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

November 5, 2026

NOTICE OF INTENT TO ADOPT

Pursuant to 15 MLBS § 306(b)(1), this serves as the official Notice of Intent to Adopt the following:

Changes to:
DETAILED GAMING REGULATION – 2 General Standards

Summary of changes to DGR-2 General Standards includes:

1. New numbering and easy to read format.
2. New DGR combining requirements from several other DGRs in one place.

Pursuant to 15 MLBSA § 306(b)(1)(i): Comments may be submitted on the proposed regulation no later than thirty (30) days from the date of the notice. The proposed regulation may be modified if supported by the data and views submitted. Comments may be submitted **no later than 8:00 a.m. on Monday, December 7, 2026,** to the Executive Director of the Office of Gaming Regulation & Compliance at **Gaming Regulatory Authority, 777 Lady Luck Drive, Hinckley, MN 55037,** or emailed to **CStaples@mlbgra.com**.

Gaming Regulatory Authority Board

11/05/2026
Date

Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR- 2 General Standards

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1. Overview of Detailed Gaming Regulations (DGR) and System of Internal Control Standards (SICS)

1.1. The Gaming Operation shall comply with all applicable requirements set forth in the Tribal-State Compacts, applicable Federal Regulations and Mille Lacs Band Detailed Gaming Regulations (DGRs).

1.1.1. If there is a direct conflict between an internal control standard established in a Tribal-State compact and a standard or requirement set forth in the DGRs, then the internal control standard established in a Tribal-State compact shall prevail.

1.1.2. If there is a direct conflict between an internal control standard established in applicable Federal Regulations and a standard or requirement set forth in the DGRs, then the internal control standard established in Federal Regulations shall prevail.

1.1.3. The Gaming Operation shall comply with all tribal, state, and federal laws and obligations.

1.2. Failure on the part of any associate(s) to comply with the requirements of the DGRs may result in adverse licensing action, up to and including revocation of a license.

1.3. The Gaming Operation shall implement a System of Internal Control Standards (SICS), as approved by the Gaming Regulatory Authority (GRA) Board.

1.3.1. Initial SICS submissions shall be submitted to the GRA for review and to the GRA Board for approval prior to implementation.

1.3.2. Subsequent revisions to previously approved SICS shall be submitted to the GRA for review and approval at least 30 days prior to implementation.

1.3.3. The GRA reserves the right to require changes to any SICS to ensure compliance with applicable laws, regulations, and these DGRs.

1.3.4. Each department's SICS shall be reviewed by the department at least annually and updated as necessary to reflect changes in procedure. Such review shall be documented, and the documentation shall be made available to the GRA upon request.

1.4. The Gaming Operation shall ensure a proper segregation of duties specifically designed to create a system of checks and balances to safeguard the integrity of the Gaming Operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.

1.5. The Gaming Operation shall verify that all game rules and disclaimers are displayed at all times or made readily available to the player upon request.

1.6. The Gaming Operation shall prepare accurate, complete, legible and permanent records of all transactions pertaining to revenue and operational activities.

1.6.1. The Gaming Operation shall prepare transactions in accordance with the appropriate authorization, as provided by management.

1.6.2. The Gaming Operation shall maintain and preserve all financial records and relevant supporting documentation.

1.6.3. Corrections to information shall be made as follows, and in a legible manner:

a. Drawing a single line through the error.

b. Writing the correct figure above the original figure.

c. Obtaining the initials of at least two (2) associates who verified the change.

1.7. In the performance of their job duties, the GRA representatives shall have unrestricted access to all gaming and secure areas of the Gaming Operation. The GRA representative shall obtain a security escort as needed while accessing the secure areas.

1.8. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the DGRs, and as approved by the GRA, will be acceptable.

2. Uniform Standards for Key Employees

2.1. The Gaming Operation shall develop SICS for proper uniforms for key employees including, but not limited to, the following:

2.1.1. Notification to the GRA of purchase of uniforms prior to purchase.

2.1.2. Positions that require clothing that either have no pockets or the pockets are sewn shut.

2.1.3. Positions that require wearing of aprons.

2.1.4. Positions that require the use of jumpsuits.

2.1.5. The wearing of jackets or sweaters.

3. Cash and Cheque/Chip Handling Standards

3.1. The Gaming Operation shall develop SICS for handling cash including, but not limited to, the following:

3.1.1. Clearing hands.

3.1.2. Standards for the fanning of bills, including order of payout (e.g. starting with largest denomination and ending with smallest denomination).

3.1.3. Verification requirements of bricked, strapped, and loose bills.

3.1.4. Cash, coins, and checks shall be organized in a manner to facilitate counting and safekeeping of funds.

3.1.5. Standard accumulation amounts shall be developed for the following:

a. Bricked currency by denomination.

b. Strapped currency by denomination.

3.1.6. Currency shall be routinely rotated and issued to Cashiers or deposited to the bank in a timely manner.

3.1.7. Standards shall be developed for the rotation of straps on a routine basis to ensure timely verification of straps when issued to Cashier or deposited to the bank. Straps shall be initialed and dated each time the strap is counted down.

3.1.8. Standards shall be developed for mutilated or damaged bills.

3.2. The Gaming Operation shall develop SICS for the handling of counterfeit bills including, but not limited to, the following:

3.2.1. Management shall be notified of receipt of counterfeit bills.

3.2.2. A surveillance photo of the patron shall be obtained, if possible.

3.2.3. Documentation shall include the following:

a. Date and time.

b. Location.

c. Names and/or descriptions of patrons involved in the situation or transaction.

d. Associates involved.

e. Description of the situation.

f. Results of any investigations.

g. Resolution of the counterfeit bill(s), including turning over the bill(s) to appropriate law enforcement agency.

3.3. The Gaming Operation shall ensure any foreign currency accepted shall be segregated from the rest of the funds included in the Vault accountability.

3.4. The Gaming Operation shall develop SICS for handling cheques and chips including, but not limited to, the following:

3.4.1. Gaming cheques and chips shall be organized in a manner to facilitate counting and safekeeping.

3.4.2. Cheques and chips shall be broken down for guest verification.

3.4.3. Cheques and chips shall be counted out under the view of Surveillance cameras including:

a. Cheque and chip racks shall be broken down for Surveillance to confirm the number of racks exchanged out.

b. Cheques and chips shall be displayed in order of largest to smallest in denomination.

3.4.4. Cheques and chips shall be handled with one hand only (using a finger cut) when stacking.

3.4.5. Verification of loose cheques and chips shall be displayed individually and not partially stacked.

3.4.6. Cheques and chips shall be racked and barreled neatly and separated by denomination.

3.4.7. Shift change verification standards for the cheques and chips shall be developed, including requirements for visual verification and for breakdown of racks for large denominations at each shift change.

3.4.8. The Gaming Operation shall develop standard cheque and chip accumulation amounts for the following by denomination:

a. Stacks.

b. Barrels.

c. Racks.

3.4.9. The Gaming Operation has the right to demand the redemption of cheques, chips, and tokens.

3.5. The Gaming Operation shall develop SICS for reserve gaming cheques and chips including, but not limited to, the following:

3.5.1. Reserve cheques and chips shall be stored in a designated secure location with high-security locks and sealed with a pre-numbered control seal, which shall be documented and verified at each count.

3.5.2. Reserve cheque and chip verification procedures shall be performed at least annually.

a. The GRA shall be notified of the timing of the reserve cheque and chip inventory count.

b. Verification shall be performed by at least one Cage associate and at least one associate independent of the Cage department.

c. Documentation of the count shall be maintained.

3.5.3. Prior to the release of the reserve gaming cheques and chips, the accounting department shall verify the contents to be distributed reconciles to the amount documented on the supporting paperwork.

3.6. The Gaming Operation shall develop SICS for mutilated or damaged cheques and chips.

3.7. The Gaming Operation shall develop SICS for abandoned cheques and chips.

3.8. Cheques, chips, or tokens from other casinos shall not be accepted.

4. Inventory Control Standards

4.1. The Gaming Operation shall develop SICS for the accountability of inventory of the Gaming Operation, including but not limited to the following:

4.1.1. Controls for the receipt and issuance of inventory.

4.1.2. Location and physical and logical controls for inventory.

4.1.3. Approvals and authorizations necessary for the issuance and/or use of inventory.

4.1.4. Periodic verification of inventory by an independent department.

4.2. Inventory subject to controls shall include, but not be limited to the following:

4.2.1. Cash, cheques, chips, and other gaming instruments (see also Cash and Cheques/chips Handling section).

4.2.2. Gift cards, promotional items, and other marketing items.

4.2.3. Fixed assets and gaming equipment.

5. Minimum Training Standards

5.1. The Gaming Operation shall develop and establish a training program to ensure that associates holding a gaming license are adequately trained on the DGRs applicable to their job duties.

5.2. The training program shall include, but is not limited to, the following:

a. Training on DGRs, Tribal/State Compacts, and federal regulatory requirements as applicable by job/position.

b. Nature and frequency of training by topic and job/position.

c. Documentation to support completed training, including acknowledgement by the associate of comprehension of DGR requirements.

5.3. Training on applicable regulations, including but not limited to the DGRs, shall be provided to associates either prior to beginning their job functions or as part of their on-the-job training.

5.4. The training program shall include clear communication to associates that violations of the DGRs are subject to penalties under the provisions of DGR 24.

History:

New numbering and easy to read format.

New DGR combining requirements from several other DGRs in one place.