



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR-7c Standards for Pull Tabs

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1. Pull Tab General

- 1.1. Supervision shall be provided as needed for pull tab operations and over pull tab storage areas by associates with authority equal to or greater than those being supervised.
- 1.2. Pull tabs shall be maintained in a secure dual access location with surveillance coverage adequate to identify associates accessing the area and shall be restricted to authorized associates.
- 1.3. The rules shall be displayed or available for patron review at the Gaming Enterprise, including rules governing play, prize payouts, and redemption timeframes.
- 1.4. The operation must establish, as approved by the GRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.#
- 1.5. The Gaming Enterprise shall develop internal controls standards for the calibration of pull tabs scales.
- 1.6. Standards for pull tabs statistical reporting are found in DGR- Accounting and Revenue Audit

2. Pull Tab Cashier Funds

- 2.1. All funds used to operate the pull tab game shall be:
 - 2.1.1. Accounted for and recorded on an accountability form
 - 2.1.2. Counted independently by at least two (2) associates
 - 2.1.3. Reconciled to the recorded amounts at the end of each shift or session
- 2.2. All transfers of cash and/or cash equivalents must be verified.
- 2.3. Unverified transfers of cash and/or cash equivalents are prohibited.

3. Pull Tab Inventory

- 3.1. The Gaming Enterprise shall develop a system of internal controls for pull tab inventory including controls for storage location(s), sales location(s), and cashier inventories. The system of internal controls for pull tab inventory shall include, but not be limited to the following:
 - 3.1.1. All pull tab inventories, including issued and non-issued pull tabs shall be controlled to assure the integrity of the pull tabs.
 - 3.1.2. Transfers of pull tabs from storage to the pull tab booth cashier or sales location shall be secured and independently controlled.
 - 3.1.3. Pull tabs exchanged between the pull tab booth to another sales location shall be secured.
 - 3.1.4. Pull tab inventory shall be controlled by associates independent of pull tab sales.
 - 3.1.5. The issue of pull tabs to the pull tab booth cashier or sales location shall be documented with the following:
 - a. Date issued
 - b. Name and signature of associate issuing pull tabs
 - c. Name and signature of associate receiving pull tabs
 - d. Serial number of the pull tabs issued.
 - e. Increases or decreases to pull tab inventory shall be:

- i. Recorded
- ii. Tracked
- iii. Reconciled

3.1.6. Pull tabs associated with an investigation shall be retained intact and stored in a dual access area outside of the established removal and cancellation policy. The inventory of pull tabs associated with investigation shall be tracked and logged from receipt until use or permanent removal from inventory.

4. Pull Tab Sales

- 4.1. Records of pull tab sales and voids shall be maintained.
- 4.2. Pull tab sales and voids shall be tracked and reconciled.
- 4.3. Manually recorded total sales shall be verified by an associate independent of the pull tab sales being verified.
- 4.4. Unrestricted access to pull tab sales records shall be prohibited.

5. Pull Tab Payouts

- 5.1. Pull tab payouts shall be recorded.
- 5.2. Redeemed pull tabs and pull tab payouts shall be tracked and reconciled.
- 5.3. Total payouts shall be computed and recorded by shift.
- 5.4. Appropriate documentation shall be given to the redemption booth for purposes of determining if the winner purchased the pull tab from the pull tabs issued by the Gaming Enterprise. Electronic verification shall satisfy this requirement.
- 5.5. Winning pull tabs shall be verified and paid as follows:
 - 5.5.1. The redeemed pull tabs shall be defaced so that the pull tab cannot be redeemed for payment again. Pull tabs that are uniquely identifiable with a machine readable code (including, but not limited to a barcode) may be redeemed, reconciled, and stored by kiosks without the need for defacing, so long as the redeemed pull tabs are secured and destroyed after removal from the kiosk in accordance with the procedures approved by the GRA.
 - 5.5.2. At least two (2) associates, one (1) of whom must be a Key associate, must document and verify all prize payouts \$600 and above. An electronic method may substitute for one (1) verification.
 - 5.5.3. Prize payouts of \$1,200 or above must be verified and documented by at least two (2) associates, one (1) of whom must be a supervisory or management associate from a department independent of the Table Games Department.

6. Disposal or Destruction of Pull Tabs

- 6.1. The Gaming Enterprise shall develop a system of internal controls for the destruction of pull tabs that shall include, but is not limited to, the following:
 - 6.1.1. A brief explanation of the method of destruction
 - 6.1.2. Name of associate or entity responsible for the destruction

- 6.1.3. Timelines for destruction for both winning and losing pull tabs
- 6.2. The following shall be logged for all destroyed pull tabs:
 - 6.2.1. Name of the Gaming Enterprise where the pull tabs are being disposed from
 - 6.2.2. Type, amount, and name of the manufacturer of the pull tabs
 - 6.2.3. Unique identification number
 - 6.2.4. Date and source of original acquisition
- 6.3. The Gaming Enterprise shall develop a system of internal controls for the disposal of pull tabs that shall include, but is not limited to, the following:
 - 6.3.1. A brief explanation of the method of disposal
 - 6.3.2. Name of the Gaming Enterprise where the pull tabs are being disposed from
 - 6.3.3. Type, amount, and name of the manufacturer of the pull tabs
 - 6.3.4. Unique identification number
 - 6.3.5. Date and source of original acquisition
- 6.4. The GRA may require an OGR&C associate to be present at the destruction or disposal of pull tabs.
- 6.5. The GRA may require the destruction of the pull tabs to be video recorded.
- 6.6. All documentation of destroyed and disposed pull tabs must be maintained for at least two (2) years by the Gaming Enterprise and shall be available upon request.
- 6.7. The GRA shall be notified of any variation of approved procedures for destruction or disposal of pull tabs.

History

Approved by Band Assembly on December 13, 2005.

Changes approved by the GRA Board on August 29, 2006. Effective Date: August 29, 2006.

Changes approved by the GRA Board on August 23, 2007. Effective Date: August 23, 2007.

Changes approved by the GRA Board on March 11, 2008. Effective Date: March 11, 2008.

Changes approved by the GRA Board on December 17, 2013. Effective Date: October 1, 2014.

Changes approved by the GRA Board on September 21, 2023. Effective Date: September 21, 2023.

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