



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

July 24, 2025

**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 – 17 Standards for Key Control**

Summary of changes to DGR-17 Standards for Key Control includes:

1. Enhanced standards between key custodian and locksmith (Section 1)
2. Addition of access control card standards (Section 1)
3. Addition of notification requirement to the GRA for sensitive key shipments (Section 1)
4. Addition of sensitive key cutting standards (Section 2)
5. Addition of requirement for properties to define restricted keys (Section 6)
6. Addition of annual audit independent of Security for all sensitive and restricted keys (Section 7)
7. Addition of stipulation that broken and damaged keys have the same access requirements as active keys (Section 8)
8. Addition of stipulation for the use of electronic key control logs (Section 9)
9. Enhanced controls for kiosk keys kept in Main Bank (Section 12)
10. Addition of lock destruction standards (Section 16)

Pursuant to 15 MLBSA § 305(b)(2)(A): 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, August 25<sup>th</sup>, 2025**, 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**.

A handwritten signature in black ink, appearing to be "J. Pomerleau", is written over a horizontal line.

Gaming Regulatory Authority Board

07/24/2025

Date