

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

June 6, 2024

# NOTICE OF INTENT TO ADOPT

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

## **Changes to:**

# DETAILED GAMING REGULATION – 16 Promotions and Complimentary Standards (Formerly DGR – 14 & 22)

Summary of changes to DGR-16 Promotions and Complimentary Standards:

- 1. New numbering and easy to read format.
- 2. Enhanced promotional rules standards (Section 1).
- 3. Added days' notice to the GRA (Section 1).
- 4. Added items gifts security (Section 1).
- 5. Increased promotional payments or items to \$100 (Section 2).
- 6. Added GRA notification of any changes to the complimentary authorization matrix (Comp Grid) (Section 3).
- 7. Changed coupon audits to quarterly (Section 4).

Pursuant to 15 MLBSA § 306(b)(1): 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 8:00AM on Monday**, July 8, 2024, 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 mpomerleau@mlbgra.com.

Michel Dave	6/6/2024
Gaming Regulatory Authority Board	Date



# Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority Detailed Gaming Regulations

**DGR-16 Promotions and Complimentary Standards** 

# **Table of Contents**

1.	General Promotions Standards	. 3
2.	Promotional Payment Standards	. 3
3.	Complimentary Services or Items Standards	. 4
4.	Coupon Standards	

#### 1. General Promotions Standards

- 1.1. Supervision shall be provided as needed for promotions by an associate(s) with authority greater than those being supervised.
- 1.2. The rules of each gaming promotional event(s), drawing and/or giveaway program shall be conspicuously displayed and made readily available to patrons upon request during the entirety of the promotion.
  - 1.2.1. Gaming promotion event(s), drawing and/or giveaway rules require at least 5 days notice to the GRA for approval prior to implementation. Changes to the rules will be communicated to the GRA immediately upon update.
  - 1.2.2. Gaming promotions event(s), drawings, or giveaway programs shall include the following:
    - a. The rules of play.
    - b. The nature and value of the associated prize(s) or cash award(s).
    - c. Any restrictions or limitations on participant eligibility.
    - The date(s), time(s), and location(s) for the associated promotional activity or activities.
    - e. Controls to ensure the integrity of the promotional event(s).
    - f. Any other restrictions or limitations, including any related to the claim of prizes or cash awards.
    - g. The announcement date(s), time(s), and location(s) for the winning entry or entries.
    - h. Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties.
- 1.3. The Gaming Operation shall perform pro and post forma analysis for each promotion, drawing, and giveaway, which shall be made available to the GRA upon request.
- 1.4. Any promotional or complimentary item or gift valued at \$100 or more shall be stored in a secured access area, under surveillance coverage, and logged in and out of inventory.

#### 2. Promotional Payment Standards

- 2.1. The Gaming Operation shall develop a system of internal controls for any payments resulting from a promotional payment, drawing, or giveaway program. This section does not apply to payouts for card game promotional pots and/or pools.
  - 2.1.1. The system of internal controls shall include the reporting of prizes and awards as required by the IRS.

- 2.2. All promotional payments or items shall be documented to support accountability.
- 2.3. Promotional payments or items of \$100 or more in value must be documented at the time of the issuance, and must include the following:
  - 2.3.1. Date and time.

- 2.3.2. Value amount of payment, service, or item.
- 2.3.3. Reason for payment.
- 2.3.4. Patron's name and confirmation that identity was verified.
- 2.3.5. Signature(s) of at least two (2) associates verifying, authorizing, and completing the promotional payment with the patron.
- 2.3.6. Name of the contest/tournament or type of complimentary service or item.
- 2.4. For computerized systems that validate and print the dollar amount of the payment on a computer-generated form, only one (1) signature is required.

### 3. Complimentary Services or Items Standards

- 3.1. The Gaming Operation shall develop a system of internal controls for complimentary services or items that shall include the following:
  - 3.1.1. Associates authorized to approve the issuance of complimentary services or items, including levels of authorization.
  - 3.1.2. Limits and conditions on the approval and issuance of complimentary services or items.
  - 3.1.3. Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items.
- 3.2. The GRA shall be notified when changes to the complimentary authorization matrix occur.
- 3.3. Structuring of complimentary services or items by an individual or individuals to avoid approval levels is strictly prohibited.
- 3.4. All promotions and complimentary services or items shall be tracked and administered through the system.

#### 4. Coupon Standards

- 4.1. The Gaming Operation shall develop a system of internal controls for coupons distributed by the Gaming Operation to the public including, but not limited to the following:
  - 4.1.1. Receipt/printing of coupons.
  - 4.1.2. Serialization or other controls to limit abuse of coupons.
  - 4.1.3. Inventory of coupons.
  - 4.1.4. Issuance of coupons to department inventory.
  - 4.1.5. Issuance of coupons to patrons.
  - 4.1.6. Redemption of coupons.
  - 4.1.7. Destruction or voiding of coupons.
  - 4.1.8. Segregation of duties between the receipt, inventory, issuance, and destruction/void of coupons.

- 4.2. Coupons shall only be stored in locations which allow surveillance coverage of the actual coupons when being accessed and the associates involved in handling the coupons.
- 4.3. Each department responsible for coupon distribution shall maintain a coupon control log. The log shall include, but not be limited to the following:
  - 4.3.1. The type of coupon.
  - 4.3.2. The date coupons are added to or removed from inventory.
  - 4.3.3. The beginning and ending serial numbers of coupons distributed to guests or returned to inventory.
  - 4.3.4. The quantity of coupons distributed or returned to inventory.
  - 4.3.5. The name and file number of the associate distributing the coupons to guests.
  - 4.3.6. The serial numbers of any coupons that were voided and the reason for the void.
  - 4.3.7. Any variations discovered and an explanation of the variations.
- 4.4. Each coupon or part thereof issued by the Gaming Operation shall only be redeemable for a specific amount of cash, cash equivalents, gaming chips, slot tokens, a specific service or item, or a multiplier to be applied to an earned point or comp value.
- 4.5. All coupons shall be printed with an expiration date.
- 4.6. Audits of active unissued coupons shall be completed at least quarterly by two associates, one of which must be a supervisor or manager.

# **History**

This Detailed Gaming Regulation is a combination of multiple DGRs; previously DGR-14 Complimentary Services or Items, Player Tracking & Gaming Promotions, and DGR-22 Coupon and Other Complementary Distribution Program Controls.

Changes approved by the GRA Board on XXXX. Effective Date: XXXX.

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