

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

Chapter 4 - Notifications and Reports

Section 1. Purpose; Authority

- 1-1. *Purpose.* The purpose of this Chapter is to ensure delivery of incident and statistical reports by each gaming operation to the Gaming Commission which are required by applicable internal control standards or regulation, or which will otherwise assist the Gaming Commission in performing its regulatory responsibilities.
- 1-2. *Authority.* These rules and regulations are issued under and pursuant to the authority of the Gaming Ordinance #10-400-01, Gaming Commission Ordinance #04-400-04, and Commission's Ordinance #04-150-01.

Section 2. Definitions

- 2-1. *General.* For purposes of this regulation, certain terms are defined in this section. The word "shall" is always mandatory and not merely advisory. Unless defined elsewhere, terms defined in this chapter, the Gaming Ordinance, and Gaming Commission Ordinance are defined for the purposes of all Gaming Commission regulations.
- 2-2. *Licensed Employee* means any gaming operation employee who has received a license from the Gaming Commission.
- 2-3. *Notification* means written notice, fax, or other electronic transmission notification required by these regulations is provided:
 - a. To the Gaming Commission by delivery to the Gaming Commission; or
 - b. To the General Manager of the gaming operation unless the Gaming Commission is notified in writing of a specific employment position which is responsible for accepting notices and reports on behalf of the gaming operation and in which case both would be notified.
- 2-4. *Report* means a document containing information organized in a narrative, graphic, or tabular form, prepared on or ad hoc, periodic, recurring, regular, or as required basis. Report may refer to specific periods, events, occurrences, or subjects, and may be communicated or presented in oral or written form.
- 2-5. *Sender* means any person or entity that is sending any document, report or communication via hard copy or electronic transmission.

- 2-6. *Slot Conversion* means the alteration, re-programming or replacement of a gaming machine game program EPROM or other equivalent game software media to change the game program or denomination of any gaming device.
- 2-7. *Gaming Device Change* means the physical replacement of a gaming device with a new machine or movement of a gaming device to a new location on the floor of a gaming operation.
- 2-8. *Gaming Device Upgrade* means the replacement of gaming device software with a newer version of the same software; this does not change game theme, payout or game operation.
- 2-9. *Enforcement Action* means any action taken by the Gaming Commission to ensure compliance with applicable laws, rules, regulations, and orders.

Section 3. Submission of Required Notifications and Reports

- 3-1. Notifications and reports must be delivered to the Gaming Commission. During non-business hours of the Gaming Commission, the notifications and reports shall be placed in the mailbox outside the Gaming Commission office unless delivered electronically.
- 3-2. It is the responsibility of the sender to verify the delivery/receipt of any electronically delivered report, document, or communication to the Gaming Commission.

Section 4. Slot Notifications

- 4-1. *Slot Device Change*
 - a. Prior to moving any gaming device to a new location on the gaming floor of any gaming operation or changing the orientation of a gaming device, a representative of the gaming operation shall provide twenty-four (24) hours' notice to the Gaming Commission.
 - b. The notification to the Gaming Commission must include a complete list of the gaming devices proposed to be moved or re-positioned, including the number assigned to such gaming device(s) and the proposed new location(s).
 - c. Prior to any software upgrades, a representative of the gaming operation shall provide twenty-four (24) hours' notice to the Gaming Commission.
- 4-2. *Replacement of Gaming Device; Addition of New Gaming Device*

- a. Prior to replacing any gaming device on the gaming floor or adding a new gaming device to the gaming floor, a representative of the gaming operation shall provide five (5) calendar days' notice to the Gaming Commission.
- b. The notification to the Gaming Commission must include a list of the gaming device(s) proposed to be replaced, including the number assigned to such gaming device(s), the location(s) of such gaming device(s), the theme of the new gaming device, the manufacturer, par sheets, specific pay table identification, approval letters, software type, software number(s) and any other information requested by the Gaming Commission or its staff.

4-3. *Gaming Device Conversion*

- a. Prior to conversion of any gaming device game or denomination conversion, a representative of the gaming operation shall provide five (5) calendar days' notice to the Gaming Commission.
- b. The notification to the Gaming Commission must include a list of the gaming device(s) proposed to be converted, including the number assigned to such gaming device(s), the location(s) of such gaming device(s), the name of the new game, the manufacturer, par sheets, specific pay table identification, approval letters, software type, software number(s) (if applicable) and any other information required by the Gaming Commission or its staff.

Section 5. Table Games Notifications

5-1. *New Table Games.* Before any new table game is introduced at a gaming operation, management of the gaming operation must complete the following requirements:

- a. An Agenda Request seeking approval must be submitted to the Gaming Commission not less than twenty (20) calendar days prior to the proposed start date.
- b. All proposed rules and procedures must accompany the agenda request submission.

5-2. *Table Moves and Layout Changes.* Before any existing table game is moved to a new location on the gaming floor, or a table layout changed, the Gaming Commission must have received not less than twenty-four (24) hours' advance notice. The Gaming Commission must also verify appropriate surveillance coverage prior to the game re-opening.

Section 6. Camera Coverage Notifications

- 6-1. *Existing Camera Coverage.* The gaming operation shall provide the Gaming Commission with no less than (3) calendar days advance notice for requests to remove, reset, or change existing camera coverage.
- 6-2. *New Camera Coverage in Existing Gaming Areas.* The gaming operation shall provide the Gaming Commission no less than fourteen (14) calendar days advance notice for requests for new coverage with the understanding that gaming activity cannot go live until all required equipment is in place and operational.
- 6-3. *New Camera Coverage for Expansion of Gaming Areas.* The gaming operation shall provide the Gaming Commission with no less than nine (9) months advance notice (including all information necessary to evaluate the project, gain necessary approvals, obtain funding (if applicable), and order/receive equipment) for the expansion of gaming into areas not equipped for gaming activity, including any renovations to the existing gaming facility. The Surveillance Manager or Surveillance Lead Technicians will keep gaming operation management updated on progress in terms of receipt and installation of equipment required to go live.
- 6-4. The gaming operation shall confirm with the Surveillance Department that any addition of signage, movement of gaming devices, or introduction of other equipment to the gaming floor does not inhibit current camera coverage and does not inhibit coverage once cameras are adjusted prior to the use of such items or equipment.

Section 7. Accounting and Auditing Reports

- 7-1. The gaming operation shall ensure that the Gaming Commission is provided copies of the following reports as prescribed below. Reports may be submitted in hard copy, electronically, or placed into a common folder with restricted access. Any common folder must be accessible by the Executive Director, Internal Audit Manager, Surveillance Manager, and Compliance Manager. The gaming operation shall also provide access to specific systems utilized by the gaming operation so that the Gaming Commission may download specific reports. If the Gaming Commission loses the ability to access the common folder or specific systems, the gaming operation shall be notified, and the delivery of the required reports shall be arranged.
- 7-2. The gaming operation shall keep the Gaming Commission informed of all external audits, reviews, and assessments to ensure the timely submission of required reports in 7-3 (c) (9).
- 7-3. The types of reports identified in this section are the more significant ones noted in the Tribal Minimum Internal Controls (TMICS); however, there are other reports that the TMICS require the gaming operation to generate and forward to the Gaming Commission. Required reports must be accessible and downloadable by

the Gaming Commission or submitted to the Gaming Commission. All required reports must be available or submitted by the listed time for receipt of report.

Report Type	Time for Receipt of Report
a. Security Incident Reports	Daily by 5:00 p.m. the following calendar day.
b. Variance Reports <ol style="list-style-type: none"> 1. Cage Variances (individual counts; reports of investigation of discrepancies) (TMICS 7-4 (c) and 20-3 (c)) 2. Slot Variances (including coin-to-drop meter reading vs. actual drop; actual currency drops vs. bill-in meter reading) (TMICS 6-9 (g) and 20-3 (b)) 3. Daily recap for table games (TMICS 20-3 (a)(3)) 4. **Investigation reports for variances or exceptions noted (TMICS 20-3 (a), (b), (c), and (f)) 	<p>Daily by 5:00 p.m. the following calendar day.</p> <p>**Within 24 hours of completed investigation.</p>
c. Accounting and Auditing Standards Reports <ol style="list-style-type: none"> 1. *Copy of the unaudited monthly financial statements 2. *Copy of the gaming operation's credit card activity 3. *Unclaimed jackpot reports 4. *Statistical reports from evaluation of theoretical vs. actual hold percentages for electronic games (TMICS 6-8) 5. *Analysis of table games performance standards (TMICS 5-7) 6. ***Minimum Bankroll Calculation and support (TMICS 7-4 (d), 15-2 (b)(11), and 20-3 (i)(2)) 7. ***Non-Gaming complimentary reports 8. ****Copy of all external audits, reviews, and assessments, including the 401K audit and Title 31. 9. *Other reports required by the TMICS 20-3, Tribal and/or Federal Regulations, or the Tribal-State Compact 	<p>Daily by 5:00 p.m. the following day.</p> <p>*Monthly (by the 21st of the following month).</p> <p>***Quarterly (by the 25th of January, April, July, and October.</p> <p>**** Within 24 hours of receipt.</p>
d. Daily Operating Report (DOR)	Daily by 5:00 p.m. the following calendar day.
e. Personnel Action Reports involving the following: <ol style="list-style-type: none"> 1. Suspension of any employee 	As generated by 5:00 p.m. the first calendar day following action.

2. Termination (voluntary or involuntary) of any employee 3. Title change of any employee 4. *Employee Roster	*Monthly (on or before the last Friday of each month).
f. Updated Slot Floor Plan	Monthly (on or before the 1 st Friday of each month).
g. Gaming Operation Issued Exception Notices 1. Compliance 2. Revenue Audit	Monthly (on or before the 15 th of each month).
h. Currency Transaction Reports (CTR)	As generated by 5:00 p.m. the first calendar day following generation.
i. Suspicious Activity Reports (SAR)	As generated by 5:00 p.m. the first calendar day following generation.
j. Vendors 1. *Full and Current list of all vendors (including unlicensed vendors) conducting business with the gaming operation	* Monthly (on or before the 19 th of each month).
k. Verification of Payments Verification that required payments have been submitted to National Indian Gaming Commission (NIGC), the State of Michigan (per the Tribal-State Compact), and local municipalities	As generated by 5:00 p.m. the first calendar day following generation.
l. Health & Safety Inspection Reports 1. *External Reports 2. ** Internal Reports	* Within 24 hours of receipt. ** Within 24 hours of generation.
m. External Enforcement Actions 1. Internal Revenue Service 2. State of Michigan 3. Any other external regulatory agency	Within twenty-four (24) hours of receipt of any enforcement action.
n. Committee Meeting Minutes 1. Comp Committee 2. SAR Committee 3. Credit Committee	Within twenty-four (24) hours of approval by the Committee.

Section 8. Required Notification to the Gaming Commission

8-1. A representative of the gaming operation shall notify the Gaming Commission's Surveillance Department immediately for any of the following events. For purposes

of this section, the term “immediately” means verbal notification (via radio or telephone) as soon as practical.

- a. A payout and/or jackpot of \$1,200.00 or greater from any gaming device.
- b. A payout and/or jackpot of \$10,000.00 or greater from any table game.
- c. All jackpots of \$50,000.00 or greater from any a gaming device or table game. The Gaming Commission’s Compliance Department **shall** verify the jackpot **before** a gaming operation can pay out any such jackpot.
- d. Accident or other incident resulting in damage to gaming equipment or electronic data processing (EDP) equipment used in connection with gaming operation.
- e. The arrest of any person at the gaming operation.
- f. If an outside law enforcement agency is on property.
- g. Failure of the slot accounting system, progressive system, or power failure.
- h. Restriction of a former or current employee of the gaming operation.
- i. Any suspicious or suspected criminal activity.

Section 9. Job Descriptions

- 9-1. The Human Resources Department shall forward to the Gaming Commission a copy of all job descriptions and organizational charts related to the structure of the gaming operation **as generated**, modified or discontinued.

Section 10. Dealer School

- 10-1. The gaming operation shall provide the Gaming Commission with no less than sixty (60) calendar days advance notice of the start date of a Dealer School.

Section 11. Violations of the Rules

- 11-1. Failure of a gaming operation to comply with this regulation may result in the initiation of action under Little River Band of Ottawa Indians Gaming Commission Regulations –Chapter 10 – Compliance and Enforcement.