



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR-16 Promotions and Complimentary Standards

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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.
 - d. 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 July 11, 2024. Effective Date: January 1, 2025.

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