



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Office of Gaming Regulation and Compliance

August 24, 2023

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 305(b)(2), this serves as the official Notice of Adoption the following:

Changes to:
DETAILED GAMING REGULATION – 10 Standards for Table Games

Summary of changes, minor edits to DGR-10 Standards for Table Games include:

1. General reformatting of sections
2. Enhanced and expanded table game software standards
3. Enhanced and expanded fill and credit standards
4. Addition of opening and closing procedures
5. Enhanced and expanded playing card standards, including incorporation of 4th Technical Amendment to Blackjack Compact language
6. Addition of shuffler standards
7. Addition of rules of play and game play options standards, including incorporation of 4th Technical Amendment to Blackjack Compact language
8. Addition of table games protection standards
9. Addition of standards for progressive and promotional pools and pots

Pursuant to 15 MLBSA § 305(b)(3): The GRA reviewed the comments received during the comment period, beginning June 8, 2023, and closing July 10, 2023. The GRA hereby responds to comments below and makes changes as applicable.

Comment 1: Request change to (1.1.4) “at least one pit boss or floor supervisor for every two open tables where the maximum bet is greater than or equal to \$200, changed to \$500. Change declined.

- Agree with recent technical amendment, this limit is determined by the Band. Given the recent card-handling and compliance issues that have occurred over the past several months, the GRA feels it is advisable to maintain the additional oversight that comes with lower limits. Tables to supervisor ratios can be revisited later after a substantial period of successful card-handling compliance is demonstrated.

Comments 2/3: Add “and/or cash equivalents” to Section 3.2. Note: Chips (free play promo chips) may not be redeemable for cash but do have value and should be accounted for. Change accepted.

- 3.2.1: Chips, tokens, and/or cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit slips.
- 3.2.5: Chips, tokens, and/or cash equivalents for fills or credits shall be broken down and verified by the dealer in public view prior to placing the fills in the table tray or placing the credit in racks for transfer to the cage.

Comment 4: Add “Cheques” to Table Games Inventory Standards, Section 4. Note: Chips (free play promo chips) may not be redeemable for cash but do have value and should be accounted for. Change accepted.

- 4.1.1: The table's cheques, chips, tokens, and coins inventory shall be counted and recorded on a table inventory form either electronically or manually.

Comment 5: Add "ensuring all cards are present and not marked or damaged" to Table Opening and Closing Procedures to Section 5. Floor person is also responsible for entire inspection. Changes accepted.

- 5.1.1: After receiving one or more decks of cards at the table, the dealer shall sort and inspect the cards to make sure they are not damaged or marked and all cards are present. A pit boss or floor person shall observe the entire inspection and is also responsible for ensuring the integrity of the decks.
- 5.1.4: Added, "Dealer and Pit boss or floor person must sign table inventory sheet to attest to accuracy."

Comment 6: Add "Cheque" to what the dealer counts, and supervisor observes. Change accepted.

- 5.2.1: The dealer shall count, and the supervisor shall observe in its entirety, the table's cheques, chips, tokens and coins and record either electronically or manually.

Comment 7/8/9: Add "verify all cards are present" to internal controls for closing a table game. Change accepted. Change floor person to supervisor. Change declined, will use Compact language: "pit boss and floor supervisor". Change accepted to add the option for mechanical inspection to verify the cards are all present and also an option for if the cards cannot be sorted and verified immediately.

- 5.2.2: The dealer shall sort manually or mechanically and inspect the cards to verify all cards are present or follow procedures to verify later, all as approved by the GRA. The floor person assigned to the table shall observe the entire inspection and is also responsible for ensuring the integrity of the decks.
- Will use compact language of "pit boss and floor supervisor".

Comment 10: Change from order to "ordering". Change accepted.

- 6.1.1.a: Ordering of playing cards including:

Comment 11: Replace and with "and/or". Change accepted.

- 6.1.3.b: Two associates, one from a department other than table games, shall be involved with the scoring, cancelling and/or destroying of used playing cards

Comment 12: Request to remove, "Used, cancelled, or scored cards are prohibited from being sold, donated, or used for marketing purposes." (6.2) Change declined.

- The risk of selling and/or donating cards is too high and the proposed change is not accepted.

Comment 13: Add "security cover" to "Continuous shufflers, if used, shall include a brush to protect the confidentiality of the cards." Change accepted.

- 7.3: Continuous shufflers, if used, shall include a brush or a security cover to protect the confidentiality of the cards.

Comment 14: Remove "to" from sentence. Change accepted:

- 7.7: At any time when all players leave a table and prior to play resuming, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. Upon request by the first player or players, the cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence.

Comment 15: Add or cash equivalent approved by the Band to "Cash may be accepted provided that the acceptance of cash is limited to an exchange of cash for chips and is confirmed by the dealer and a pit supervisor associate. Change accepted and addition of debit card SICS:

- 7.8.5: Cash or cash equivalent as approved by the GRA may be accepted provided that the acceptance of cash is limited to an exchange of cash for cheques and is confirmed by the dealer and a pit supervisor associate.

- 7.8.6: Minimal SICS requirement for Debit Cards added and remainder of section renumbered by 1 digit.

Comment 16: Request to remove “Fees must not be placed in the drop box or commingled with gaming revenue from table games unless an automated system is used to track the contributions.” Change declined.

- 7.8.8: Will remain as-is, otherwise detecting anomalies would be nearly impossible. Risk of obscuring theft is too great, not to implement this basic internal control.

Comment 17: Request to change \$200 to \$500, “If the maximum bet at any given table is changed to greater than or equal to \$200 during the gaming day, Surveillance shall be notified.” Change declined.

- 7.8.9.d: Agree with recent technical amendment, this limit is determined by the Band. See comment #1: In light of on-going card handling issues, the limit will stay \$200 until there has been a substantial demonstrated period where card-handling issues and compliance with SICS are rectified. Until those issues are addressed in full, the risk of changing this supervisor to table ratio is too high and proposed change is not accepted.

Comment 18: Renumber the last 7.8.13 to 7.8.14: The Gaming Enterprise shall develop internal controls governing placement of a player on special rules which include at minimum: Change accepted, everything in 7.8. has been renumbered after 7.8.5 to accommodate debit card SICS.

- 7.8.15: The Gaming Enterprise shall develop internal controls governing placement of a player on special rules which include at minimum:

Comment 19: Change to (8.4.1.c) “A player splitting aces shall only have one card dealt to each ace and may not elect to receive additional cards.” Change declined.

- Note: Our interpretation of this regulation allows for players to split as requested; change is unnecessary. Currently approved SICS already reflects this practice.

Comment 20: Add “cheques” to “Dealers shall not touch any chips on a dead game without a floor person present.” Change accepted.

- 9.1.8.c: Dealers shall not touch any chips or cheques on a dead game without a floor person present.
- 9.1.9: Added “without damage or markings” is now “If a card or cards leaves the table surface, cards should be verified to ensure all cards are accounted for without damage or markings.”

Comments 21/22: Add “cheques” to “Chip design and security features shall be submitted to the GRA for review and approval prior to purchase. When new gaming chips are purchased, they must contain a minimum of 1 security feature. such as a water mark, hologram, RFID, etc.” Change accepted.

- 9.1.10: “Chip and cheque design and security features shall be submitted to the GRA for review and approval prior to purchase. When new gaming chips are purchased, they must contain a minimum of 1 security feature, such as a water mark, hologram, RFID, etc.”
- The GRA cannot possibly account for all future security enhancements and will not adopt a new regulation every time there is new technology. Language was intentionally left open to accommodate forthcoming safety improvements. Change is declined.

Comment 23: Recommendation to separate progressive and promotional pools. Bulk of changes declined, 10.2.5 changed to assist with player pool liability concerns.

- Section 10.2.5.: The Gaming Enterprise, with approval from the GRA, will establish a ceiling amount for the player pool games. If the player pool reaches that amount, the Gaming Enterprise shall submit to the GRA a distribution proposal to return a portion of the funds to the players through promotion, award or prize.

- Note: We suggest submitting large enough of a ceiling or sliding scale (example \$xxx,xxx amount over liability) to fit your needs. You are setting the ceiling and what is included or not will be chosen by you, with GRA approval.

Comment 24: Recommendation to separate progressive and promotional pools. Changes declined.

- Section 10 will not be changed, including 10.4. and 10.5.
- Note: We do not interpret 10.4 to include regular card play.

Comment 25: Change to “Rules governing progressive pools and pots must be conspicuously posted or available in writing for patron review and must designate:” (10.6.) We disagree and believe rules posted for guest review eliminates confusion and potential guest disputes. Change declined.

- Section 10 will not be changed, including 10.6.
- Note: This is already being done at the tables and is a solid best practice.

Comment 26: Change chips to “cheques”: How the funds will be paid out (e.g., chips, cash, etc.). Change accepted.

- 10.6.3” How the funds will be paid out (e.g., cheques, cash, etc.).

Effective Date: December 31, 2023.

The GRA attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the GRA Office of Gaming Regulation & Compliance and at <https://millelacsband.com/government/indian-gaming-regulation/gaming-regulations-resolutions>



Gaming Regulatory Authority Board

8/24/2023

Date



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR-10 Standards for Table Games

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1. General Standards

- 1.1. A Gaming Enterprise shall comply with all requirements set forth in the Tribal/State Compact and all subsequent technical amendments governing blackjack.
- 1.2. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the GRA, shall be acceptable.
- 1.3. Pit boss or floor supervisors shall provide supervision of all table games.
- 1.4. At all times during the conduct of blackjack games the following staff must be present:
 - 1.4.1. At least one pit boss or floor supervisor for each open pit
 - 1.4.2. At least one pit boss or floor supervisor for each six tables or fraction of open tables
 - 1.4.3. At least one pit boss or floor supervisor for every two open tables which the cards are dealt by hand
 - 1.4.4. At least one pit boss or floor supervisor for every two open tables where the maximum bet is greater than or equal to \$200
 - 1.4.5. One dealer per open table
 - 1.4.6. At least one cashier

2. Table Game Software Standards

- 2.1. The Gaming Enterprise shall establish and implement procedures that restrict access to authorized employees for the controlled gaming equipment/components.
- 2.2. Any game software components must be submitted for testing and approval by an independent testing laboratory. The testing laboratory shall provide a formal written report setting forth and certifying its findings and conclusions and noting compliance with any applicable standard established by the GRA, tribal/state compact, and 25 CFR §§ 543 and 547.
- 2.3. The game software components shall be identified in the test laboratory report. When initially received, the software must be verified to be authentic copies, as certified by the independent testing laboratory.
- 2.4. The Gaming Enterprise shall establish and implement procedures relating to the inspection, shipment, testing, and documentation of gaming equipment/components.
- 2.5. Software must be authenticated prior to placement into play and semi-annually by an associate independent of Table Games operations by comparing signatures against the test laboratory letter on file with the GRA for that version.
- 2.6. The manufacturer must provide specialized equipment or the services of an independent technical expert to assist with the testing, examination, and analysis.

3. Fill and Credit Standards

- 3.1. Cheques, chips, tokens, and/or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit or marker transfer forms. Cross fills (the transfer of cheques/chips between table games) and even cash exchanges are prohibited in the pit. Computerized and manual fill and credit form standards shall include the following:

- 3.1.1. Fill slips and credit slips shall be in at least triplicate form, and in a continuous, pre-numbered series.
 - a. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time.
 - b. The alphabet need not be used if the numerical series is not repeated during the business year.
- 3.1.2. The following shall be noted on all copies of the fill/credit slips:
 - a. Table number
 - b. Shift
 - c. Amount of fill/credit by denomination
 - d. Amount of fill/credit in total
 - e. The correct date and time
- 3.1.3. Unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control.
- 3.2. The Gaming Enterprise shall develop a system of internal controls for computerized and manual fills and credits that include, but are not limited to the following:
 - 3.2.1. Cheques, chips, tokens, and/or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit slips.
 - 3.2.2. Table fill and credit transactions shall be authorized by pit supervisory personnel before the issuance of fill or credit slips and transfer of cheques, chips, tokens, or cash equivalents.
 - 3.2.3. The fill or credit request shall be communicated to the cage either electronically or with a manual request slip where the fill/credit slip shall be prepared.
 - 3.2.4. All fills/credits and associated cheques, chips, tokens or cash equivalents shall be carried by a person who is independent of the cage or pit.
 - 3.2.5. Cheques, chips, tokens, and/or cash equivalents for fills or credits shall be broken down and verified by the dealer in public view prior to placing the fills in the table tray or placing the credit in racks for transfer to the cage.
 - a. A copy of the fill/credit slip shall then be deposited into the drop box on the table by the dealer, where it shall appear in the soft count room with the cash receipts for the shift.
 - b. The part of the fill slip that is placed in the table game drop box shall be of a different color for fills than for credits, unless the type of transaction is clearly distinguishable in another manner (the checking of a box on the form shall not be a clearly distinguishable indicator).
- 3.3. The Gaming Enterprise shall develop a system of internal controls for computerized and manual fills that include, but are not limited to the following:
 - 3.3.1. At least three parts of each fill slip shall be utilized as follows:
 - a. One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, shall be deposited in the table game drop box.

- b. One part shall be retained in the cage for reconciliation of the cashier bank.
 - c. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it.
 - d. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
- 3.3.2. The fill slip shall be signed by at least the following persons (as an indication that each has counted the amount of the fill and the amount agrees with the fill slip):
- a. Cashier who prepared the fill slip and issued the cheques, chips, tokens, or cash equivalent
 - b. Runner who carried the cheques, chips, tokens, or cash equivalents from the cage to the pit
 - c. Dealer who received the cheques, chips, tokens, or cash equivalents at the gaming table
 - d. Pit supervisory personnel who supervised the fill transaction
- 3.4. The Gaming Enterprise shall develop a system of internal controls for computerized and manual credits that include, but are not limited to the following:
- 3.4.1. At least three parts of each credit slip shall be utilized as follows:
- a. Two parts of the credit slip shall be transported by the runner to the pit.
 - b. After signatures of the runner, dealer, and pit boss or floor supervisor are obtained, one copy shall be deposited in the table game drop box and the original shall accompany transport of the cheques, chips, tokens, markers, or cash equivalents from the pit to the cage for verification and signature of the cashier.
 - c. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it.
 - d. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
- 3.4.2. The credit slip shall be signed by at least the following persons as an indication that each has counted and verified the cheques/chips:
- a. Cashier who received the items transferred from the pit and prepared the credit slip
 - b. Runner who carried the items transferred from the pit to the cage
 - c. Dealer who had custody of the items prior to transfer to the cage
 - d. Pit supervisory personnel who supervised the credit transaction
- 3.5. The Gaming Enterprise shall develop a system of internal controls for computerized and manual fill/credit voids that include but are not limited to the following:
- 3.5.1. When a fill/credit slip is voided, the cashier shall clearly mark "void" across the face of the original and first copy.
- 3.5.2. The cashier and one other person independent of the transactions shall sign both the original and first copy.

3.5.3. Voids shall be submitted to the accounting department for retention and accountability.

4. Table Games Inventory Standards

- 4.1. At the close of each shift, for those table banks that were opened during that shift:
 - 4.1.1. The table's cheques, chips, tokens, and coins inventory shall be counted and recorded on a table inventory form either electronically or manually.
 - 4.1.2. If the table banks are maintained on an imprest basis, a final fill or credit shall be made to bring the bank back to par.
 - 4.1.3. If the table banks are not maintained on an imprest basis, beginning, and ending inventories shall be recorded on the master game sheet, either electronically or manually for shift win calculation purposes.
- 4.2. The accuracy of inventory forms prepared at shift end shall be verified by the outgoing pit boss or floor supervisor and the dealer.
 - 4.2.1. Alternatively, if the dealer is not available, such verification may be provided by another pit boss or floor supervisor.
 - 4.2.2. Verifications shall be evidenced by signature on the inventory form.
- 4.3. If inventory forms are placed in the drop box, such action shall be performed by a person other than a pit boss or floor supervisor.

5. Table Opening and Closing Standards

- 5.1. The Gaming Enterprise shall develop a system of internal controls for opening a table game, that include, but are not limited to the following:
 - 5.1.1. After receiving one or more decks of cards at the table, the dealer shall sort and inspect the cards to make sure they are not damaged or marked and all cards are present. A pit boss or floor supervisor shall observe the entire inspection and is also responsible for ensuring the integrity of the decks.
 - 5.1.2. After the cards are inspected, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table.
 - 5.1.3. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence.
 - 5.1.4. The dealer shall count, and the pit boss or floor supervisor shall observe in its entirety, the table's cheques, chip, token, and coin and record either electronically or manually. Dealer and Pit boss or floor person must sign table inventory sheet to attest to accuracy.
 - 5.1.5. Any differences between the closer and the opener shall be investigated and reported to Surveillance.
- 5.2. The Gaming Enterprise shall develop a system of internal controls for closing a table game, that include, but are not limited to the following:
 - 5.2.1. The dealer shall count, and the supervisor shall observe in its entirety, the table's cheques, chips, tokens, and coins and record either electronically or manually.

5.2.2 The dealer shall sort manually or mechanically and inspect the cards to verify all cards are present or follow procedures to verify later, as approved by the GRA. The pit boss or floor supervisor shall observe the entire inspection and is also responsible for ensuring the integrity of the decks.

5.2.3 The cards will be placed in a clear bag, sealed, and signed by the dealer and pit boss or floor supervisor.

6. Playing Card Standards

6.1. The Gaming Enterprise shall develop a system of internal controls for inventory of playing cards that include, but are not limited to the following:

6.1.1. Procedures for the inventory and tracking of all cards including:

- a. Ordering of playing cards including:
 - i. Notification to the GRA of card order
 - ii. Approval by the GRA for any changes to the design of cards
- b. Cards to arrive at the gaming location sealed and wrapped.
- c. Receipt of playing cards
- d. Storage of playing cards including:
 - i. Secure location of playing cards
 - ii. Procedures to prevent unauthorized access and to reduce the possibility of tampering
 - iii. Surveillance monitoring
 - iv. Storage room inventory procedures
 - v. Card room area storage procedures, including podium storage and number of decks to be in the podium at any one time
- e. Documentation requirements for a card control log, including:
 - i. When cards are received on site
 - ii. When cards are distributed to and returned from tables
 - iii. When cards are removed from play by the Gaming Enterprise

6.1.2. Procedures for the retention of playing cards when retained for investigation, including:

- a. Procedures for the playing cards to be retained intact
- b. Playing cards to be retained outside of the established removal and cancellation procedure
- c. Procedures for the documentation and inventory of playing cards retained for investigation

6.1.3. Procedures for the scoring, cancelling, and/or destruction of playing cards, including:

- a. Used cards shall be maintained in a secure location until scored, cancelled, and/or destroyed
 - b. Two associates, one from a department other than table games, shall be involved with the scoring, cancelling and/or destroying of used playing cards
 - c. Playing cards must be cancelled and/or destroyed within seven (7) days from removal of play, except when playing cards are retained for an investigation.
- 6.2. Used, cancelled, or scored cards are prohibited from being sold, donated, or used for marketing purposes.
- 6.3. Deck of cards used for training shall be:
 - 6.3.1. Of a different design from cards used for play
 - 6.3.2. Not maintained with decks of cards for play
- 6.4. Blackjack shall be played with at least one bordered or non-bordered deck of cards with backs of the same color and design and one colored cutting card.
- 6.5. For blackjack, the value of the cards contained in each deck shall be as follows:
 - 6.5.1. Any card from 2 to 10 shall have its face value
 - 6.5.2. Any Jack, Queen or King shall have a value of ten
 - 6.5.3. An ace shall have a value of eleven unless that would give a player or the dealer a score in excess of 21, in which case, it shall have a value of 1

7. Shuffler Standards

- 7.1. The gaming Enterprise shall develop a system of internal controls for card shufflers, including, but not limited to, procedures for:
 - 7.1.1. A shuffler indicating an error
 - 7.1.2. A shuffler indicating too many or not enough cards are present
 - 7.1.3. A card being jammed in a shuffler
 - 7.1.4. Replacing damaged cards
- 7.2. Card shufflers shall be affixed to the tables to the left of the dealer.
- 7.3. Continuous shufflers, if used, shall include a brush or a security cover to protect the confidentiality of the cards.
- 7.4. The Gaming Enterprise shall develop a system of internal controls for the shuffling and cut of cards that include, but are not limited to the following:
 - 7.4.1. Immediately prior to commencement of play and after any round of play the dealer shall shuffle the cards so that they are randomly intermixed.
 - 7.4.2. The Gaming Enterprise shall develop procedures for a house shuffle.
 - 7.4.3. The Gaming Enterprise shall define situations for when a reshuffle is to be initiated.

- 7.4.4. After the cards have been shuffled, the dealer shall offer the stack of cards, with backs facing away from him/her to the players to be cut.
- a. The player or the dealer shall cut the cards by placing the cutting card in the stack at least 10 cards in from either end.
 - b. The player to cut the cards shall be:
 - i. If the game is just beginning, the first player to the table shall cut the cards.
 - ii. If the table game has been in play:
 - (1) The player to cut the cards shall be the player on whose box the cutting card appeared during the last round of play.
 - (2) If the cutting card appeared on the dealer's hand during the last round of play, the player at the farthest point to the right of the dealer shall cut the cards.
 - iii. If a reshuffle is initiated by the casino, the player at the farthest point to the right of the dealer shall cut the cards.
 - iv. If a player refuses the cut, the cards shall be offered to each other player moving clockwise around the table until a player accepts the cut.
 - v. If no player accepts the cut, the dealer shall cut the cards.
- 7.5. The Gaming Enterprise shall develop a system of internal controls for dealing the cards that include, but are not limited to the following:
- 7.5.1. Procedures for dealing cards from a shoe, including, but not limited to the following:
- a. All cards used shall be dealt from a multideck dealing shoe specifically designed for such purpose.
 - b. The shoe shall be located on the table to the left of the dealer.
 - c. The discard rack shall be located on the table immediately to the right of the dealer.
 - d. Each dealer shall remove cards from the shoe:
 - i. With his/her left hand
 - ii. Turn the cards face upwards
 - iii. Place the cards on the appropriate area of the layout with his/her right hand, except the dealer has the option to deal hit cards to the first two positions with his/her left hand
 - e. The dealer shall remove the first card from the shoe face downwards and place the card in the discard rack in the following situations:
 - i. After each full set of cards is placed in the shoe
 - ii. When each new dealer who comes to the table prior to the new dealer dealing any cards to the players
 - f. The first card which has been placed face down in the discard rack, otherwise known as the "burn card," shall be disclosed if requested by a player.

- 7.5.2. Procedures for dealing Blackjack by hand or from a shoe, including but not limited to the following:
- a. At the commencement of each round of play and after wagers have been placed the dealer shall verbally announce and run their hand across the table to indicate no more bets are allowed.
 - b. The dealer shall, starting on his/her left and continuing around the table toward his/her right, deal the cards in the following order:
 - i. One card face upwards to each box on the layout in which wager is contained
 - ii. One card face down to the dealer
 - iii. A second card face upwards to each box in which a wager is contained
 - iv. A second card face down, turning the original dealer card face up
 - v. Care shall be taken to avoid exposing the dealer's hole card to players
 - c. After two cards have been dealt to each player and the dealer, the dealer shall, beginning from his left, indicate each player's turn to act.
 - d. Each player shall indicate to the dealer whether he wishes to double down, split pairs, stand or draw as provided in the game rules.
 - e. As each player indicates his/her decision(s), the dealer shall deal face upwards whatever additional cards are necessary to effectuate such decision consistent with the rules of play and shall announce the new point total of such player after each additional card is dealt.
 - i. Each player at the table shall be responsible for correctly computing the point count of his/her hand.
 - ii. No player shall rely on the point counts to be announced by the dealer without checking the accuracy of such announcement.
 - f. At no time shall a player be allowed to touch the cards.
 - g. At the conclusion of a round of play:
 - i. All cards remaining on the layout shall be picked up by the dealer in order in such a way that they can be readily arranged to indicate each player's hand in case of questions or dispute.
 - ii. The dealer shall pick up the cards beginning with those of the player to his far right and moving counterclockwise around the table.
 - iii. After all the players' cards have been collected the dealer shall pick up his cards and place them in the discard rack on top of the players' cards.
 - h. Whenever the cutting card is reached in the deal of the cards, the dealer shall continue dealing the cards until that round of play is completed after which he shall reshuffle the cards.
 - i. If at the beginning of a new round, the first card to be dealt is the cutting card, the dealing shall stop, and the dealer shall shuffle the decks.

- 7.6. No player or spectator shall handle, remove, or alter any cards used to game at blackjack except as explicitly permitted by the rules of play.
- 7.7. At any time when all players leave a table and prior to play resuming, the cards shall be spread out face upwards on the table for visual inspection by the first player or players to arrive at the table. Upon request by the first player or players, the cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence.
- 7.8. No more than seven players shall be allowed to make wagers at any single gaming table for any given hand.
 - 7.8.1. Prior to the first card being dealt for each round of play, each player at the game of Blackjack shall make a wager against the dealer, which shall win if:
 - a. The score of the player is 21 or less and the score of the dealer is in excess of 21
 - b. The score of the player exceeds that of the dealer without either exceeding 21
 - c. The player has achieved a score of 21 with the first two cards (i.e., a Blackjack) and the dealer has achieved a score of 21 with more than two cards
 - 7.8.2. Except as otherwise provided in the DGRs, no wager shall be made, increased or withdrawn after the first card of the respective round has been dealt.
 - a. Once the first card of any hand has been dealt by the dealer, no player shall handle, remove, or alter any wagers that have been made unless the dealer approves such an alteration or removal of a wager in accordance with these regulations.
 - b. Once a wager on the insurance line, a wager to double down, a wager on an over under 13, or a wager to split pairs has been made and confirmed by the dealer, no player shall handle, remove, or alter such wagers unless the dealer approves such a removal or alteration in accordance with these regulations.
 - 7.8.3. All wagers shall be made by placing gaming cheques or chips on the appropriate areas of the table layout.
 - 7.8.4. A player may wager on more than one box at the blackjack table provided the gaming enterprise shall have the authority and discretion to prohibit this during hours when there are insufficient seats in the Gaming Enterprise to accommodate patron demand.
 - 7.8.5. Cash or cash equivalent as approved by the GRA may be accepted provided that the acceptance of cash is limited to an exchange of cash for cheques and is confirmed by the dealer and a pit boss or floor supervisor.
 - 7.8.6. The Gaming Enterprise shall develop a system of internal controls for debit cards being accepted as payment for cheques, internal controls shall be submitted to the GRA for approval, including, but not limited to, the following:
 - a. Size of printed slip
 - b. Procedures for handling the printed slip
 - c. Procedures for verification of the amount of the cheques purchased
 - 7.8.7. The Gaming Enterprise, at its discretion, may charge a player a fee for placing a wager. Rules for fees shall be made available at the player's request. The amount of the fee and basic rules governing fees shall be conspicuously posted at the location where blackjack is played.

- 7.8.8. Fees must not be placed in the drop box or commingled with gaming revenue from table games unless an automated system is used to track the contributions.
- 7.8.9. The Gaming Enterprise shall establish minimum and maximum wagers permitted at each blackjack table in the Casino.
- a. The minimum and maximum wagers shall be conspicuously posted at each table.
 - b. The Gaming Enterprise, at its discretion, may change the minimum and or maximum at any table, provided that the players that are already playing at the table shall not be required to abide with the new minimum.
 - c. Any player may choose to bet the new maximum.
 - d. If the maximum bet at any given table is changed to greater than or equal to \$200 during the gaming day, Surveillance shall be notified.
- 7.8.10. Except for a blackjack, all winning wagers made in accordance shall be paid at odds of 1 to 1. Any other payouts, including payouts for Blackjack, shall be submitted to the GRA for approval.
- 7.8.11. The odds for the payment of all winning wagers and a Blackjack shall be conspicuously posted at the gaming table.
- 7.8.12. Any wagering restrictions shall be submitted and approved by the GRA prior to the wagering restriction taking place.
- a. The Gaming Enterprise may preclude a person who has not made a wager on the first round of play from entering the game on a subsequent round of play prior to a reshuffle of the cards occurring.
 - b. Any person permitted by the Gaming Enterprise to enter the game after the first round of cards is dealt may be limited by the Gaming Enterprise to a wager of the minimum limit posted at the table until the cards are reshuffled, and a new deal commences.
 - c. Any player who, after placing a wager on any given round of play, declines to place a wager on any subsequent round of play may be precluded from placing any further wagers until that deck or shoe of cards is completed and a new deck or shoe is commenced.
- 7.8.13. If the first face up card dealt to the dealer is 2, 3, 4, 5, 6, 7, 8, or 9 and a player has a blackjack, the dealer shall announce and pay the winner at odds in play at that table, either immediately or at hand's conclusion.
- 7.8.14. If the first face up card dealt to the dealer is an Ace, King, Queen, Jack or Ten and a player has a blackjack, the dealer shall announce the blackjack but shall make no payment nor remove any cards until all other cards are dealt to the players and the dealer receives his second card.
- a. If, in such circumstances, the dealer's second card does not give him a blackjack, the player having a blackjack shall be paid at odds in play at that table.
 - b. If, however, the dealer's second card gives him a blackjack, the wager of the player having a blackjack shall constitute a tie or a push.
- 7.8.15. The Gaming Enterprise shall develop internal controls governing placement of a player on special rules which include at minimum:

- a. What rules are being enforced
- b. When the rules are being enforced
- c. Requirements for guest notification
- d. Requirements for Surveillance/GRA notification

8. Rules of Play and Game Play Options Standards

- 8.1. The Gaming Enterprise shall develop a system of internal controls for rules of play and game play options that include, but are not limited to the following:
 - 8.1.1. Surrender
 - 8.1.2. Insurance
 - 8.1.3. Doubling down
 - 8.1.4. Splitting pairs
 - 8.1.5. Over/Under 13
 - 8.1.6. Side wagers
 - 8.1.7. If any of these are not allowed, departmental SICS and the rules provided to the players or posted shall so state.
- 8.2. All rules specifically governing the play shall be made available to any player upon request.
- 8.3. The basic rules governing the play shall be conspicuously posted at the location where blackjack is being played.
- 8.4. The Gaming Enterprise shall develop a system of internal controls for drawing of additional cards by players that include, but are not limited to the following:
 - 8.4.1. A player may elect to draw additional cards whenever their point count total is less than 21 except that:
 - a. A player having a blackjack or a hard total of 21 may not draw additional cards.
 - b. A player electing to double down may only draw one additional card.
 - c. A player splitting aces shall only have one card dealt to each ace and may not elect to receive additional cards.
 - 8.4.2. A dealer shall draw no additional cards to their hand, regardless of the point count, if decisions have been made on all players' hands and the point count of the dealer's hand shall have no effect on the outcome of the round of play.
 - 8.4.3. Unless all decisions have been made on all players' hands, a dealer shall draw additional cards to their hand until they have a total, as posted on the layout, at which point no additional cards shall be drawn.

9. Table Games Protection Standards

- 9.1. The Gaming Enterprise shall develop a system of internal controls for table game protections that include, but are not limited to the following:

- 9.1.1. Security measures to prevent duplication of cheques or chips
- 9.1.2. Security and access restrictions to table game areas
- 9.1.3. Visible display of rules and payouts
- 9.1.4. Display of betting limits at each table
- 9.1.5. Table game cheque/chip tray security
- 9.1.6. Manual rating processes
- 9.1.7. Equipment maintenance procedures for associated equipment including:
 - a. Automatic shuffler(s)
 - b. Progressive jackpot table game equipment
 - c. Card canceling and/or scoring equipment
- 9.1.8. Dealer protocols including:
 - a. Dealer maintaining physical and visual control of the game
 - b. Dealer uniform requirements
 - c. Dealers shall not touch any cheques or chips on a dead game without a pit boss or floor supervisor present.
- 9.1.9. If a card or cards leaves the table surface, cards should be verified to ensure all cards are accounted for without damage or markings.
- 9.1.10. Cheque and chip design and security features shall be submitted to the GRA for review and approval prior to purchase. When new gaming cheques or chips are purchased, they must contain a minimum of 1 security feature. such as a water mark, hologram, RFID, etc.
- 9.2. Table/felt design shall be submitted to the GRA for review and approval prior to installation.
- 9.3. The GRA shall be notified of any table floor moves at least seven (7) days prior to the move.

10. Standards for Progressive and Promotional Pools and Pots

- 10.1 Once a progressive pool or pot is established, funds cannot be shared with any other pool or pot without prior GRA Board approval.
- 10.2 The Gaming Enterprise, with GRA approval, shall establish procedures covering payout of the progressive pool or pot. These procedures shall include, but are not limited to, the following:
 - 10.2.1 All funds contributed by players into the pools and pots must be returned when won in accordance with the posted rules with no commission or administrative fee withheld.
 - 10.2.2 The payout may be in the form of personal property.
 - 10.2.3 A combination of a promotion and progressive pool or pot may be offered.
 - 10.2.4 Payouts may also include other methods of distribution that accrue to the benefit of the gaming public via an award or prize.

- 10.2.5 The Gaming Enterprise, with approval from the GRA, will establish a ceiling amount for the player pool games. If the player pool reaches that amount, the Gaming Enterprise shall submit to the GRA a distribution proposal to return a portion of the funds to the players through promotion, award or prize.
- 10.3 The conditions for participating in current progressive pools, pots, and any related promotions, including drawings and giveaway programs, must be prominently displayed and available for patron review at the Gaming Enterprise.
- 10.4 Individual payouts for card game progressive pools, pots, and any other promotion, including related drawings and giveaway programs, that are \$600.00 or more must be documented at the time of the payout to include the following:
 - 10.4.1 Date and time
 - 10.4.2 Dollar amount of payout or description of personal property
 - 10.4.3 Reason for payout (e.g., promotion name)
 - 10.4.4 Signatures of at least two (2) key associates verifying, authorizing, and completing the promotional payout with the patron. The associates need not be Table Games associates, provided that the required signatures are those of the associates completing the payout with the patron; and
 - 10.4.5 Patron's name
- 10.5 If the cash (or cash equivalent) payout for the card game progressive pot, pool, or related promotion, including a payout resulting from a drawing or giveaway program, is less than \$600.00, documentation must be created to support accountability of the bank from which the payout was made. Such documentation may consist of a line item on a Table Games Department or cage accountability form (e.g., 43 (forty-three) \$10.00 card games giveaway coupons = \$430.00).
- 10.6 Rules governing progressive pools and pots must be conspicuously posted or available in writing for patron review and must designate:
 - 10.6.1 The amount of funds to be contributed from each pool or pot
 - 10.6.2 What type of hand it takes to win the pool or pot (e.g., what constitutes a "bad beat")
 - 10.6.3 How the funds will be paid out (e.g., cheques, cash, etc.)
 - 10.6.4 How/when the contributed funds are added to the pool or pot, and
 - 10.6.5 Amount/percentage of funds allocated to primary and secondary pools (if applicable)
- 10.7 Progressive pool and pot contributions must not be placed in the drop box or commingled with gaming revenue from table games unless an automated system is used to track the contributions.
- 10.8 The amount of the pool or pot must be conspicuously displayed.
- 10.9 At least once each day that the game is offered, the posted pool or pot amount must be updated to reflect the current pool or pot amount.

History

Approved by Band Assembly on November 10, 2005.

Changes approved by the GRA Board on July 27, 2008. Effective Date: September 11, 2008.

Changes approved by the GRA Board on July 6, 2011. Effective Date: July 6, 2011.

Changes approved by the GRA Board on August 24, 2023. Effective Date: December 31, 2023.

Prior versions of this Detailed Gaming Regulation are available upon request from the Gaming Regulatory Authority.

Each Gaming Enterprise shall come into compliance with changes no later than December 31, 2023.