



Mille Lacs Band of Ojibwe Indians  
*Gaming Regulatory Authority*  
*Detailed Gaming Regulations*

**MAIN BANK AND CAGE CONTROLS**

**Document No. DGR – 15**

**Effective: December 17, 2013**

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- I. SCOPE.** This document includes the Detailed Gaming Regulations for Main Bank and Cage to be regulated and conducted in compliance with Title 15 of the Mille Lacs Band Statutes Annotated.
- II. GAME REGULATIONS APPLICABLE TO MAIN BANK AND CAGE.** A Gaming Enterprise shall comply with all requirements set forth in the Tribal-State Compacts, applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations.
- Section 1.** The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.
- Section 2.** Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation.
- Section 3.** The GRA reserves the right to require changes to any internal control or procedure to ensure compliance with applicable laws and regulations.
- III. SUPERVISION.** Supervision must be provided as needed for cage, vault, kiosk and other operations.
- IV. COMPUTER APPLICATIONS.** For any computer applications utilized, alternate documentation and procedures that provide at least the level of control described by the standards in this regulation will be acceptable. Any such documentation and procedures requires GRA Board approval prior to implementation.
- V. PERSONAL CHECKS, CASHIER'S CHECKS, TRAVELER'S CHECKS, PAYROLL CHECKS AND COUNTER CHECKS.**
- Section 1.** If personal checks, cashier's checks, traveler's checks, payroll checks, or counter checks are cashed at the cage, controls must be implemented that provide for security and integrity. For each check cashing transaction, the cage cashier shall:
- A. Verify the patron's identity by examining identification or other method. The identification information must be documented on the check unless the information is maintained elsewhere. In such cases, record "account on file" on the check as the verification source and results.
  - B. Examine the check to ensure it includes the patron's name, current address and signature.
  - C. For personal checks, verify the patron's check cashing authority and record the source and results in accordance with management policy.
  - D. A reasonable effort must be made to verify the business authenticity of payroll checks and the authenticity of cashier checks.
  - E. If a check guarantee service is used to guarantee payment and the procedures required by the check guarantee service are followed, then the above requirements do not apply.
- Section 2.** When counter checks are issued, the following must be included on the check:
- A. The patron's name and signature;
  - B. The dollar amount of the counter check (both alpha and numeric);
  - C. Patron's bank name, bank routing and account numbers;
  - D. Date of issuance; and
  - E. Signature of the associate approving the counter check transaction.



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**Section 3.** When traveler's checks or other guaranteed drafts such as cashier's checks are presented, the cashier shall comply with the examination and documentation procedures as required by the issuer.

**Section 4.** All checks must be deposited in the normal course of business, as established by Gaming Enterprise management.

**VI. SAFE DEPOSIT BOXES.**

**Section 1.** The issuance and closure of a patron's deposit box in the cage must be evidenced by a document that includes the following information:

- A. Safe deposit box number;
- B. Date of issuance and closure;
- C. Patron's name and signature;
- D. Type of identification, identification number, expiration date of identification, and date identification was examined. The patron's driver's license is the preferred method of verifying patron identity. A passport, government issued identification, non-resident alien identification card, or another picture identification normally accepted as a means of identification when cashing checks, may also be used; and
- E. Associate's name and signature that issued or closed the safe deposit box.

**Section 2.** Procedures must be established to maintain a detailed record of all cage/vault safe deposit boxes and the current status of each box (i.e. issued, not issued).

**Section 3.** The preceding procedures for maintaining accurate records on the issuance and closure of safe deposit boxes must also be adhered to in non-gaming areas.

**VII. CAGE AND VAULT ACCOUNTABILITY STANDARDS.**

**Section 1.** The Gaming Enterprise shall establish and comply with procedures that include:

- A. All transactions that flow through the cage must be summarized on a cage accountability form for each of the cage's shifts and must be supported by documentation.
- B. Increases and decreases to the total cage inventory must be supported by documentation. For any individual increase/decrease which exceeds \$100.00, documentation must include:
  1. Date and shift;
  2. Purpose of the increase/decrease;
  3. Associate(s) completing the transaction; and
  4. Associate or department receiving the cage funds (for decreases only).
- C. The cage and vault (including coin room) inventories must be independently counted by at least two (2) associates, attested to by signature, recorded in ink or some other permanent form, at the beginning and end of each active shift. These associates shall make individual counts to compare for accuracy and maintenance of individual accountability. The operation must establish, as approved by the GRA Board, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented. The results of any such investigation must be provided by email to GRAOGRnotifications@grcasinos.com.
- D. The type of transactions to be performed by each of the casino cashiering areas.
- E. The even exchange of funds between two (2) casino cashiering areas or between a casino cashiering area and token or change banks, which must include the following:



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1. A designation of the associates who may process the even exchange transaction;
  2. A description of the even exchange form and the required information and signatures. This form should be at least a two (2) part form;
  3. A description of the distribution of each part of the form;
  4. Types of items allowed to be exchanged; and
  5. Requirement that Security associates must accompany the transfer of funds between locations at an amount determined by management.
- F. The control of ATMs, kiosks, and cash-out ticket redemption machines by the main bank or vault. Such procedures must at minimum include:
1. Description of procedures for bringing machines back to imprest amounts; and
  2. Designation of the associates who shall keep machines at imprest amounts.
- G. The preparation and deposit of funds to the bank. Such procedures must at minimum include:
1. Preparation and verification of cash and coin;
  2. Procedures for mutilated money;
  3. Verification of checks;
  4. Security escort; and
  5. Even exchange procedures between bank and enterprise.

**Section 2.** Each Gaming Enterprise shall establish and comply with a minimum bankroll formula to ensure each Gaming Enterprise maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the Gaming Enterprise's patrons as they are incurred. Such formula must include at minimum:

- A. Cash available;
- B. Required bankroll;
- C. Per gaming area requirements; and
- D. Variable amounts requirements.

**VIII. CHIP AND TOKEN STANDARDS.**

**Section 1.** The Gaming Enterprises shall establish and comply with procedures for the purchase, receipt, inventory, storage and destruction of gaming chips and tokens. Such procedures must include at minimum:

- A. Associates involved;
- B. Notification of Surveillance and OGR&C;
- C. Inspection; and
- D. Verification.

**IX. PROMOTIONAL PAYOUTS, DRAWINGS AND GIVEAWAY PROGRAMS.** These standards apply to any payout resulting from a promotional payout, drawing or giveaway program (i.e. paycheck wheels) disbursed by the Cage Department or any other department payouts. This does not apply to payouts for card game promotional pots and pools.

**Section 1.** Payouts of \$100.00 or more must be documented at the time of the payout. Documentation must include the following:

- A. Date and time;
- B. Dollar amount of payout or description of personal property;
- C. Reason for payout (i.e. name of promotion);



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- D. Patron's name and confirmation that identity was verified (drawings only);
- E. Signature(s) of the following associates verifying the promotional payout with the patron:
  - 1. Two (2) associate signatures for all payouts of \$100.00 or more; or
  - 2. For computerized systems that validate and print the dollar amount of the payout on a computer-generated form, only one associate signature is required on the payout form.
- F. The required documentation may be prepared by an associate who is not a cage department associate as long as the required signatures are those of the associate(s) completing the payout with the patron.

**Section 2.** For payouts that are less than \$100.00, documentation must be produced to support the cage accountability. Such documentation may consist of a line item on a cage accountability form (i.e. "25 \$10.00 cash giveaway coupons = \$250.00).

**X. CAGE/VAULT ACCESS AND EXTRANEIOUS ITEMS.**

**Section 1.** Each Gaming Enterprise shall establish and comply with procedures that restrict physical access to cage associates, designated staff and other authorized persons.

**Section 2.** Each Gaming Enterprise shall establish and comply with procedures to address the transporting of extraneous items, such as personal belongings, tool boxes, beverage containers, boxes, etc. into and out of the cage, coin room, count room and/or vault. At minimum, the procedures must address:

- A. Specifically what items are allowed;
- B. Designated locations for extraneous items;
- C. Surveillance notification (including when Surveillance must be notified prior to the introduction or removal of extraneous items);
- D. Access to personal items during shift; and
- E. Security checks of items that are not easily visible to Surveillance (i.e. boxes, garbage, etc.).

**XI. UNIFORMS.**

**Section 1.** Each Gaming Enterprise shall establish and comply with policies regarding proper uniforms in the cage, coin, vault, cashier booths and/or coin rooms. Such policies must address at minimum:

- A. Areas that require clothing that either has no pockets or pockets are sewn shut;
- B. Areas that require wearing of aprons; and
- C. Wearing of jackets or sweaters.

**History.** Approved by the Gaming Regulatory Authority on April 8, 2011. **Effective date April 8, 2011.**

Changes to grammar and formatting where applicable. Change "shall" to "must" where applicable. Change "employee" and "person" with "associate" where applicable. Change "customer" to "patron" where applicable. Change "and/or" to "and" where applicable. Part I: added SCOPE. SCOPE. This section includes the Detailed Gaming Regulations for Main Bank and Cage to be regulated and played in compliance with Title 15 of the Mille Lacs Band Statutes Annotated. Part II: added GAME REGULATIONS APPLICABLE TO MAIN BANK AND CAGE. A Gaming Enterprise shall comply with all requirements set forth in the Tribal-State Compacts, applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations. Section 1. The Gaming Enterprise shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board. Section 2. Subsequent revisions to the SICS must be provided to the GRA 30 days prior to implementation of revision. Section 3. The GRA reserves the right to require changes to any internal control or procedure to ensure compliance to applicable laws and regulations. Part III: added SUPERVISION. Supervision shall be provided as needed



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for cage, vault, kiosk, and other operations. Part IV: replaced “section” with “regulation” before will Part V Section 1: added “, controls must be implemented that provide for security and integrity.” after cage Part V Section 1(D): removed “It is recommended that” before A; added “must” before be Part V: added Section 4: All checks shall be deposited in the normal course of business, as established by Gaming Enterprise management. Part III. CUSTOMER DEPOSITED FUNDS. (original): removed from DGR 15 Part VII Section 1(C): added “independently” before counted; replaced “individuals” with “associates, attested to by signature, recorded in ink or some other permanent form,” after two; replaced “work” with “active” before shift; replaced “for comparison” to “to compare” after counts; replaced “Such counts shall be recorded at the beginning and end of each shift during which activity took place. All discrepancies shall be noted and investigated. The results of any such investigation shall be reported to the OGR&C.” with “The operation must establish, as approved by the GRA Board, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented. The results of any such investigation must be provided by email to GRAOGRnotifications@grcasinos.com.” Part VII Section 1(F)(1) and (2): replaced “imprest” with “imprest” before amounts. Part VIII Section 1: added “purchase,” before receipt Part VIII Section 1(B): replaced “procedures” with “of Surveillance and OGR&C” after Notification Part VII Section 1(C) and (D): removed “procedures” Part IX: replaced “Such payouts are associated with gaming activity or a promotional program to encourage customer participation in gaming activities. However this section does not apply to programs that are addressed elsewhere in this regulation.” with “or any other department payouts. This does not apply to payouts for card game promotional pots and/or pools.” after department Part IX: original document Section 1(A): The conditions for participating in promotional payouts, including drawings and giveaway programs, shall be prominently displayed or available for customer review at the Gaming Enterprise.” was removed. Part IX Section 1(B): removed “(i.e. car)” Part IX Section 1(D): added “and confirmation that identity was verified” after name Part IX Section 1(E): replaced “number of employees” with “associates” after following Part IX Section 2: replaced “document” with “form” after accountability Part X: added “CAGE/VAULT ACCESS AND” to title Part X: added Section 1 Each Gaming Enterprise shall establish and comply with procedures that restrict physical access to cage associates, designated staff and other authorized persons. Part X Section 2: replaced “coats, purses and/or” with “personal belongings, tool” before boxes; added “beverage containers, boxes, etc.” after boxes Part X Section 2(C): replaced “, (which shall include)” with “(including)” before when Part XI Section 1: replaced “shall include” with “must address” after policies

**Each Gaming Enterprise shall come into compliance with changes no later than October 1, 2014.  
Each Gaming Enterprise may petition the GRA Board for an extension of up to six (6) months.  
Approval of an extension is discretionary.**