



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

September 12, 2024

**NOTICE OF INTENT  
TO ADOPT**

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

**Changes to:  
DETAILED GAMING REGULATION – 9 Class III Card Games**

Summary of changes to DGR-9 Class III Card Games includes:

1. Addition/enhanced of staffing and training requirements (Section 1)
2. Enhanced and expanded table game software standards (Section 2)
3. Enhanced and expanded fill and credit standards (Section 3)
4. Enhanced of opening and closing procedures (Section 5)
5. Enhanced and expanded playing card standards (Section 6)
6. Addition of shuffler standards (Section 7)
7. Addition of card game protection standards
8. Addition of standards for progressive pots standards (Section 9)
9. Addition of promotional pools and pots standards (Section 10)

Pursuant to 15 MLBSA § 305(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 8:00 a.m. on Monday, October 14, 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**.

  
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Gaming Regulatory Authority Board

9/12/2024  
Date



# **Mille Lacs Band of Ojibwe Indians**

*Gaming Regulatory Authority*

*Detailed Gaming Regulations*

## **DGR-9 Class III Card 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 card games.
- 1.4. At all times during the conduct of Class III Card 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 four 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.
  - 1.4.7. The staffing requirements for when a pit boss or floors supervisors are responsible for overseeing Table Games and Class III Card Games, must adhere to section 1.4.2 and 1.43 supervision standards.
- 1.5. Dealer, pit boss and floor supervisor for each class III card game offered shall have additional training sufficient to pass a proficiency test.
  - 1.5.1. Proficiency test must be documented prior to dealing or supervising of each individual class III card game.
- 1.6. For each card game offered for play, the Gaming Operation shall develop a system of internal controls which shall include, but is not limited to, the following:
  - 1.6.1. Rules of the card game.
  - 1.6.2. Method of dealing.
  - 1.6.3. Procedures for changing decks in games where cards are handled by players, with deck changes occurring after no more than four hours of use.

## 2. Class III Card Game Software Standards

- 2.1. The Gaming Operation 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 (ITL). The ITL 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 ITL report. When initially received, the software must be verified to be authentic copies, as certified by the ITL.
- 2.4. The Gaming Operation 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 ITL 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 and credit slips shall be in at least triplicate form and in a continuous, prenumbered 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 Operation 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 Operation shall develop a system of internal controls for computerized and manual credits 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 had custody of the items prior to transfer to the cage.
    - d. Pit supervisory personnel who supervised the credit transaction.
- 3.4. The Gaming Operation shall develop a system of internal controls for computerized and manual fill/credit voids 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. Pit supervisory personnel who supervised the credit transaction.

- 3.5. The Gaming Operation shall develop a system of internal controls for computerized and manual fill/credit voids that include but 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 transaction shall sign both the original and first copy.
  - 3.5.3. Voids shall be submitted to the accounting department for retention and accountability.

#### **4. Class III Card Game Inventory Standards**

- 4.1. At the close of each shift, for those table banks that were opened during the 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.
- 4.2. 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. Verification 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 Operation shall develop a system of internal controls for opening a card game, that include, but are not limited to the following:
  - 5.1.1. After receiving one or more sealed decks of cards at the table, the pit boss or floor supervisor shall open the sealed decks, then 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. The cards shall be spread out in horizontal fan shaped columns by deck according to suit and in sequence.
  - 5.1.3. 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.
  - 5.1.4. 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 difference between the closer and the opener shall be investigated and reported to Surveillance.
- 5.2. The Gaming Operation shall develop a system of internal controls for closing a card 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.
  - a. These cards shall be placed in a secure location prior to being placed in card storage area.

## **6. Class III Card Game Playing Card Standards**

- 6.1. The Gaming Operation shall develop a system of internal controls for inventory of class III Card Game playing cards that include, but are not limited to the following:

- 6.1.1. Procedure 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 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 and returned from tables.
  - iii. When cards are removed from play by the Gaming Operation.

- 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 associations, 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.
  - d. Method used for scoring, cancelling, and/or destroying used cards.
- 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. Class III Card Games 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.

## **7. Shuffler Standards**

- 7.1. The Gaming Operation 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 indication too many or not enough cards are present.
  - 7.1.3. A card being jammed in a shuffle.
  - 7.1.4. Replacing damaged cards.
- 7.2. Continuous shufflers, if used, shall include a brush or a security cover to protect the confidentiality of the cards.

## **8. Class III Card Game Protection Standards**

- 8.1. The Gaming Operation shall develop a system of internal controls for card games protections that include, but are not limited to the following:
  - 8.1.1. Security measures to prevent duplication of cheques or chips.
  - 8.1.2. Security and access restrictions to table game areas.
  - 8.1.3. Visible display of rules and payouts.
  - 8.1.4. Displays of betting limits at each table.
  - 8.1.5. Card game cheque/chips tray security.
  - 8.1.6. Manual rating processes, if an automatic rating system is not used.
  - 8.1.7. Equipment maintenance procedures for associated equipment including:

- a. Shuffler(s).
  - b. Progressive jackpot table game equipment.
  - c. Card cancelling equipment.
- 8.1.8. Dealer protocols including:
  - a. Dealer maintaining physical and visual control of the game.
  - b. Dealer uniform requirements.
  - c. Dealer shall not touch any cheques or chips on a dead game without a pit boss or floor supervisor present.
- 8.1.9. If a card or cards leaves the table surface cards shall be verified to ensure all cards are accounted for without damage or marking.
- 8.1.10. Cheques 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.
- 8.2. Table/felt design shall be submitted to the GRA for review and approval prior to installation.
- 8.3. The GRA shall be notified of any table floor moves at least seven (7) days prior to the move.

## **9. Class III Card Game Standards for Progressive Pots**

- 9.1. The Gaming Operation shall develop a system of internal controls for progressive pots that include, but are not limited to, the following:
  - 9.1.1. Nature of the progressive pool pot.
  - 9.1.2. The amount deposited in the progressive pot, whether per hand, per pot, or otherwise.
  - 9.1.3. How the progressive pot is won. What hand(s) are required, what circumstances required to win, etc.
- 9.2. Once a progressive pot is established, funds cannot be shared with any other pool or pot without prior GRA Board approval.
- 9.3. The Gaming Operation, with GRA approval, shall establish procedures covering payout of the progressive pot. These procedures shall include, but not limited to, the following:
  - 9.3.1. All funds contributed by players into the pots must be returned when won in accordance with the posted rules with no commission or administrative fee withheld.
- 9.4. Individual payouts for card games progressive 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:
  - 9.4.1. Date and time.
  - 9.4.2. Dollar amount of the payout or description of personal property.
  - 9.4.3. Reason for payout (e.g. promotion name).
  - 9.4.4. Signature of at least two (2) key associates verifying, authorizing, and completing the progressive 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.

9.4.5. Patron's name.

9.5. Rules governing progressive pots must be conspicuously posted or available in writing for patron review and must designate:

9.5.1. What type of hand it takes to win the pot.

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

9.5.3. Amount/percentage of funds allocated to primary and secondary pools (if applicable)

9.6. Progressive 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.

9.7. The amount of the pool or pot must be conspicuously displayed.

9.8. At least once each day that the game is offered, the posted pot amount must be updated to reflect the current pool or pot amount.

9.9. The Gaming Operation shall establish and comply with procedures for the transfer of progressive amounts in excess of the base reset amount to other awards or prizes. Such procedures may also include other methods of distribution that accrue to the benefit of the gaming public including approved promotions.

## **10. Class III Card Game Standards for Promotional Pools and Pots**

10.1. The Gaming Operation shall develop a system of internal controls for promotional pools and pots that include, but are not limited to, the following:

10.1.1. Nature of the promotional pool or pot.

10.1.2. The amount deposited in the promotional pot or pool, whether per hand, per pot, or otherwise.

10.1.3. How much is paid out, either amount or percentage of the promotional pool or pot, when the pool or pot is won.

10.2. Once a promotional pool or pot is established, funds cannot be shared with any other pool or pot without prior GRA Board approval.

10.3. The Gaming Operation, with GRA approval, shall establish procedures covering payout of the promotional pool or pot. These procedures shall include, but not limited to, the following:

10.3.1. 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.

10.3.2. The payout may be in the form of personal property.

10.3.3. A combination of a promotion and promotional pool or pot may be offered.

10.3.4. Payouts may also include other methods of distribution that accrue to the benefit of the gaming public via an award or prize.

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

- 10.4. The conditions for participating in current promotional pools, pots, and any related promotions, including drawings and giveaway programs, must be prominently displayed and available for patron review at the Gaming Operation.
- 10.5. Individual payouts for card games promotional 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:
  - 10.5.1. Date and time.
  - 10.5.2. Dollar amount of the payout or description of personal property.
  - 10.5.3. Reason for payout (e.g. promotion name).
  - 10.5.4. Signature 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.
  - 10.5.5. Patron's name.
- 10.6. If the cash (or cash equivalents) payout for the card game promotional 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).
- 10.7. Rules governing promotional pools and pots must be conspicuously posted or available in writing for patron review and must designate:
  - 10.7.1. How/when the contributed funds are added to the pool or pot,
  - 10.7.2. Amount/percentage of funds allocated to primary and secondary pools (if applicable)
- 10.8. Promotional pool and pot contribution 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.
- 10.9. The amount of the pool or pot must be conspicuously displayed.
- 10.10. 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.
- 10.11. The Gaming Operation shall establish and comply with procedures for the transfer of promotional amounts in excess of the base reset amount to other awards or prizes. Such procedures may also include other methods of distribution that accrue to the benefit of the gaming public including approved promotions.

## History

Approved by GRA Board on XXX XX, 2024.