



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

December 18, 2025

**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 – 11 Video Games of Chance (VGC)**

Summary of changes to DGR-11 Video Games of Chance includes:

1. New numbering and easy to read format.
2. Some sections moved to DGR 3a Gaming Software and Equipment General Standards.
3. Added to Section 1 several areas from the Tribal – State Compact for Video Games of Chance.
4. Added to Section 2.1.4 requirement for software revoked by the Independent Test Lab needs to be either returned to the vendor or destroyed as soon as practical and kept separate from approved software until that happens.
5. Added to Section 3.3.3 Retention of Machine Entry Access Logs (MEAL) in electronic form and requirement for GRA access.
6. Added in section 4.4 Increased requirements for removal, storage, and disposal of VGCs.
7. Added in section 5.2 notice to Surveillance of moving VGCs and overhead signage increased from 48 hours to three days.
8. Added in section 5.4 requirement for Gaming Operation to create SICS for securing VGC logic doors.
9. Added in section 7.1 additional requirements for SICS covering VGC malfunction.
10. Added in section 9 additional requirements for removing progressive VGCs and accumulated amounts from the gaming floor.
11. Added in section 11.2 requirement for notice to Surveillance for a cancel credit payout of \$100 or more.
12. Added in section 11.4 verification requirements based on dollar amount of the manual payout mirroring jackpot payout standards.
13. Added section 12 VGC Appeasement Payout Standards.
14. Added section 15.1 that consideration, entry fee, is not allowed for VGC tournaments.

Pursuant to 15 MLBS § 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, January 19, 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 **MPomerleau@mlbgra.com**.

Gaming Regulatory Authority Board

12/18/25

Date



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR- 11 Standards for Video Games of Chance

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1. Video Games of Chance (VGC) General Standards

- 1.1. No VGCs may be purchased, leased or otherwise acquired by a Gaming Operation/Gaming Enterprise unless:
 - 1.1.1 The VGC is purchased, leased or acquired from a manufacturer or distributor licensed to sell, lease or distribute VGCs by the GRA Board; and
 - 1.1.2 The VGC, or a prototype thereof, has been tested, approved or certified by an approved independent gaming testing laboratory (ITL) as meeting the requirements and standards of these Regulations and the Compact.
- 1.2. For this section only, credit means a unit of value equivalent to cash or cash equivalents deposited, wagered, won, lost, or redeemed by a guest at a VGC.
- 1.3. Accurate and current theoretical hold worksheets shall be maintained for each VGC.
- 1.4. The Gaming Operation/Gaming Enterprise shall maintain records for each VGC, which indicate the following:
 - 1.4.1. The date the VGC was placed into service
 - 1.4.2. The date the VGC was removed from operation
 - 1.4.3. The date the VGC was placed back into operation
 - 1.4.4. Any changes in VGC numbers and designations
- 1.5. Updates to the on-line VGC monitoring system to reflect the following prior to the VGC drop:
 - 1.5.1. Additions of VGCs
 - 1.5.2. Deletions of VGCs
 - 1.5.3. Movements of VGCs
- 1.6. VGCs shall contain functioning meters connected to the on-line VGCs monitoring system that captures:
 - 1.6.1. Coin-in (also known as credit in)
 - 1.6.2. Bill-in, including:
 - a. Dollar amounts by denominations
 - b. Including total dollar amounts
- 1.9. All signage shall reflect accurate VGC information.

2. VGC Software Storage Standards

- 2.1 Software Storage Controls.

- 2.1.1 Software or hardware that is required to change any parameter on VGCs or related equipment shall be secured in a dual locked cabinet with access restricted to Security and the Office of Gaming Regulation and Compliance (OGR&C). All such software and hardware shall be logged into and out of the cabinet according to OGR&C procedures. Any hardware switches that allow changing of parameters or clearing of meters shall be secured per OGR&C instructions.
- 2.1.2 All other secured gaming software shall be secured in a dual locked cabinet with access restricted to authorized VGC and Security department associates. All software shall be logged into and out of the cabinet.
- 2.1.3 Software logs shall include the following:
 - a. Date out/Date in
 - b. Time out/Time in
 - c. Software I.D./version and amount/number
 - d. Reason
 - e. Initials of the associate issuing the software and
 - f. Signature and file number of associates involved.
- 2.1.4 At least quarterly, inventories must be conducted on software storage cabinets and the results forwarded to the GRA. Any discrepancies in the inventory (difference between what was expected and what was present) must be investigated and the results of such investigation forwarded to the GRA.
 - a. Software that is classified as Non-Mandatory Upgrade (NU), no longer going to be used on the gaming floor, or removed from VGCs in long term storage, does not have to be inventoried quarterly provided it is verified, sealed, stored in a dual controlled area, and kept separate from all other software.
 - b. A log or other permanent form of documentation will be used to indicate what software is contained in this storage area.
 - c. Software that has been revoked by the ITL shall either be returned to vendor or destroyed as soon as practical. Until it is returned or destroyed, it shall be kept separate from both approved and NU software and clearly marked as revoked.

3. Entry to VGCs

- 3.1. All associates accessing meters (other than when performing the bill validator drop), performing game recalls, or accessing the interior of the VGC shall communicate their access/activity by inserting their access card into the VGC's card reader.
- 3.2. The associate who enters/accesses the VGC shall be responsible for all activity inside the VGC.
- 3.3. The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for machine access to VGCs, related equipment, and VGC software, including but not limited to, the following:
 - 3.3.1. Except for access involving the count team during unscheduled or unscheduled drops, all access to VGCs shall be documented by the associate who opened the VGC on a Machine Entry Access Log (MEAL).
 - 3.3.2. The following shall be documented on a MEAL for each access to a VGC or access to any VGC meter:

- a. Date and time of entry
 - b. Location (bank and stand)
 - c. Machine number
 - d. Reason for entry
 - e. Name and associate number of the associate entering the VGC and/or accessing the meters
 - f. MEALs will not contain codes for the type of work performed unless the codes are defined in the department procedures/SICS.
- 3.3.3. MEALs shall be retained either manually or electronically for each VGC.
- a. If the MEAL is maintained manually, the MEAL shall be maintained with the VGC at all times.
 - b. MEALs shall be available for GRA review and investigation.
 - c. All MEALs shall be retained for at least one (1) year after the VGC is removed from service and/or disposed of.

4. VGCs Receipt Removal & Disposal Standards

- 4.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls to safeguard the integrity of VGCs, related equipment, and VGC software.
- 4.2 The Gaming Operation/Gaming Enterprise shall notify the GRA of the following:
 - 4.2.1 Any pending shipments of VGC equipment or VGC software upon communication of the order to the supplier
 - 4.2.2 VGC equipment or VGC software removed temporarily or permanently from the floor at least twenty-four (24) hours prior to scheduled removal
 - 4.2.3 Disposal of any VGC equipment or VGC software at least forty-eight (48) hours prior to disposal, including being returned to vendor
- 4.3 VGC equipment and/or VGC software shall be received and verified against the shipping notification by an authorized VGC department associate escorted by Security and verified by a GRA associate or designee. Such receipt and verification shall take place as soon as practical, but no later than the next business day.
- 4.4 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the removal of VGCs, related equipment, and VGC software from the gaming floor, including but not limited to the following:
 - 4.4.1 For temporary storage of VGCs, the following shall apply:
 - a. The Bill Validator Box (BVB) contents shall be counted and recorded in accordance with the drop and count DGR standards.

- b. VGCs and related equipment (locks, software, etc.) shall be protected from unauthorized access or damage while temporarily stored.
- 4.4.2 For permanent removal or long-term storage of VGCs, the following shall apply:
 - c. The BVB contents shall be counted and recorded in accordance with the drop and count DGR standards.
 - d. The Gaming Operation/Gaming Enterprise shall remove, document, and/or secure any and all applicable associated/related equipment such as locks, card readers, ticket printers, etc.
 - e. The Gaming Operation/Gaming Enterprise shall remove, document, and secure all software, unless otherwise approved in advance by the Executive Director of the OGR&C or designee.
- 4.4.3 Documentation for the storage of VGC equipment and/or VGC software shall include, but is not limited to, the following information:
 - f. Date
 - g. Serial number
 - h. Manufacturer
 - i. Program/software number
 - j. Personnel involved
 - k. Storage location(s) until return to operation and as approved by the GRA
 - l. For temporary removal, the approximate date of storage until return to operation, not to exceed sixty (60) days, unless approved by the GRA
 - m. Seal numbers, if applicable
- 4.5 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the disposal of VGCs, including but not limited to the following:
 - 4.5.1 For the disposal of VGCs, related equipment, and VGC software, the Gaming Operation/Gaming Enterprise shall submit a disposal request to the GRA for approval at least five days prior to the disposal.
 - 4.5.2 The Gaming Operation/Gaming Enterprise shall notify Surveillance prior to disposal.
 - 4.5.3 The disposal documentation will include, but is not limited to, the following:
 - n. Date
 - o. Time
 - p. Location
 - q. Method of disposal
 - r. Identification and/or description of items being disposed of
 - s. Signatures of associate(s) attesting to the disposal

5. VGCs Installation and Floor Changes

- 5.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the installation and changes of VGCs, related equipment, and VGC software.
- 5.2 The Gaming Operation/Gaming Enterprise shall notify Surveillance at least three business days prior to moving VGCs and/or overhead signage.
- 5.3 The Gaming Operation/Gaming Enterprise shall notify the GRA about any VGC equipment or VGC software installations and/or changes at least twenty-four (24) hours prior to the scheduled change. Notification shall include, but is not limited to, the following information:
 - 5.3.1 Proposed change
 - 5.3.2 Serial number
 - 5.3.3 Denomination
 - 5.3.4 Par
 - 5.3.5 Software identification numbers of the VGCs and related equipment
 - 5.3.6 Maximum lines
 - 5.3.7 Maximum credits
 - 5.3.8 Progressive information including credits required to increment
 - 5.3.9 Pay table information
- 5.4 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the lock or physical seal of the following for VGCs. The controls shall include, but not be limited to, the following:
 - 5.4.1 Game software logic boards shall be locked requiring dual access by two independent departments, in accordance with DGR 17 Standards for Key Control.
 - 5.4.2 A person independent of the VGC department shall be present to access the device game program or other equivalent game software media
 - 5.4.3 Switches or jumpers on all circuit boards that have the potential to affect the outcome or integrity of any game, progressive award, financial instrument, cashless transaction, voucher transaction, or accounting records shall be sealed.
 - 5.4.4 A sequentially pre-numbered seal shall be affixed to access sensitive areas and/or the software of each VGC and/or related equipment, which shall be capable of evidencing tampering or removal.
 - 5.4.5 Seals shall be maintained in secure, dual access area, and shall be available only to Security and authorized Department associates.
 - 5.4.6 A log of sequentially pre-numbered seals shall be maintained and shall include, but is not limited to, the following:
 - a. VGC number
 - b. VGC serial number
 - c. Old security tape number

- d. Date removed
 - e. Military (24 hour) time tape was removed
 - f. Signature of the VGC department associate and the Security associate removing tape. If the log is kept electronically, the associate's names and badge numbers shall be recorded.
 - g. New security tape number
 - h. Date replaced or initially placed
 - i. Military (24 hour) time tape was replaced or initially placed
 - j. Signature of the VGC department associate and the Security associate placing tape. If the log is kept electronically, the associate's names and badge numbers shall be recorded.
 - k. Comments (RAM Clear, Project/area taped etc.)
- 5.4.7 Pre-numbered tamper evident tape shall be affixed to VGCs and related equipment software in a manner consistent with the recommendation of the ITL or as otherwise authorized and directed by the GRA.
- 5.4.8 The lock or seal shall necessitate the presence of an authorized security and a VGC associate to access the VGCs software program.
- 5.4.8 If a seal is used to secure the board to the frame of the VGCs, it shall be pre-numbered.
- 5.5 The Gaming Operation/Gaming Enterprise shall require the manufacturer or distributor to certify in writing to the GRA and to the State Commissioner of Public Safety the following upon installation of each VGC placed in Gaming Operation/Gaming Enterprise:
- 5.5.1 The VGC conforms precisely to the exact specifications of the VGC prototype tested and approved by the gaming test laboratory.
- 5.5.2 The VGC operates and plays in accordance with the Tribal/State compact and applicable Federal/State/Band standards.
- 5.6 VGC Testing Standards
- 5.6.3 Testing must be completed by the GRA as part of the project to verify that the VGC has been properly installed before the VGC is offered for guest play. The GRA shall create and implement procedures for the testing/verification of the VGCs. This shall include, but is not limited to, testing the following, as applicable:
- a. Communication with the gaming system
 - b. Communication with the accounting system
 - c. Communication with the player tracking system
 - d. Currency and vouchers to bill acceptor
 - e. Voucher printing
 - f. Meter incrementation, including progressive meters
 - g. Pay table, for verification

- 5.6.4 Currency Handling for Testing. All currency used for testing will be signed out at the Main Bank and requires a Security escort.
- a. The use of IVS tickets is only allowed when a ticket is received from the test currency signed out. The use of found, active, IVS tickets for testing purposes is not permitted.
 - b. Logs will be maintained, which shall include, but ~~is~~ are not limited to, the following:
 - i. Name of associate signing out the currency
 - ii. Name of Security Officer, and
 - iii. Asset (machine) number of the VGC the currency/ticket is placed into.
 - c. Currency and tickets not required for testing will be turned back in to the Main Bank.
 - d. Security shall remain with the associate until the log, tickets, and/or currency are turned in to the Main Bank.

6 VGC Licensing Standards

- 6.1 VGCs operated within the jurisdiction of the Band must be licensed by the GRA prior to being offered for guest play.
- 6.1.1 Such licensing shall include, but not be limited to, verification of:
- a. Address (bank, stand, and machine number)
 - b. Software
 - c. Configurable parameters
 - d. Progressive incrementation
 - e. Meter incrementation
 - f. Bill, coin, ticket verification as applicable
 - g. Communication verification
 - h. Button art and
 - i. Door access.
- 6.2 Licenses shall remain active provided there are no changes made to the original VGC. Any changes, removals from the system, moves, or RAM clears will suspend such license until testing and verification following OGR&C procedures has been performed.
- 6.3 Revoked software must be removed from the gaming floor within the recommended timelines given by the ITL, vendor or as otherwise determined by GRA Management.
- 6.4 Software listed as revoked or NU by the ITL shall not be installed on the gaming floor. If the NU software is currently installed in a VGC that is on the gaming floor, it may remain on the floor, provided the software is not removed from the VGC. If a VGC with NU software is removed from the gaming floor and kept intact (i.e. locks and seals not removed), the VGC may be returned to the floor. Otherwise, the NU software may not be returned to the gaming floor.

- 6.5 No VGC may be operated without a valid license issued by the GRA. A license that has been suspended or revoked is invalid.
- 6.6 If a VGC malfunctions, does not conform to technical standards, or otherwise does not meet the standards of this DGR, 15 MLBS, the Tribal/State Compact, and all other applicable laws and requirements, the Gaming Operation/Gaming Enterprise shall immediately notify the Executive Director of the OGR&C or designee. Verbal notification is acceptable, provided it is followed up with written documentation of the malfunction.
- 6.7 If a VGC malfunctions, does not conform to technical standards, or otherwise does not meet the standards of this DGR, 15 MLBS, the Tribal State Compact, and all other applicable laws and requirements, the Executive Director of the OGR&C or designee may suspend the GRA license of the VGC pending investigation.
- 6.8 In order to restore a VGC with a suspended GRA license, the Executive Director of the OGR&C or designee must be satisfied that the VGC can be operated in compliance with technical standards, this DGR, 15 MLBS, the Tribal/State Compact and all other applicable laws and requirements.
- 6.8 If a VGC malfunctions or does not conform to technical standards, this DGR, 15 MLBS, the Tribal/State Compact and all other applicable laws and requirements, the GRA Board may revoke the license of the VGC.
- 6.9 In order to restore a VGC with a revoked GRA license, the GRA Board must be satisfied that the VGC can be operated in compliance with technical standards, this DGR, 15 MLBS, the Compact, and all other applicable laws and requirements.
- 6.10 If it is not possible to make an immediate determination as to whether a VGC is in compliance, the Executive Director of the OGR&C or designee may suspend the GRA license of the VGC pending investigation.

7 VGCs Malfunction Standards

- 7.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for VGC malfunctions, including but not limited to the following:
 - 7.1.1 Identification of malfunctions
 - 7.1.2 Monitoring of malfunctions, including VGC Department review of malfunction logs
 - 7.1.3 Responding to malfunctions
 - 7.1.4 Investigating malfunctions
 - 7.1.5 Resolving malfunctions
 - 7.1.6 Documenting malfunctions and reporting malfunctions to the GRA on at least a weekly basis
- 7.2 Logs documenting malfunctions including software and/or hardware malfunctions shall be maintained and submitted to GRA on a weekly basis. Logs at a minimum shall contain:
 - 7.2.1 Date of occurrence
 - 7.2.2 Time of occurrence

- 7.2.3 VGC serial number and location
 - 7.2.4 Manufacturer
 - 7.2.5 Main program/operating system and game software
 - 7.2.6 Detailed description of malfunction
 - 7.2.7 Detailed descriptions of each time the VGC and/or related equipment is accessed
 - 7.2.8 Steps taken to correct the malfunction with each access and
 - 7.2.9 Associate names with each access.
- 7.3 RAM Clears should only be needed in extenuating circumstances and after all other avenues have been tried. If a RAM Clear process is required, all steps taken prior to the RAM Clear must be listed and the reason for the RAM Clear must be evident. A log shall be maintained which contains, but is not limited to, the following:
- 7.3.1 Date of occurrence
 - 7.3.2 Time of occurrence
 - 7.3.3 Machine Serial number and location
 - 7.3.4 Manufacturer
 - 7.3.5 Main Program and Game Software
 - 7.3.6 Detailed reason for RAM Clear
 - 7.3.7 Steps taken to resolve game issue prior to RAM Clear and
 - 7.3.8 All Associates involved.

8 VGCs Software Duplication Standards

- 8.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the duplication of VGC and related equipment software, including but not limited to, the following:
- 8.1.1 GRA shall be notified prior to duplication of any ITL approved software.
 - 8.1.2 Documentation of duplication of ITL approved software for VGCs and related equipment shall include the following:
 - a. Date
 - b. VGC number (source and destination)
 - c. Manufacturer
 - d. Program number
 - e. Associates involved
 - f. Reason for duplication
 - g. Disposition of permanently removed software

- 8.1.3 Any duplication of proprietary software must be authorized by written documentation from the owner of the software.
- 8.1.4 Software listed as revoked or Non-Mandatory Upgrade (NU) by the ITL shall not be duplicated.

9 Progressive Standards

- 9.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for progressive VGCs, which shall include the following:
 - 9.1.1 A conspicuously displayed progressive jackpot meter at or near the VGCs that shows the amount of the progressive jackpot, which shall show the current total of the progressive jackpot in credits or in monetary value.
 - a. Minor discrepancies resulting from polling cycle delays are acceptable.
 - b. Credits contributed to the progressive system during the polling cycle in which a jackpot signal is received by the progressive controller shall be deemed to have been contributed to the progressive amount before the jackpot.
 - c. Credits contributed to the progressive system in any subsequent polling cycle shall be deemed to have been contributed to the progressive amount after the jackpot.
 - d. Multiple items of information to be displayed on a VGC or progressive meter may be displayed in an alternating fashion provided there is a redundant progressive meter display.
 - 9.1.2 Procedures to record at least daily the amount shown on each progressive jackpot meter for progressive jackpots at the Gaming Operation/Gaming Enterprise, except for those jackpots that are paid directly by the VGC.
- 9.2 All VGCs connected to a linked progressive system shall be configured to require the same maximum wager.
- 9.3 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the transfer of progressive amounts in excess of the base amount to other VGCs, including, but not limited to the following:
 - 9.3.1 The progressive jackpot amount above the base amount must be transferred to a standalone progressive VGC or progressive system with the same denomination/denomination mix.
 - 9.3.2 If no other VGC meets the requirements, the Gaming Operation/Enterprise shall request and the GRA may authorize a transfer of the jackpot to the progressive meter of a similar VGC available or authorize procedures to distribute the amount to the benefit of the gaming public via an award or prize.
 - a. If transfer to other than another progressive is authorized, the procedures shall include, but are not limited to, the following:
 - i. The program, promotion, etc., shall be specified.
 - ii. All funds being transferred shall be documented on progressive dispersal forms, with the program or promotion listed on the form, and be verified by a supervisory associate from the VGC department and a finance department representative.

- iii. Any funds transferred shall be used only for the program or promotion specified. They shall not be held as funds for future unspecified use.
- 9.3.2 When removing a progressive from the floor, the following shall be performed:
- A Verification of the jackpot amount must be verified by two (2) associates, one (1) of whom is independent of the VGC department.
 - b. The jackpot amount over the base shall be documented and signed by both departments witnessing the amount.
 - c. VGC department management shall determine where to place the progressive amount and shall document this information. The following associates shall sign the documentation authorizing placement of the progressive amount:
 - i. A supervisory associate from the VGC department
 - ii. A Finance department representative
- 9.3.3 A Gaming Operation/Gaming Enterprise may permanently remove a progressive jackpot on a standalone progressive VGC, the linked progressive jackpot on an entire link of VGCs with a common progressive meter, or an entire wide area progressive system from a gaming floor, provided the following is performed:
- a. Notice of intent to remove the progressive jackpots in excess of \$5,000 above base reset amount (aggregate for all progressive levels on the VGC) is conspicuously displayed on or near each VGC for at least seven (7) days prior to the removal of the progressive jackpot.
 - b. Notification is sent to the GRA at least seven (7) days prior to the removal of the progressive jackpot.
- 9.3.4 If a temporarily removed progressive VGC is returned to the floor, the amount above the base amount of the progressive on the returned VGC may not be less than the amount above the base amount on the progressive at the time of removal.
- 9.3.5 A progressive jackpot removed from the gaming floor shall be returned to the gaming floor or available to the gaming public within five (5) gaming days. Exceptions to this time frame include, but are not limited to:
- a. The temporary removal by a Gaming Operation/Gaming Enterprise for a period not to exceed Sixty (60) days.
 - b. Linked VGCs that are a part of a wide area progressive system provided the progressive jackpot offered by the removed VGC remains available on the VGCs that are a part of the same wide area progressive system in another licensed Gaming Operation/Gaming Enterprise.

10. Jackpot Payout Standards

- 10.1 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for jackpot payouts, including but not limited to the following:
- 10.1.1 Jackpot payout documentation shall include, but is not limited to, the following:
- b. Date and time

- c. Machine number
 - d. Dollar amount of cash payout (both alpha and numeric) or description of personal property awarded, including fair market value; alpha is optional if another unalterable method is used for evidencing the amount of the payout
 - e. Preprinted or concurrently printed sequential number
 - f. Signatures of at least two (2) associates verifying and witnessing the payout
 - i. Jackpot payouts of \$5,000 to \$19,999.99 shall require the signature and verification of an associate independent of the VGC department in addition to the two (2) signatures required.
 - ii. Jackpot payouts of \$20,000.00 or more shall require the signature and verification of a member of management independent of the VGC department in addition to the two (2) signatures required.
 - g. The game outcome (including reel symbols, card values, suits, etc.) -
- 10.1.2 Computerized jackpot/fill systems, if used, shall be restricted so as to prevent unauthorized access and fraudulent payouts by one person.
- 10.2 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for the payout of wide area progressives, which shall include, but is not limited to, the following:
- 10.2.1 Jackpot verification procedures
 - 10.2.2 Payout process procedures, including Gaming Operation/Gaming Enterprise responsibilities in situations in which the payout is made by a third-party vendor (as part of a wide area progressive).
 - 10.2.3. The wide-area progressive gaming machine system shall be adequately restricted to prevent unauthorized access, such as changing passwords at least quarterly, restricting access to EPROMs or other equivalent game software media, and restricting physical access to computer hardware, etc.

11. Manual Payout Standards

- 11.1 Surveillance notification is required at initiation of all manual payments.
- 11.2 Manual payments requiring notification include, but are not limited to, the following:
 - 11.2.1 Bill in No Credit/Ticket in No Credit situations
 - 11.2.2 Short pays
 - 11.2.3 Overrides
 - 11.2.4 Manual jackpots
 - 11.2.5 Cancel Credits (of \$100 or more)
- 11.3 Inventory of manual payout forms shall be controlled and routed in a manner that precludes one (1) person from producing a fraudulent payout by:
 - 11.3.1 Forging signatures
 - 11.3.2 Altering the amount paid out subsequent to the payout

11.3.3 Misappropriating the funds

11.4 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for manual payouts, which shall include, but is not limited to, the following:

11.4.1 Manual payouts shall include, but is not limited to, the following documentation:

- a. Date and time
- b. Bank and stand number
- c. VGC number
- d. Dollar amount of payout (both alpha and numeric)
- e. Associates involved and
- f. Detailed reason

11.4.2 A manual payout log shall be maintained with all information required for manual payout documentation.

11.4.3 A VGC department supervisory associate must authorize manual payments with the exception of rounding to the next dollar.

- a. The individual that initiates the transaction cannot be the individual that authorizes the override.
- b. A physical verification by the supervisory associate must be performed to determine that the manual process is appropriate.

11.4.4 Manual payouts shall include signatures of at least two (2) associates verifying and witnessing the payout, one (1) of which must be a supervisory associate.

11.4.5 Manual payouts of \$5,000 to \$19,999.99 shall require the signature and verification of an associate independent of the VGC department in addition to the two signatures required.

11.4.6 Manual payouts of \$20,000.00 or more shall require the signature and verification of a member of management independent of the VGC department in addition to the two signatures required.

12 VGC Appeasement Payout Standards

12.1 The VGC department may provide patrons with appeasement payouts including, but not limited to, the following:

12.1.1 Damaged tickets

12.1.2 Expired tickets (expired more than 30 days)

12.1.3 Guest disputes

12.2 Inventory of manual payout forms used for VGC ticket appeasement payouts shall be controlled and routed in a manner that precludes any one (1) person from producing a fraudulent payout by:

12.2.1 Forging signatures

12.2.2 Altering the amount paid out subsequent to the payout

12.2.3 Misappropriating the funds

12.3 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls for VGC ticket appeasement payouts, which shall include, but is not limited to, the following:

12.3.1 VGC ticket appeasement payouts shall include, but is not limited to, the following documentation:

- a. Date and time
- b. Bank and stand number
- c. VGC number
- d. Guest name
- e. Dollar amount of payout (both alpha and numeric)
- f. Associates involved
- g. Supervisory approval and
- h. Detailed reason for appeasement

12.3.2 VGC ticket appeasement shall be included on a manual payout log, which shall include all information required for VGC ticket appeasement documentation.

12.3.3 A VGC department supervisory associate must authorize VGC ticket appeasement payments.

12.3.4 VGC ticket appeasement payouts shall include signatures of at least two (2) associates verifying and witnessing the payout, one (1) of which must be a supervisory associate.

12.3.5 VGC ticket appeasement payouts above \$5,000.00 shall require the signature and verification of an associate independent of the VGC department in addition to the two (2) signatures required.

13 VGC Department Funds Standards

13.1 The VGCs pouches that are active during the shift shall be counted down and reconciled each shift by two (2) associates utilizing appropriate accountability documentation, at the beginning and end of each active shift.

13.2 Unverified transfers of cash and/or cash equivalents are prohibited.

14 Forensic Testing

14.1 Forensic testing is required in atypical circumstances in order to protect the integrity of the VGC and/or related equipment, company assets, and Guest/Player perceptions. Atypical circumstances include, but are not limited to:

14.1.1 An occurrence in which a VGC and/or related equipment displays information that is outside the realm of the capability of the software installed (i.e. huge jackpot display, symbols either not awarding win when they should or awarding win when they shouldn't, symbols changing erroneously, etc.).

14.1.2 An occurrence in which manipulation of the hardware of the VGC causes a change in the performance or outcome of the VGC (i.e. performs a function outside normal operation).

- 14.2 The Gaming Operation/Gaming Enterprise shall develop a system of internal controls which shall protect the hardware, software and any other pertinent information relating to the forensic event or malfunction. Procedures shall contain, but not be limited to:
- 14.2.1 Notification to VGC Department Management, Security, Surveillance, and an OGR&C Compliance employee on duty;
 - 14.2.2 Handling of VGC, not resetting error conditions, not performing unnecessary game recalls, taking pictures of VGC screens prior to opening any doors, not closing any doors, with the VGC powered up, once they have been opened;
 - 14.2.3 Gathering of information and evidence, review, photograph and record all information needed with the initial VGC access, not playing the VGC for testing purposes and not attempting to test any peripheral hardware components (e.g. bill acceptors) while attached to the VGC, running current online system events and meters for the last 30 days including the exceptional event or malfunction, Information about any anomalies observed on the VGC, guest and Associate statements regarding their observations of the occurrence; and
 - 14.2.4 Securing the VGC, upon collection of available information, powering down the VGC and sealing the VGC with numbered tamper-evident tape across the door accesses.
- 14.3 Upon review of all collected data, OGR&C Management in conjunction with Property Management will determine if the game vendor and the ITL will be notified. The GRA reserves the right to send any software/hardware to an ITL if deemed necessary.
- 14.3.1 All outside communications regarding the forensic event will be shared with the above management.
 - 14.3.2 If any software/hardware will be removed from the VGC for further evaluation, the GRA shall notify the ITL of choice and complete the forensic submission.

15 VGC Tournaments

- 15.1 If a tournament system controller is used, access to the controller shall be password controlled, and any key shall be dual controlled or the area where the controller is secured shall be dual access. Any controller shall be equipped with a tournament program, approved by an ITL, which allows for tournament mode play. Tournament systems must be capable of producing reports containing, but not limited to, the following information:
- 15.1.1 Tournament name
 - 15.1.2 Name of entrant (guest)
 - 15.1.4 Tournament points accrued during play and
 - 15.1.6 No consideration (entry fee) can be required for entry into a VGC tournament.
- 15.2 Each VGC involved in the tournament shall be equipped with a tournament program, approved by an approved ITL, which allows for tournament mode play. The tournament option shall default to disabled. If tournament is an option, it shall be enabled by a GRA Board approved and controlled method requiring manual intervention and/or total replacement of the logic board with a tournament board which has been approved by an ITL. If the tournament is run on individual VGCs rather than through a tournament system controller, the same information required for a system report is required for each individual VGC.
- 15.3 VGCs, while enabled for tournament play, shall not accept credits from any source, nor pay out credits in any way, but shall utilize tournament credits/points only. Tournament credits shall have no cash value and shall be used to determine the point standings of participants involved in the tournament.

The tournament software shall not communicate any tournament related accounting information to the system.

15.4 All VGCs used in a single tournament shall utilize the same electronics and machine settings.