Patron Accounts.*

- a. Patron accounts must be established, maintained, and accounted for at one designated area (e.g., main cage). Further, all subsequent deposits, withdrawals, or adjustments must be accounted for through the same designated area.

- b. The patron shall appear at the gaming operation in person at a designated area of accountability.
- c. To establish a patron account, gaming operations will develop, and the Gaming Commission shall approve procedures that include the examination, verification, and recording the following minimum information:
  - 1. Type, number, and expiration date of valid government issued picture identification
  - 2. The patron's name
  - 3. The patron's physical address
  - 4. The patron's date of birth
  - 5. The patron's account number
  - 6. Date the account was opened
  - 7. The employee's name recording the information
  - 8. Verify that the patron is not on any exclusion or self-exclusion list of any Little River Band of Ottawa Indians gaming operation.
  - 9. The patron's signature attesting to the following:
    - A. The information provided by the patron to the gaming operation to open the patron account is accurate.
    - B. The patron has reviewed and acknowledged the rules and procedures established by the gaming operation for use of the patron account.
    - C. The patron has been informed of and acknowledged that they are prohibited from allowing any other person not assigned to the patron account access to or use of their patron account.
    - D. The patron consents to the monitoring and recording by the gaming operation and the Gaming Commission of the use of the patron account.
    - E. The patron account has not been created using an anonymous or fictitious name.
    - F. The employee or the cashless system shall provide the patron account holder with a secure method of access.
- d. Acceptance of privacy policy conditions. The privacy policy shall include, at a minimum, the following:

1. The Personal Identifiable Information (PII) required to be collected.
  2. The purpose and legal basis for PII collection and every processing activity for which consent is being sought.
  3. The period in which the PII is stored or, if no period can be possibly set, the criteria used to set this.
  4. The conditions under which PII may be disclosed.
  5. An affirmation that measures are in place to prevent unauthorized or unnecessary disclosure of the PII.
  6. The identity and contact details for the gaming operation are seeking the consent, including any third-party service providers which may access and/or use this PII.
  7. The rights and possibility of a patron filing a complaint with the Gaming Commission.
  8. For PII collected directly from the patron, whether there is legal or contractual obligation to provide PII and the consequences of not providing that PII.
  9. The privacy policy shall be available via external signage, forms, or brochures available at the gaming operation.
- e. The patron shall sign the account documentation/application before the employee will activate the account:
  - f. For each patron account, a list is maintained of each person assigned to the account and must include the date each person is added or removed from the account.
  - g. Suspended patron accounts will only be reactivated after re-verifying information required in [Section 13-2 \(c\)](#). Re-verification requires approval by a supervisor or above and must be documented and maintained.
  - h. Smart cards cannot maintain the only source of account data.
  - i. The establishment of a patron account must include developed terms and conditions that shall be accepted by the patron. The terms and conditions must include vital information or disclosure, such as:
    1. Security of authentication credentials
    2. Password protocols (i.e., lost or changes)
    3. Conditions for when an account will be declared inactive and what will happen to that account
    4. What happens if a wager is interrupted during play

5. Timeframe and limits on withdrawals and deposits
6. Rights of the gaming operation
- j. Departmental procedures shall be established to provide a secure method for each patron to access funds in a patron account.
- k. A record of each deposit, withdrawal, or adjustment is created and maintained that details the following information:
  1. Patron's name, patron account number, and signature or verification of secure patron identification (except adjustments to the patron account do not require the patron's signature or verification of secure patron identification).
  2. Date and time of deposit, withdrawal, or account adjustment
  3. Dollar amount of deposit, withdrawal, or account adjustment
  4. Nature of deposit or withdrawal
  5. Reason for adjustment to patron account, if applicable
  6. The information about deposits or withdrawals above should be included on the receipt as follows:
    - A. A manual deposit or withdrawal is evidenced by at least a two-part document, with one (1) part remaining in the cashier's area and the other part given to the patron. In addition, the document must include the same document number on all copies and the signature of the employee handling the transaction; or
    - B. A computerized depositor withdrawal is evidenced through an electronic receipt which is to be provided to the patron.
- l. Departmental procedures shall be approved and implemented to ensure that funds withdrawn by a patron from a patron account are not transferred to any other account.
- m. Adjustments to patron accounts must be documented and authorized by management with such authority as delineated within the approved departmental procedures.
- n. Departmental procedures for the disposition of patron account balances in the event of the death of the patron, which may include the opportunity for the patron to identify a Pay Upon Death designee.
- o. For promotional credits or bonus credits, determine how such credits are identified within the patron account and delineate this information in the approved department procedures.
- p. A detailed report for each patron account is created on demand and is made available to the patron upon request, which includes:

1. Account number
2. Name of all patrons registered to the account
3. Beginning balance
4. List of all transactions which includes the following:
  - A. Date and time
  - B. Amount of transaction
  - C. Transaction type (i.e., deposit, withdrawal, etc.)
  - D. Gaming area, if applicable
  - E. Patron(s) and employee(s) who initiated and authorized the transaction
  - F. Totaled by credits and by debits
  - G. Ending balance
- q. If online access is provided for patrons to view their account balances or transaction history from the cashless system, physical or logical restrictions shall exist to provide independent operation from the cashless system.

13-3. *Patron Deposits, Withdrawals, and Adjustments.*

- a. Prior to the patron making a deposit or withdrawal from a patron account, the employee or cashless system shall verify the patron account, the patron identity, and availability of funds. A PIN or biometric is an acceptable form of verifying identification.
- b. Adjustments made to the patron accounts shall be performed by a supervisor or above.
- c. When a deposit, withdrawal, or adjustment is processed by an employee, a transaction record shall be created containing the following information:
  1. Same document number on all copies
  2. Type of transaction (deposit, withdrawal, or adjustment)
  3. Name or other identifier of the patron
  4. The unique account identifier
  5. Patron signature for withdrawals, unless a secured method of access is utilized
  6. For adjustments to the account, the reason for the adjustment
  7. Date and time of transaction
  8. Amount of transaction
  9. Nature of deposit, withdrawal, or adjustment (i.e., cash, check, cheques)

10. Signature of the employee processing the transaction
- d. When a patron deposits or withdraws funds from a patron account electronically, the following shall be recorded:
  1. Date and time of transaction
  2. Location (i.e., kiosk)
  3. Type of transaction (i.e., deposit, withdrawal)
  4. Amount of transaction
  5. The unique account identifier
- e. Patron account transaction records shall be available to the patron upon reasonable request.
- f. If electronic funds transfers involving patron account funds are processed through the gaming operation bank account, that account must be exclusively dedicated to patron transactions and cannot be used for any other purpose.

#### **Section 14, Gaming Promotions, Promotional Drawings, Tournaments, Coupons and Direct Mailings for Non-Integrated Systems**

14-1. *Supervision.* Refer to [Section 3-4](#).

14-2. *Procedures Required.* The gaming operation, subject to Gaming Commission approval, shall develop and implement procedures for the following: Conducting of promotions, promotional drawings, and tournaments; use and protection of promotional gaming equipment (i.e., cash cube); coupons; direct mailings; and any additional procedures required by this regulation or at the direction of the Gaming Commission.

14-3. *Gaming Promotions, Promotional Drawings, and Tournaments.* The gaming operation shall establish, and the Gaming Commission shall approve procedures for conducting promotions, promotional drawings, and tournaments. These procedures shall include, at a minimum:

- a. The rules of play
- b. Any restrictions or limitations on participant eligibility, including any related to the claim of prizes or cash awards
- c. Entrance requirements (i.e., points, Patron's Club membership, etc.)
- d. Selection process (assurance of randomness)
- e. Date, time, and location requirements

- f. Accounting requirements, as applicable
  - g. Documentation and retention of documents
  - h. Adjustments to patron account(s)
  - i. Rules governing promotions offered across multiple gaming operations, third-party sponsored promotions, and joint promotions involving third parties
- 14-4. *Submission to Gaming Commission.* Individual profiles for promotions, promotional drawings, and tournaments shall be submitted to the Gaming Commission for review a minimum of fifteen (15) calendar days prior to the event. Submissions shall include:
- a. Promotional profile(s) with all pertinent information (refer to [Section 14-3](#))
  - b. Checklists used by the gaming operations to verify the accuracy of the profile built into the marketing system
  - c. Signature of at least two (2) verifiers attesting to the accuracy of the profile module
  - d. Requirement for the posting of written rules for transparency and that verbal rules are unacceptable
  - e. Procedures for the use and protection of promotional gaming devices and equipment (i.e. roller drum, cash cube)
  - f. Any changes to or cancellation of a submission shall require a re-submission or notification of at least twenty-four (24) hours prior to the start of the event.
- 14-5. *Patron Tracking Systems and Gaming Promotions.*
- a. Changes to the patron tracking systems, promotion and external bonusing system parameters—which control features such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, coupons and vouchers, must be documented and performed under the authority of supervisory employees independent of the department initiating the change. Alternatively, the changes shall be made by supervisory employees of the department initiating the change if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory employees independent of the department initiating the change monthly.
  - b. All other changes to the patron tracking system shall be appropriately documented as required in [Section 11](#).
- 14-6. *Coupons.*
- a. The gaming operation shall establish, and the Gaming Commission shall approve procedures for coupons including.
    - 1. Issuance
    - 2. Redemption

3. Expiration
4. Physical controls (including procedures for unused and expired coupons)
5. Prior to distribution, any coupons that are printed by an external vendor shall be reviewed by designated employees and approved by the General Manager. Any errors or discrepancies found after distribution shall be brought to the immediate attention of the General Manager and Director of Gaming and Marketing for resolution.

14-7. *Direct Mailings.*

- a. The gaming operation shall establish, and the Gaming Commission shall approve procedures for the direct mailing of complimentary and coupon offers to patrons. These procedures shall include:
  1. Eligibility
  2. Reviewed by designated employees and approved by the General Manager. Any errors or discrepancies found after distribution shall be brought to the immediate attention of the General Manager and Director of Gaming and Marketing
  3. Offer specifications (i.e., free play, entertainment, dinner, hotel, expiration, etc.)
  4. Security of mailing lists
  5. Outside vendors adherence to procedures

**Section 15. Marketing, Gaming Promotions, Promotional Drawings, and Tournaments for Integrated Cashless Wagering Systems**

15-1. *Supervision.* Refer to [Section 3-4](#).

**\*Note: “Promotion”, “Promotional award” or “Bonus” as used in this section means cashless credits based on predefined criteria outlined by the rules of the promotion.**

15-2. *Database Required.* The gaming operation must establish a database to track all promotions by patron including amount, type of promotion, date issued, start date, and expiration date of the promotion. The database must also track redemptions by patron including date, time, and location of the redemption. The gaming operation must specify the period for which all transactions will be maintained in the CWS, which must be for a period of not less than ninety (90) days from the date of the transaction provided that any such records removed from the system after ninety (90) days must be stored and accessible for audit purposes.

15-3 *Gaming Promotions, Promotional Drawings and Tournaments.* The gaming operation shall establish, and the Gaming Commission shall approve procedures for the conducting of cashless promotions, promotional drawings, and tournaments. These procedures shall include, at a minimum:

- a. The rules of play

- b. Any restrictions or limitations on participant eligibility, including any related to the claim of prizes or awards
  - c. Entrance requirements (i.e., points, Patron's Club membership, etc.)
  - d. Selection process (assurance of randomness)
  - e. Date, time, and location requirements
  - f. Accounting requirements, as applicable
  - g. Documentation and retention of documents
  - h. Segregation of duties, employees that can issue a promotion cannot open/activate a patron account
  - i. Rules governing promotions offered across multiple gaming operations, third-party sponsored promotions, and joint promotions involving third parties
- 15-4. *Submission to Gaming Commission.* Individual profiles for cashless promotions, promotional drawings, and tournaments shall be submitted for review to the Gaming Commission a minimum of fifteen (15) calendar days prior to the event. Submissions shall include the following:
- a. Promotional profile(s) with all pertinent information (refer to [Section 15-3](#))
  - b. The estimated aggregate dollar value of the promotion(s). If the promotion(s) contains NCEP credits, the estimated number and non-cash value must be included
  - c. Checklists used by the gaming operations to verify the accuracy of the profile built into the marketing system
  - d. Signature of at least two (2) verifiers attesting to the accuracy of the profile module
  - e. Requirement for the posting of written rules for transparency and that verbal rules are unacceptable
  - f. Procedures for the use and protection of promotional gaming devices and equipment (i.e. roller drum, cash cube)
  - g. Any changes to or cancellation of a submission shall require a re-submission or notification of at least twenty-four (24) hours prior to the start of the event
  - h. The name of the direct mail or outbound electronic mailing vendor that will provide the patron notification of the promotion(s) or an indication that the patron will be notified of the promotions directly by the gaming operation.
  - i. Notification of a promotion to the patron shall include:
    - 1. The total value of the promotion including whether credits are cashable or non-cashable
    - 2. Start and expiration dates of the promotion

3. Description of the promotion
4. A responsible gaming statement

15-5. *Patron Tracking, Promotional, and/or Bonusing Systems.*

- a. Should the gaming operation elect to integrate a patron tracking, promotional and/or bonusing system into the CWS, in addition to all other requirements of this section, the gaming operation procedures must include the following provisions:
  1. Promotional system awards must be transferred into the appropriate patron accounts and utilize meter conventions set forth herein. The CWS must display the amount of the awards and prompt the patron to enter a verification process to redeem.
  2. All promotional awards must be converted into CEP funds, NCEP funds, or PAT funds respectively.
- b. If cashable and non-cashable credits are combined to a single credit meter at the gaming device, the CWS shall apply non-cashable credits to a patron's wagering activity before applying any cashable credits.
- c. Upon card out, all non-wagered NCEP credits shall be uploaded to the patron's account for future use. NCEP credits shall not remain on the gaming devices credit meter following a card out.
  1. All bonusing awards, which are based on gaming device events, will be added directly to the gaming device credit meter of gaming devices participating in the bonusing system.
  2. A bonus must be awarded as cashable credit.
  3. The promotional system and/or bonusing system must provide fair notice to the patron of the types of the awards through the electronic patron interface.
  4. Upon award, any disclaimers and rules for the promotional awards and/or bonusing awards must be clearly displayed to the patron through the electronic patron interface.
  5. The electronic patron interface on gaming devices participating in the promotional system and/or bonusing system must clearly indicate if any communication errors are present. The indicator must be presented to the patron and denote the inability to participate with the system.
- d. All changes to or implementations of patron tracking, promotional and/or bonusing systems must be provided in detail and if necessary, approved by the Gaming Commission, and/or an independent testing laboratory prior to implementation with all costs being borne by the gaming operation.

- e. The gaming operation is responsible for all promotional and bonusing system awards transferred to a patron account. Once transferred to a patron's account, the gaming operation shall only remove those promotional and bonusing system awards which have expired in accordance with the established rules.
- f. The gaming operation must communicate to the patron the expiration time and date of all promotional awards and bonusing awards. The gaming operation must also be visibly displayed on the electronic patron interface a message when the promotional awards and bonusing awards associated with gaming device play are no longer available.
- g. Should a patron elect to transfer NCEP credits to a gaming device, the gaming operation must visibly display in significant print on the electronic patron interface a message notifying the patron of the option to accept or cancel the NCEP transfer.
- h. Promotions may only be redeemed at the cage, a gaming device connected to an approved CWS, at redemption kiosks, or other locations as specified in the approved procedures. The CWS must verify the validity of the promotion prior to redemption and will electronically cancel the promotion in accordance with approved procedures.
- i. The issuance of promotional or bonusing awards to adjust an individual patron's account for a previously approved promotion must be sufficiently documented including the patron's name, patron's account number, the amount of the transaction, the explanation for the adjustment, and the name of employees issuing/authorizing the adjustment. Adjustments and authorization of adjustments must be compliant with approved department procedures. A record of all promotional award adjustments that occurred during the gaming day must be maintained. Procedures for additions/subtractions/adjustments to a promotional account shall be established, including procedures to investigate more than six (6) adjustments to an individual patron's account within a gaming week. This must include documentation and submission of investigation to the Gaming Commission.
- j. The gaming operation utilizing PAT transfers must establish terms and/or conditions for patron accounts prior to activating the CWS account. Patrons participating in the CWS must receive a copy of the terms and/or conditions upon the establishment of an account. Should the gaming operation revise or change the terms and/or conditions, all CWS account holders must receive notice of the change at least thirty (30) days prior to its effective date. The terms and/or conditions must include at a minimum:
  - 1. Privacy policy
  - 2. Terms of service
  - 3. Patron's responsibility for account security
  - 4. Patron's right to account information
  - 5. Responsible gaming information
  - 6. Dispute resolution procedures

7. Order of credits played
- k. If any part of the gaming operation's gaming floor has CWS features enabled, the gaming operation must ensure a prominent and conspicuous notice is located on the gaming devices denoting which gaming devices have CWS features enabled or alternatively, which gaming devices do not have CWS features enabled. The notice must be affixed in a manner that cannot be easily removed. If all gaming devices on the gaming operation's gaming floor have the CWS features enabled, a prominent and conspicuous notice must be placed at all entrances to the gaming floor. The gaming operation may elect to use electronic displays on the gaming device to serve as notice.
- l. At a patron's request, the gaming operation must provide a brochure(s)/card(s) outlining information necessary to participate in the CWS environment including at a minimum:
  1. How to open an account
  2. Definition of type of promotion offered by casino
  3. How to add funds to an account, where applicable
  4. How to download credits
  5. How to withdraw funds or close an account
  6. Responsible gaming information
  7. Patron's right to account information

## **Section 16. Accounting and Internal Audit**

- 16-1. *Conflicts of Standards.* When establishing SICS, the gaming operation should review, and consider incorporating, other external standards such as GAAP, GAAS, and standards promulgated by [GASB](#) and [FASB](#). In the event of a conflict between the SICS and the incorporated external standards, the external standards prevail.
- 16-2. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for safeguarding assets; administrative and accounting; gross gaming revenue computations; internal audit (if applicable); and any additional procedures required by this regulation or at the direction of the Gaming Commission.
- 16-3. *Accounting.* Gaming Commission approved controls and procedures must be established, and implemented to safeguard assets and ensure each gaming operation:
  - a. Prepares accurate, complete, legible, and permanent records of all transactions pertaining to gaming revenue and activities for operational accountability.
  - b. Prepares general accounting records according to GAAP on a double-entry system of accounting, maintaining detailed, supporting, subsidiary records, and performs the following activities:
    1. Record gaming activity transactions in an accounting system to identify and track all revenues, expenses, assets, liabilities, and equity

2. Record all markers, IOU's, returned checks, held checks, or other similar credit instruments
  3. Record journal entries prepared by the gaming operation and by any independent accountants used
  4. Prepare income statements and balance sheets
  5. Prepare appropriate subsidiary ledgers to support the balance sheet
  6. Prepare, review, and maintain accurate financial statements
  7. Prepare transactions in accordance with the approved procedures required in [Section 16-2](#)
  8. Record transactions to facilitate proper recording of gaming revenue and fees, and to maintain accountability of assets
  9. Compare recorded accountability for assets to actual assets at periodic intervals and take appropriate action with respect to any variances
  10. Segregate functions, duties, and responsibilities
  11. Prepare minimum bankroll calculations
  12. Maintain and preserve all financial records and relevant supporting documentation
- 16-4. Individual and statistical game records reflect statistical drop, statistical win, and the percentage of statistical win to statistical drop by each table game, each type of table game, by day, cumulative month-to-date, and year-to-date, and individual and statistical game records reflecting similar information for all other games.
- a. Gaming device analysis reports which, by each device, compare actual hold percentages to theoretical hold percentages
  - b. Other records required by this regulation
  - c. Journal entries prepared by the gaming operation and by its independent accountants
  - d. Any other records specifically required to be maintained
- 16-5. Each gaming operation shall establish administrative and accounting procedures for the purpose of determining effective control over a gaming operation's fiscal affairs. The procedures shall be designed to reasonably ensure that:
- a. Assets are safeguarded
  - b. Financial records are accurate and reliable
  - c. Transactions are performed only in accordance with approved procedures required in [Section 16-2](#)

- d. Transactions are recorded adequately to permit proper reporting of gaming revenue and of fees and taxes, and to maintain accountability of assets
- e. Recorded accountability for assets is compared with actual assets at reasonable intervals, and appropriate action is taken with respect to any discrepancies
- f. Functions, duties, and responsibilities are appropriately segregated in accordance with sound business practices.

16-6. *Gross Gaming Revenue Computations.*

- a. For table games, gross revenue equals the closing table bankroll, plus credit slips for cash, cheques or personal/payroll checks returned to the cage, plus drop, less opening table bankroll and fills to the table.
- b. For gaming devices, gross revenue equals drop, less fills, jackpot payouts and personal property awarded to patrons as gambling winnings.
- c. For each counter game, gross revenue equals:
  - 1. The money accepted by the gaming operation on events or games that occur during the month or will occur in subsequent months, less money paid out during the month to patrons on winning wagers (“cash basis”); or
  - 2. The money accepted by the gaming operation on events or games that occur during the month, plus money, not previously included in gross revenue, that was accepted by the gaming operation in previous months on events or games occurring in the month, less money paid out during the month to patrons as winning wagers (“modified accrual basis”).
- d. For each card game and any other game in which the gaming operation is not a party to a wager, gross revenue equals all money received by the operation as compensation for conducting the game.
  - 1. A gaming operation shall not include either skill win or loss in gross revenue computations.
- e. Retail sports betting gross gaming revenue means the total of all sums, including, but not limited to, valid or invalid checks, valid or invalid credit or debit card deposits, valid or invalid ACH deposits, currency, coupons, vouchers, entry fees assessed for tournaments, or instruments of monetary value whether collected or uncollected, in each case actually wagered by a patron at or with the retail sports betting operator on retail sports betting wagers or bets, less the following:
  - 1. Winnings
  - 2. Amounts returned to an authorized patron because a game, platform, or system malfunction or because the sports bet must be voided because of concerns regarding integrity of the wager or game

3. Uncollected markers or successfully disputed credit or debit charges that were previously included in the computation of gross gaming revenue
- 16-7. In computing gross revenue for gaming devices, the actual cost to the gaming operation of any personal property (other than costs of travel, lodging, services, food, and beverages) awarded as a payout to patrons may be deducted if the gaming operation maintains detailed documents supporting the deduction.
- 16-8. Each gaming operation shall establish internal controls sufficient to ensure that currency (other than tips or gratuities) received from a patron in the gaming area is promptly placed in a locked box in the table, or, in the case of a cashier, in the appropriate place in the cage, in the cash register, or in another approved repository.
- 16-9. If the gaming operation provides periodic payments to satisfy a payout resulting from a wager, the initial installment payment, when paid, and the actual cost of a payment plan, which is funded by the gaming operation, may be deducted from winnings. The gaming operation is required to obtain the approval of all payment plans from the Gaming Commission. For any funding method which merely guarantees the gaming operation's performance, and under which the gaming operation makes payments out of cash flow (i.e., irrevocable letters of credits, surety bonds, or other similar methods), the gaming operation may only deduct such payments when paid to the patron.
- 16-10. Cash-out tickets issued at a gaming device shall be deducted from gross revenue as jackpot payouts in the month the tickets are issued by the gaming device. Tickets deducted from gross revenue that are not redeemed within a period, not to exceed two hundred (200) days of issuance, shall be included in gross revenue. An unredeemed ticket previously included in gross revenue may be deducted from gross revenue in the month redeemed.
- 16-11. A gaming operation may not deduct from gross revenues from the unpaid balance of a credit instrument extended for purposes other than gaming.
- 16-12. A gaming operation may deduct from gross revenue the unpaid balance of a credit instrument if the gaming operation documents, or otherwise keeps detailed records of, compliance with the following requirements:
  - a. The gaming operation can document that the credit extended was for gaming purposes.
  - b. The gaming operation has established procedures and relevant criteria to evaluate a patron's credit reputation or financial resources and to then determine that there is a reasonable basis for extending credit in the amount or sum placed at the patron's disposal.
  - c. In the case of personal checks, the gaming operation has established procedures to examine documentation, which would normally be acceptable as a type of identification when cashing checks and has recorded the patron's bank check guarantee card number or credit card number, or has satisfied [Section 7-4](#), as management may deem appropriate for the check cashing authorization granted.

- d. In the case of third-party checks for which cash, or cheques have been issued to the patron, or which were accepted in payment of another credit instrument, the gaming operation has established procedures to examine documentation, normally accepted as a means of identification when cashing checks, and has, for the check's maker or drawer, satisfied in [Section 7-4 \(e\)](#), as management may deem appropriate for the check-cashing authorization granted;
- e. In the case of guaranteed drafts, procedures shall be established to ensure compliance with the issuance and acceptance procedures prescribed by the issuer.
- f. The gaming operation has established procedures to ensure that the credit extended is appropriately documented, not least of which would be the patron's identification and signature attesting to the authenticity of the individual credit transactions. The authorizing signature shall be obtained at the time credit is extended.
- g. The gaming operation has established procedures to effectively document its attempt to collect the full amount of the debt. Such documentation includes but is not limited to letters sent to the patron, logs of personal or telephone conversations, proof of presentation of the credit instrument to the patron's bank for collection, settlement agreements, or other documents which demonstrate that the gaming operation has made a good faith attempt to collect the full amount of the debt.

16-13. *Maintenance and Preservation of Books, Records, and Documents.*

- a. All original books, records, and documents pertaining to the conduct of wagering activities shall be retained by a gaming operation in accordance with the following schedule. A record that summarizes gaming transactions is sufficient, provided that all documents containing an original signature(s) attesting to the accuracy of a gaming related transaction are independently preserved. Original books, records, or documents shall not include copies of originals, except for copies that contain original comments or notations on parts of multi-part forms.
- b. The following original books, records, and documents shall be retained by a gaming operation for a minimum of five (5) years:
  - 1. Cage accountability documents
  - 2. Documentation supporting the calculation of table game win
  - 3. Documentation supporting the calculation of gaming device win
  - 4. Documentation supporting the calculation of retail sports betting win
  - 5. Table games statistical analysis reports
  - 6. Gaming device statistical analysis reports
  - 7. Retail sports betting statistical analysis reports
  - 8. Internal audit documentation and reports

9. Documentation supporting the write-off of gaming credit instruments and named credit instruments
  10. All other books, records, and documents pertaining to the conduct of wagering activities that contain original signature(s) attesting to the accuracy of the gaming related transaction
- c. The above standards shall apply without regard to the medium by which the book, record or document is generated or maintained (i.e., paper, computer-generated, magnetic media, etc.).

16-14. *Internal Audit.*

- a. A separate Internal Audit Department shall be maintained whose primary function is performing internal audit work and that is independent with respect to the department's subject to audit. Currently, this function resides with the Gaming Commission with a direct report to the Executive Director. This does not prevent the gaming operation from maintaining an Internal Audit Department.
- b. If the gaming operation maintains an Internal Audit Department, it must report directly to the Ogema of the Tribe. Furthermore, the Internal Audit Department of gaming operation must establish and implement Gaming Commission approved controls and procedures to ensure that:
  1. Internal auditors perform audits of each department of a gaming operation, at least annually, to review compliance with TMICS, and SICS, which include at least the following areas:
  2. Table games, including supervision, fill and credit procedures, table inventory forms, standards for playing cards and dice, plastic cards, analysis of table game performance, marker credit play, name credit instruments, call bets, rim credit, and foreign currency
  3. Gaming devices, including supervision, access listing, prize payout and fills, cash and cash equivalent controls, gaming machine components, operations, vouchers, tickets, standards for evaluating theoretical and actual hold percentages, gaming device drop box contents, in-house progressive gaming device standards, wide area progressive gaming device standards, and account access cards
  4. Gaming promotions and patron tracking procedures, including supervision, gaming promotion rules and patron tracking systems
  5. Complimentary services or items, including procedures for issuing, authorizing, redeeming, and reporting complimentary service items
  6. Patron deposit accounts and cashless systems procedures, including supervision, patron deposit accounts and cashless systems, as well as patron deposits, withdrawals and adjustments

7. Lines of credit procedures, including establishment of lines of credit policy
8. Drop and count standards, including supervision, count room access, count team, table game drop standards, gaming device and financial instrument drop standards, table game count standards, gaming device financial instrument count standards, collecting currency cassettes and financial instrument storage components from kiosks, kiosk count standards, and controlled keys
9. Cage, vault, cash and cash equivalent procedures, including supervision, cash and cash equivalents, personal checks, cashier's checks, traveler's checks, payroll checks, and counter checks, cage and vault accountability, kiosks, patron deposited funds, promotional payouts, drawings, giveaway programs, and cage and vault access
10. Information technology, including supervision, systems' logical and physical controls, independence, physical security, logical security, user controls, installations and/or modifications, remote access, incident monitoring and reporting, data back-ups, software downloads, and verifying downloads
11. Accounting standards, including accounting records, maintenance and preservation of financial records and relevant supporting documentation
12. Internal auditors are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation reporting to the Tribal Ogema, auditors of the Gaming Commission, or an outside CPA firm may perform this function).
13. Documentation such as checklists, programs, reports, etc. is prepared to evidence all internal audit work and follow-up performed as it relates to compliance with SICS, and these TMICS, including all instances of noncompliance.
14. Audit reports are maintained and made available to the Commission upon request and must include the following information:
  - A. Audit objectives
  - B. Audit procedures and scope
  - C. Findings and conclusions
  - D. Recommendations, if applicable
  - E. Management's response
15. All material exceptions identified by internal audit work are investigated and resolved and the results are documented.
16. Internal audit findings are reported to management, responded to by management stating corrective measures to be taken, and included in the report delivered to management, the Tribe, Gaming Commission, audit committee, or other entities designated by the Tribe for corrective action.

17. Follow-up observations and examinations are performed to verify that corrective action has been taken regarding all instances of non-compliance. The verification is performed within six (6) months following the date of notification of non-compliance.

16-15. *Annual Requirements.*

- a. **Agreed-Upon Procedures.** A CPA independent of the gaming operation must be engaged to perform an assessment to verify whether the gaming operation is compliant with the TMICS. The assessment must be performed in accordance with Agreed-Upon Procedures and the most recent versions of the [Statements on Standards for Attestation Engagements and Agreed-Upon Procedures Engagements \(collectively “SSAEs”\)](#), issued by the American Institute of Certified Public Accountants.
- b. The tribe may submit a copy of the Agreed-Upon Procedures report to the National Indian Gaming Commission within one hundred twenty (120) days of the gaming operation's fiscal year end in conjunction with the submission of the annual financial audit report required pursuant to [25 CFR Part 571](#).
- c. **Review of internal audit**
  1. The CPA must determine compliance by the gaming operation with the internal audit requirements in this paragraph (d) by:
    - A. Completing the internal audit checklist
    - B. Ensuring that the internal auditor completed checklists for each gaming department of the operation
    - C. Verifying that any areas of non-compliance have been identified
    - D. Ensuring that audit reports are completed and include responses from management
    - E. Verifying that appropriate follow-up on audit findings has been conducted, and necessary corrective measures have been taken to effectively mitigate the noted risks
  2. If the CPA determines that the internal audit procedures performed during the fiscal year have been properly completed, the CPA may rely on the work of the internal audit for the completion of the TMICS checklists as they relate to the standards covered by this part.
  3. **Report format.** The SSAEs are applicable to agreed-upon procedures engagements required in this part. All noted instances of noncompliance with the TMICS, if they provide the same level of controls as the TMICS, must be documented in the report with a narrative description, the number of exceptions and sample size tested.

## **Section 17. Lines of Credit**

17-1. *Supervision.* Refer to [Section 3-4](#).

17-2. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for the following: Application, modification, re-establishment of lines of credit; Levels of authorization; verification of credit worthiness; recording of patron information; issuance of line of credit; marker forms; write-offs; settlements; collections; and any additional procedures required by this regulation or at the direction of the Gaming Commission.

17-3. *Establishment of Lines of Credit Policy.*

- a. If a gaming operation extends lines of credit, controls must be established, and procedures implemented to safeguard the assets of the gaming operation. Such controls must include a line of credit policy including the following:
  1. A process for the patron to apply for, modify, and/or re-establish lines of credit, to include required documentation and credit line limit
  2. Authorization levels of credit issuer(s)
  3. Identification of employees authorized to issue lines of credit
  4. A process for verifying an applicant's credit worthiness
  5. A system for recording patron information, to include:
    - A. Name, current address, and signature
    - B. Identification credential
    - C. Authorized credit line limit
    - D. Documented approval by an employee authorized to approve credit line limits
    - E. Date, time and amount of credit issuances and payments
    - F. Amount of available credit
  6. A process for issuing lines of credit to:
    - A. Verify the patron's identity
    - B. Notify the patron of the lines of credit terms, including obtaining patron's written acknowledgment of the terms by signature

- C. Complete a uniquely identified, multi-part, lines of credit issuance form, such as a marker or counter check, which includes the terms of the lines of credit transaction
  - D. Obtain required signatures
  - E. Determine the amount of the patron's available lines of credit.
  - F. Update the credit balance record at the time of each transaction to ensure that lines of credit issued are within the established limit and balance for that patron.
  - G. Require the employee issuing the lines of credit to be independent of the employee who authorized the lines of credit.
7. A policy establishing credit line limit exceptions to include the following:
- A. Identification of the employee(s) authorized to permit a credit line limit to be exceeded
  - B. Authorization thresholds
  - C. Required documentation
8. A policy governing increases and decreases to a patron's lines of credit account balances to include the following:
- A. Documentation and record keeping requirements.
  - B. Independence between the department that receives the payment and the department that maintains custody of the credit balance for payments made by mail.
  - C. Collections
  - D. Periodic audits and confirmation of balances
  - E. If a collection agency is used, a process to ensure documentation of all increases and decreases the lines of credit account balances.
9. A policy governing write-offs and settlements to include:
- A. Identification of employee(s) authorized to approve write-offs and settlements
  - B. Authorization levels for write-offs and settlements of lines of credit instruments

- C. Required documentation for write-offs and settlements
- D. Independence between the employee who established the lines of credit and the employee writing off or settling the lines of credit instrument
- E. Necessary documentation for the approval of write-offs and settlements and transmittal to the appropriate department for recording and deductibility.

17-4. *Variances.* Refer to [Section 3-3](#).

## **Section 18. Auditing Revenue**

18-1. *Supervision.* Refer to [Section 3-4](#).

18-2. *Independence.* Audits must be performed by employee independent of the transactions being audited.

18-3. *Documentation.* The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.

18-4. *Controls and Procedures.* Gaming Commission approved controls and procedures must be established, and implemented to audit each of the following operational areas:

a. Table games.

1. If a table game has the capability to determine drop (e.g., bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.
2. Accounting/Revenue Audit shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.
3. All noted improper transactions, or unusual occurrences, shall be investigated with the results documented.
4. A daily recap shall be prepared for the day and month-to-date, which shall include the following information:
  - A. Drop
  - B. Win
  - C. Gross revenue
5. Monthly, the Revenue Audit/Accounting shall reconcile gross revenue from the general ledger to the month-end daily table games recap.

b. Gaming Devices.

1. For online gaming monitoring systems, Gaming Commission approved procedures shall be performed at least monthly to verify that the system is transmitting and receiving data from the gaming devices properly and to verify the continuing accuracy of the coin-in meter readings as recorded in the gaming device statistical report.
  2. Currency interface systems, for at least one (1) drop period per month Accounting/Revenue Audit shall make such comparisons as necessary to the system generated count as recorded in the gaming device statistical report. Discrepancies shall be resolved prior to generation/distribution of gaming device reports.
  3. For each drop period, Accounting/Revenue Audit shall compare the coin-to-drop meter reading to the actual drop amount. Discrepancies should be resolved prior to generation/distribution of on-line gaming monitoring system statistical reports.
  4. For each drop period, Accounting/Revenue Audit shall compare the bill-in meter reading to the total bill acceptor drop amount for the period. Discrepancies shall be resolved before the generation/distribution of gaming device statistical reports.
  5. At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the Gaming Commission.
  6. At least monthly, take a random sample, foot the vouchers redeemed, and trace the totals to the totals recorded in the voucher system and to the amount recorded in the applicable cashier's accountability document.
  7. At least annually, Accounting/Revenue Audit shall randomly verify that equivalent game control program media changes are properly reflected in the gaming device analysis reports.
  8. Review exception reports for all computerized gaming device systems daily for propriety of transactions and unusual occurrences.
- c. Drop and count.
1. At least quarterly, unannounced currency counter and currency counter interface (if applicable) tests must be performed, and the test results documented and maintained. All denominations of currency and all types of vouchers counted by the currency counter must be tested. The result of these tests must be documented and signed by the employee(s) performing the test.
  2. At least quarterly, unannounced weigh scale and weigh scale interface (if applicable) tests must be performed, and the test results documented and maintained. The result of these tests must be documented and signed by the employee(s) performing the test.

3. For computerized key systems controlling access to drop and count keys, perform the following procedures:
    - A. At least quarterly, review the report generated by the computerized key systems indicating the transactions performed by employees that adds, deletes, and changes users' access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide adequate control over the access to the drop and count keys. Also, determine whether any drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
    - B. At least quarterly, review the report generated by the computerized key systems indicating all transactions performed to determine whether any unusual drop and count key removals or key returns occurred.
    - C. At least quarterly, review a sample of users that are assigned access to the drop and count keys to determine that their access to the assigned keys is appropriate relative to their job position.
    - D. All noted improper transactions, or unusual occurrences shall be investigated with the results documented.
  4. At least quarterly, an inventory of all controlled keys must be performed and reconciled to records of keys made, issued, and destroyed. Investigations must be performed for all keys unaccounted for, and the investigation documented.
- d. Patron Accounts, and Promotional Accounts
1. A patron account balance summary report, by patron account number and in total, is created on demand at least daily, which includes:
    - A. Beginning balance
    - B. Dollar amounts of credits and of debits, credits, and debits defined as:
      - i. **Credits** to a patron account may be made by the following means:
        - (aa) Deposits
        - (bb) Amounts won by the patron
        - (cc) Transfers from a game or gaming device
        - (dd) Promotional credits, or bonus credits provided by the gaming operation and subject to the terms of use established by the gaming operation and if such credits are clearly identified as such

- (ee) Adjustments made by the gaming operation following the resolution of a dispute
- (ff) Any other means approved by the Gaming Commission
- ii. **Debits** to a patron account may be made by the following means:
  - (aa) Withdrawals
  - (bb) Amounts wagered by the patron
  - (cc) Transfers to a game or gaming device
  - (dd) Adjustments made by the licensee following the resolution of a dispute
  - (ee) Service or other transaction-related charges authorized by the patron
  - (ff) Any other means approved by the Gaming Commission

C. Ending balance

***\*Note: All patron accounts, regardless of account balance, must be included on the patron account balance summary report.***

- 2. Patron Account Transfers (PAT) Detail report by gaming area is created and maintained by day, which includes:
  - A. For each game/gaming device all transactions which includes (e.g., by gaming device number, socket ID, table game number, keno/bingo game if more than one, counter game, etc.):
    - i. Date and time
    - ii. Account number
    - iii. Transaction type (e.g., transfer to/transfer from)
    - iv. PAT in amount
    - v. PAT out amount
    - vi. For in person counter game transactions, sports book ticket writer/cashier station
  - B. Subtotal of PAT in and PAT out by game/gaming device

- C. By gaming area and in total, PAT in and PAT out
3. A PAT By Gaming Area Report for each gaming area utilizing patron accounts is created daily which includes:
    - A. PAT in by game/gaming device
    - B. PAT out by game/gaming device
    - C. Total PAT in and total PAT out
  4. A PAT Summary Report, by gaming area and in total, is created daily summarizing the daily, month-to-date, and year-to-date PAT in and PAT out.
  5. Patron Accounts
    - A. At least weekly, reconcile patron account liability to the system record.
    - B. At least weekly, review manual increases and decreases to/from patron accounts to ensure proper adjustments are authorized.
- e. Cashless Wagering Systems (CWS). The gaming operation must, on each gaming day, prepare a CWS meter comparison report on all gaming devices with CWS options enabled. The report will compare the CWS meter deltas of the gaming device internal soft meters with the meter deltas of the CWS. The gaming device soft meter deltas may be obtained by manually recording the values at the gaming device, or by polling the gaming device using the CWS. Any meter variance between the deltas of the gaming device and the CWS which is greater than 1% must be investigated and findings documented and provided to the Gaming Commission. Any gaming device exhibiting such a variance for three consecutive days must be removed from service. Once the malfunction has been identified and repaired, the gaming device may be placed back into service. Upon placing the gaming device back in service, the gaming operation must submit a detailed report to the Gaming Commission annotating the malfunction and the corrective action steps.
- f. Gaming promotions and patron tracking.
1. At least monthly, review promotional payments, drawings, and giveaway programs to verify payout accuracy and proper accounting treatment in accordance with the rules provided to patrons.
  2. At least monthly, for computerized patron tracking systems, perform the following procedures:
    - A. Review authorization documentation for all manual point additions/deletions for propriety
    - B. Review exception reports, including transfers between accounts

- C. Review documentation related to access to inactive and closed accounts
- 3. At least annually, all computerized patron tracking systems must be reviewed by employees independent of the employees that set up or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization. Document and maintain the test results.
- 4. A record of all promotional award adjustments that occurred during the gaming day must be maintained. The Accounting/Revenue Audit Department must conduct a daily audit of these adjustments to verify that all the required information is present and to detect any adjustments that exceed guidelines for authorizing promotional award adjustments established by the gaming operation and maintained in the Accounting/Revenue Audit Department.
- g. Complimentary services or items. At least monthly, review the reports required in [Section 12-2 \(d\) \(1\) \(A-E\)](#). These reports must be made available to those entities authorized by the Gaming Commission or by tribal law.
- h. Lines of credit.
  - 1. At least three (3) times per year, an employee independent of the cage, credit, and collection functions must perform the following review:
    - A. Select a sample of line of credit accounts.
    - B. Ascertain compliance with credit limits and other established credit issuance procedures.
    - C. Reconcile outstanding balances of both active and inactive (including write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure needs to be performed once per year for inactive accounts.
    - D. Examine line of credit records to determine that appropriate collection efforts are being made, and payments are being properly recorded.
    - E. For at least five (5) days during the review period, subsequently reconcile partial payment receipts to the total payments recorded by the cage for the day and account for the receipts numerically.
  - 2. At least monthly, perform an evaluation of the collection percentage of credit issued to identify unusual trends.
- i. Cage, vault, cash, and cash equivalents.
  - 1. At least monthly, the cage accountability must be reconciled to the general ledger.
  - 2. At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.

3. Twice annually, a count must be performed of all funds in all gaming areas (i.e. cages, vaults, and booths (including reserve areas), kiosks, voucher redemption machines, and change machines. Count all cheques by denomination and type. Count individual straps, bags, and imprest banks on a sample basis. Reconcile all amounts counted to the amounts recorded on the corresponding accountability forms to ensure that the proper amounts are recorded. Maintain documentation evidencing the amount counted for each area and the subsequent comparison to the corresponding accountability form. The count must be completed within the same gaming day for all areas.
- j. Counts must be observed by employees independent of the department being counted. It is permissible for employees responsible for the funds to perform the actual count while being observed.
1. At least annually, select a sample of invoices for cheques purchased, and trace the dollar amount from the purchase invoice to the accountability document that indicates the increase to the cheque inventory to ensure that the proper dollar amount has been recorded.
  2. At each business year end, create and maintain documentation evidencing the amount of the cheque liability, the change in the liability from the previous year, and explanations for adjustments to the liability account including any adjustments for cheque float.
  3. At least monthly, review a sample of returned checks to determine that the required information was recorded by cage employee(s) when the check was cashed.
  4. At least monthly, review exception reports for all computerized cage systems for propriety of transactions and unusual occurrences. The review must include, but is not limited to, voided authorizations. All noted improper transactions or unusual occurrences identified must be investigated and the results documented.
  5. Daily, reconcile all parts of forms used to document increases/decreases to the total cage inventory, investigate any variances noted, and document the results of such investigations.
- k. Inventory.
1. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, playing cards, keys, pre-numbered and/or multi-part forms.
  2. Periodically perform minimum bankroll calculations to ensure that the gaming operation maintains cash in an amount sufficient to satisfy the gaming operation's obligations.
- l. Retail sports betting.

1. The gaming operation shall generate and submit to the Gaming Commission the following reports on at least a monthly basis:
  - A. Detailed reconciliation report, which includes win/loss, day, expired tickets, expired vouchers, voucher liability.
  - B. Summary reconciliation report, which includes tickets sold, open tickets previous month, open tickets current month, tickets settled, tickets reset-tled, tickets voided, tickets cancelled, tickets failed, win/loss, ticket lia-bility, voucher liability, total liability, sports book gross gaming revenue, adjustments, prior day loss carry forward, total sports book gross gaming revenue.
  - C. Monthly voucher liability report which shall include voucher number, date and time of issuance, cashiering location, amount, currency type, total number of vouchers at month end, total voucher liability at month end.
  - D. Monthly ticket liability report which shall include ticket number, date and time of issuance, amount, currency type, event by title, wager description and ticket status.
  - E. Sports book reserve report. A system report that displays the amount of funds held in reserve for the retail sports book.
2. Daily Revenue Audit shall:
  - A. Verify total wagers placed, payouts issued and net win/loss
  - B. Reconcile betting slips and ticket logs against system reports
  - C. Confirm voided or canceled bets are properly documented and authorized

## **Section 19. BSA/AML and Currency Transaction Reporting**

### *19-1. Compliance.*

- a. Formal program required.
  1. All gaming operations shall implement and maintain a formal BSA/AML compliance program. The program shall satisfy the requirements of: [Public Law 116-283 div F \(AMLA of 2020\)](#); [USA Patriot Act](#); [31 CFR – Chapter X](#); [31 USC § 5318 \(h\) \(1\)](#); and [31 USC Chapter 53, Sub Chapter II](#).
  2. Independent testing of the developed program, in accordance with the standards listed in [Section 19-1\(a\)](#), is required.

- A. Copies of all independent testing reports shall be delivered to the Gaming Commission no less than forty-eight (48) hours after issuance.
  - B. Copies of all remediation and/or follow-up reports shall be delivered to the Gaming Commission no less than forty-eight (48) hours after issuance.
3. The BSA/AML program shall be evaluated no less than annually or at any time federal law changes that would require revisions and/or updates to the program to remain compliant with federal law.

## **Section 20. Surveillance**

20-1. *Supervision.* Supervision must be provided as needed in surveillance by employees with authority equal to or greater than those being supervised.

- a. The Surveillance operation room(s) shall be located so that it is not readily accessible by gaming operation employees and/or the public and shall be secured to prevent unauthorized entry.

20-2. *Surveillance Equipment, Activities, and Control Room(s).* Gaming Commission approved controls and procedures shall be established and implemented that include the following:

- a. The surveillance system must be maintained and operated from a staffed surveillance operation room(s).
- b. The surveillance operation room(s) must be secured to prevent unauthorized entry.
- c. Access to the surveillance operation room(s) must be limited to surveillance employees and other authorized persons.
- d. The activities (observed/reported) of the Surveillance Department shall be logged and shall be stored securely within the department.
- e. Surveillance operation room(s) access logs must be maintained.
- f. Surveillance operation room equipment must have total override capability over all other satellite surveillance equipment.
- g. Power loss to the surveillance system:
  - 1. In the event of power loss to the surveillance system, an auxiliary or backup power source must be available and capable of providing immediate restoration of power to the surveillance system to ensure that surveillance employees can observe all areas covered by dedicated cameras.
- h. The surveillance system must record an accurate date and time stamp on recorded events. The displayed date and time must not significantly obstruct the recorded view.
- i. The Surveillance Department shall be staffed with trained employees and supervision must be provided as needed by employees with equal authority or greater than those being supervised.

- j. All surveillance employees shall be trained in the use of the equipment, knowledge of the games, and house rules.
  - k. Each camera required by the standards in this section must be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled.
  - l. The surveillance system must:
    - 1. Have the capability to display all camera views on a monitor
    - 2. Include enough recording devices to record the views of all cameras required by this section
    - 3. Record all camera views
    - 4. Include enough monitors to simultaneously display gaming and count room activities
  - m. A periodic inspection of the surveillance systems must be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented, and repairs initiated within seventy-two (72) hours.
    - 1. If a dedicated camera malfunctions, alternative security procedures, such as additional supervisory or security employees, must be implemented immediately.
    - 2. The Gaming Commission's Executive Director must be notified of any surveillance system and/or camera(s) that have malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.
- 20-3. *Additional Surveillance Requirements.* Regarding the following functions, controls must also include:
- a. Surveillance of the progressive prize meters for gaming systems at the following thresholds:
    - 1. Wide area progressives with a reset amount of \$1 million
    - 2. In-house progressives with a reset amount of \$250,000.00
  - b. Gaming devices.
    - 1. Except as otherwise provided in paragraphs (c)(1) of this section, gaming devices offering a payout of more than \$250,000.00 shall be monitored and recorded by a dedicated camera(s) to provide coverage of:
      - A. All patrons and employees at the gaming device
      - B. The face of the gaming device, with sufficient clarity to identify the payout line(s) of the gaming device
  - c. Table games.

1. Except for table game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:
    - A. An overview of the activities on each table surface, including card faces and cash and/or cash equivalents
    - B. An overview of table game activities, including patrons and dealers
  2. For table game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are exchanged.
  3. Progressive table games.
    - A. Progressive table games with a progressive jackpot of \$25,000.00 or more shall be monitored and recorded by dedicated cameras that provide coverage of:
      - i. The table surface, sufficient that the card values and card suits can be clearly identified
      - ii. An overall view of the entire table with sufficient clarity to identify patrons and dealers
      - iii. A view of the progressive meter jackpot amount. If several tables are linked to the same progressive jackpot meter, only one meter needs to be recorded
- d. Cage and vault.
1. The surveillance system must monitor and record a general overview of activities occurring in each cage and vault area with sufficient clarity to identify employees within the cage and patrons and employees at the counter areas and to confirm the amount of each cash transaction.
  2. Each cashier station must be equipped with one (1) dedicated overhead camera covering the transaction area.
  3. The cage or vault area in which exchange and transfer transactions occur must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the cheque values and the amounts on the exchange and transfer documentation. Controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation.
- e. Count rooms.
1. The surveillance system must monitor and record with sufficient clarity a general overview of all areas where cash or cash equivalents may be stored or counted.

2. The surveillance system must provide coverage of count equipment with sufficient clarity to view any attempted manipulation of the recorded data.
  - f. Kiosks. The surveillance system must monitor and record a general overview of activities occurring at each kiosk with sufficient clarity to identify the activity and the individuals performing it, including maintenance, drops or fills, and redemption of wagering vouchers or credits.
  - g. Entrances and Exits. All entrances and exits of the gaming facility shall be monitored by a dedicated camera.
  - h. Exterior of Facility. Cameras shall be positioned to enable coverage of the exterior of the gaming facility.
- 20-4. *Reporting Requirements.* Gaming Commission approved procedures must be implemented for reporting suspected crimes and suspicious activity.
- 20-5. *Recording Retention.* Gaming Commission approved controls and procedures shall be established, and implemented that include the following:
- a. All recordings required by this section must be retained for a minimum of seven (7) calendar days; and
  - b. Suspected crimes, suspicious activity, or detentions discovered within the initial retention period must be copied and retained for a period, not less than one (1) year.
- 20-6. *Logs.* Logs must be maintained and demonstrate the following:
- a. Compliance with the storage, identification, and retention standards required in this section.
  - b. Each malfunction and repair of the surveillance system as defined in this section.
  - c. Activities performed by surveillance employees as required by the controls in this section.

## **Section 21. Retail Sports Betting**

- 21-1. *Supervision.* Refer to [Section 3-4](#).
- 21-2. *Information Technology Requirements.* Refer to [Section 8](#).
- 21-3. *Drop and Count Requirements.* Refer to [Section 10](#).
- 21-4. *Patron Tracking Requirements.* Refer to [Section 11](#).
- 21-5. *Complimentary Requirements.* Refer to [Section 12](#).
- 21-6. *Promotional Requirements.* Refer to [Section 14](#) and [15](#), as applicable.
- 21-7. *Accounting and Revenue Audit Requirements.* Refer to [Sections 16](#) and [18](#), respectively.
- 21-8. *Patron Deposit Account Requirements.* Refer to [Section 13](#).

21-9. *BSA/AML Requirements.* Refer to [Section 19](#).

21-10. *Procedures Required.* The gaming operation subject to Gaming Commission approval, shall develop and implement procedures for the following; recording of transactions; security and sharing of PPI; opening and closing of betting stations; calculation and recordation of revenue; security of sports betting devices and associated equipment; receipt, handling and storage of sports betting devices and associated equipment; deterrence, detection, and prevention of potential cheating; money generated is safeguarded and properly accounted for; prevention of sports betting by persons under eighteen (18) years of age, all excluded individuals; to cancel or void wagers; to identify wagers that may indicate cheating, manipulation, interference of regular conduct of a sport, or violations of integrity of any sport in which wagers are made; for the response to alerts of suspicious activity or wagers from the sport betting provider or other property; and any additional procedures required by this regulation or at the direction of the Gaming Commission.

21-11. *Equipment Standards and Record Keeping.* All equipment and systems integral to the conduct of sports betting shall be tested and certified for compliance with Gaming Commission Regulation – [Chapter 2](#).

- a. The sports book ticket writer must examine and test the stamping machine daily to ensure the date is correct and the time is to the nearest minute. These test results shall be kept at each location. The date/time stamping machines used for voided tickets and manual payouts shall have battery back-ups installed as a power supply in the event of a loss of power to the stamping machines.
- b. The sports book ticket writer shall document the results of the test in a log which includes location, date, time of test, time per computer, name, employee number and signature of the employee performing the test. Sports book ticket writers shall not have access to adjust the clock. Adjustments shall be made by supervisory employees or above with a recording of all adjustments in the test log.
- c. Testing for system integrity and security assessment shall be performed annually by an independent professional.

21-12. *House Rules – Terms and Conditions.* The retail sports betting operator shall adopt and adhere to comprehensive written house rules that are compliant with Gaming Commission Regulation – [Chapter 13](#). Approved house rules must be immediately available to all patrons at the sports book’s licensed premises.

- a. A retail sports book operator shall develop terms and conditions for sports wagering on athletic events. The terms and conditions and any changes thereto must be acknowledged by the patron, and the acknowledgement must be date and time-stamped by the sports wagering system.
- b. The terms and conditions must address all aspects of the retail sports wagering operation, including but not limited to, the following:

Chapter 11: Class III Tribal Minimum Internal Control Standards

Gaming Commission Approved: 02-03-26

Gaming Commission Resolution: #GC26-0203-03

Tribal Council Acceptance: 05-13-26

1. Name of the party or parties with whom the patron is entering into a contractual relationship, including any retail sports betting operator
2. Patron's consent to have the retail sports betting operator confirm the patron's age and identity
3. Rules and obligations applicable to the patron other than House Rules of retail sports wagering
4. Consent to the jurisdiction of the Little River Band of Ottawa Indians to resolve any disputes arising out of retail sports wagering
5. Full explanation of all fees and charges imposed upon a patron related to retail sports wagering transactions, when applicable
6. Availability of account statements detailing patron account activity
7. Privacy policies, including information access and use of patron data
8. Legal age policy, including a statement that it is a criminal offense to allow a person who is under the age of eighteen (18) to participate in retail sports wagering and a patron who does so shall be prohibited from participating in retail sports wagering
9. Patron's rights to set responsible gaming limits and self-exclude
10. Notice that a malfunction voids all transactions
11. Detailed information regarding compulsive and problem gambling and self-exclusion to be displayed on a patron protection page
12. Method for filing a complaint with the retail sports betting operator and method for filing with the Gaming Commission an unresolved complaint after all reasonable means to resolve the complaint with the retail sport betting operator have been exhausted in accordance with Gaming Commission Regulation – [Chapter 9](#)
13. Method for obtaining a copy of the terms and conditions
14. Method for the patron to obtain account and wagering history from the retail sports book operator
15. A distinction between the house rules – terms and conditions between the retail sports book operation and the online sports book operation

16. Any other information as required by the Gaming Commission

21-13. *Wagering and Payout Standards.* The gaming operation shall develop and submit for approval procedures detailing the requirements for wagering. These procedures shall include acceptance of wagers (both manual and betting kiosk), acceptance of wagers or payouts exceeding \$9,999.99, payout of all wagers including mail-in winning tickets/vouchers, confirmation of bets, cancellation/voiding of wagers, multiple wagers, structured wagers, prohibited wagers, suspicious wagers, issuance and control of betting tickets.

21-14. *Segregation of Duties.*

- a. Employees who perform the supervisory function of approving void tickets shall not write tickets unless:
  1. The only supervisory function allowed is approval of void tickets prior to post time
  2. A supervisor, acting as a ticket sports book ticket writer, may not authorize a void for a ticket which they wrote.
  3. All tickets written by a supervisor which are subsequently voided, and all not-in-computer voids must be recorded in a log, used specifically for that purpose, which indicates the supervisor's/sports book ticket writer's name and the name of the person authorizing the void.
    - A. The log shall be forwarded to the Accounting/Revenue Audit Department daily for a 100% audit of voids for the proper signature, void designation on the ticket, date and time of the void on the ticket (for not-in-computer voids), any indications of "past-post" voiding, and other appropriate regulation compliance. Any discrepancies noted and investigations performed shall be documented in writing and maintained.
    - B. An independent department (i.e. Accounting/Revenue Audit or IT) shall perform a 100% audit of the exception report for inappropriate use of the supervisory password. Any discrepancies noted and investigations performed shall be documented in writing and maintained.
- b. Employees who perform administrative functions shall not write or cash tickets.
- c. Employees who act as sports book ticket writer/cashier shall not switch shifts or days to having administrative functions. Conversely, any employee assigned administrative functions shall not switch for certain shifts or days to having sports book ticket sports book ticket writer/cashier functions.

21-15. *Required Reports.*

- a. Nothing in this section shall be interpreted to prohibit onsite sports books from accepting anonymous sports wagers at self-service kiosks or point of sale terminals. Such wagers shall be included in the required reports detailed in this section and identified as “anonymous patron” or a similar identifier.
- b. A retail sports betting operator must generate reports specific to its retail sports betting operations as specified by the Gaming Commission that shall include, at a minimum:
  1. The report title
  2. The date and/or time-period of activity, or description “as of” a point in time
  3. The date and time the report was generated
  4. Page numbering, indicating the current page and total number of pages
  5. Subtotals and grand totals as required by the Gaming Commission
  6. A description of any filters applied to the data presented in the document(s)
  7. Column and row titles, if applicable
  8. The name of the retail sports betting operator
- c. All required reports shall be generated by the gaming operation, even if the period specified contains no data to be presented. The report generated shall indicate all required information and contain an indication of “NO Activity” or similar message if no data appears for the period specified.
- d. The sports wagering system shall generate, at a minimum, the following reports and shall be available upon request:
  1. Transaction report(s) which lists, by sports book ticket writer/cashier, for each write, payout and void transaction: the ticket number, transaction date and time, sports book ticket writer/cashier station number, sports book ticket writer/cashier employee number, transaction type, ticket description, and amount of transaction. The report lists by sports book ticket sports book ticket writer/cashier, and in total, the amount of the write, voids, payouts, vouchers issued, and vouchers redeemed. Transaction report(s) may be a combination of more than one (1) report.
  2. Sports Book results report, which lists, for each event: the event date and cutoff time (as previously entered by the sports wagering computer system), the event (e.g. team names and team identifications), and the event results/winners.

3. Futures reconciliation report which lists the amount of, by date of the event for today and future event dates: wagers written on previous days (previous writes), wagers written today on future events (write today for future write), wagers written on previous days refunded today (previous canceled today), wagers written on previous days for today's event (future back-in), and total remaining wagers written for events in the future (net write).
4. Futures back-in ticket detail report, which lists the tickets written on previous days for events occurring today, by event, including ticket number, ticket description and date of event. The report lists the total amount of wagers written on previous days for today's event.
5. Future ticket detail report which lists the ticket written on previous days and today for events in the future, by date of event/by event, including: the ticket number, ticket description, and date of event. The future tickets detail report list totals of the amount of wagers by date of event, by event for all tickets.
6. Unpaid winners detail ticket report which lists the unexpired winning tickets that have not been paid including: the event date, ticket number, ticket description, amount to be paid, payout amounts in total.
7. Unredeemed voucher detail report, which lists the unexpired vouchers that have not been redeemed including: the voucher number, date of issuance, and amount of voucher, and vouchers in total. (Tickets and vouchers expire when the period the retail sports betting operator will honor winning wagers/vouchers has elapsed from the date of event.)
8. Purge detail report which lists expired, winning tickets that have not been paid, by ticket number, including the event date, ticket number, ticket description, and amount of payout.
9. Purge detail voucher report, which lists the expired vouchers that have not been redeemed including the voucher number, date of issue, and amount of voucher. The report lists total amount of vouchers to be added back into revenue.
10. Unpaid summary report which lists the amount of the beginning balance of unpaid tickets, previously unpaid tickets paid today, new unpaid tickets (i.e. unpaid ticket from event occurred today) and ending balance of unpaid tickets.
11. Voucher summary report, which lists the amount of the beginning balance of unredeemed vouchers, previously unredeemed vouchers, redeemed today, new unredeemed vouchers (i.e., vouchers issued today and remain unredeemed) and ending balance of unredeemed vouchers. The beginning balance is not required

to be listed on the report if the previous day's ending balance of unpaid/unredeemed is available.

12. If applicable, daily wagering account detail report and daily wagering account summary reports. Requirements will be detailed prior to the use of wagering accounts.

21-16. *Information to be Displayed/Provided.* A retail sports book operator shall provide for the prominent display of the following information at the retail sports book operation:

- a. The full name of the retail sports book operator and, as applicable, the retail sports betting operator's address from which it carries on business
- b. The Facility License issued by the Gaming Commission
- c. A statement that persons under the age of eighteen (18) are not permitted to engage in retail sports wagering

21-17. *Risk Management.* A retail sports betting operator shall implement risk management procedures. Such procedures may be provided in-house or by an independent third party.

- a. A retail sports betting operator's procedures shall contain a description of its risk management framework, including but not limited to:
  1. Automated and manual risk management procedures
  2. User access controls for all retail sports book employees
  3. Information regarding segregation of duties
  4. Information regarding fraud detection
  5. Controls ensuring regulatory compliance
  6. Description of anti-money laundering compliance standards that are compliant with [Gaming Commission Regulation – Chapter 11](#) and the gaming operation's approved AML/CFT program
  7. Description of all software applications that comprise the retail sports wagering system
  8. Description of all types of wagers available to be offered by the retail sports wagering system
  9. Description of all integrated third-party systems
  10. Any other information required by the Gaming Commission

21-18. *Integrity Monitoring.* A retail sports betting operator shall implement integrity monitoring procedures. Such procedures may be provided in-house or by an independent third party.

- a. A retail sports betting operator shall file as soon as reasonably possible, but in no more than twelve (12) hours, an integrity alert report detailing the suspicious activity with:
  1. Other sports wagering suppliers or retail sports betting operators
  2. The Gaming Commission
  3. Applicable sport's governing bodies/leagues
- b. A retail sports betting operator must submit a quarterly report to the Gaming Commission detailing its integrity monitoring services and summarizing any unusual betting activity or suspicious activity notification issued during that period. The quarterly report shall still be submitted if no unusual or suspicious betting activity is observed.
- c. A retail sports betting operator receiving a report of unusual betting activity or suspicious activity is permitted to suspend wagering on events related to the report and may also cancel related wagers pursuant to procedures previously approved by the Gaming Commission.
- d. A retail sports betting operator shall provide the Gaming Commission with access to its integrity monitoring system which shall provide at a minimum:
  1. All reports on unusual betting activity
  2. If the activity was determined to be suspicious
  3. The actions taken by the retail sports betting operator
- e. The retail sports betting operator shall implement procedures to identify wagers which may indicate cheating, manipulation, interference with the regular conduct of sport, or violations of the integrity of any sport on which wagers are made.
- f. If the retail sports betting operator receives notice of suspicious activity from another property, they must respond within twelve (12) hours to confirm or deny similar betting trends and activity.
- g. In the event of generating or receiving an alert, the retail sports betting operator affected shall maintain all relevant information regarding the bet and the bettor.

- h. Information contained in alerts may be shared with law enforcement, sport's governing bodies, or other entities as deemed necessary by the Executive Director to maintain the integrity of wagering at the licensed gaming operation. The retail sports betting operator and all its employees shall maintain the confidentiality of the information provided unless disclosure is required by the Gaming Commission or court order.
- i. The Gaming Commission may impose any additional conditions reasonably necessary on a retail sports betting operator to address risks to the integrity of sport and sports betting.

21-19. *Records/Date Retention Requirements.* Retail sports book operators shall create and maintain the records and reports required by this regulation in such a manner and using such forms as the Gaming Commission may require or approve. The Gaming Commission may require retail sports betting operators to create and maintain such other records and reports as necessary or convenient for strict regulation of retail sports betting. Except as otherwise provided in this regulation, a retail sports betting operator shall preserve the records required by this regulation for no less than five (5) years after they are made.