



Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority
Detailed Gaming Regulations

DGR-13a Main Bank and Cage

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1. Cage, Main Bank, Vault, and Kiosk General Standards

- 1.1. Supervision shall be provided for cage, main bank, and other operations using cash or cash equivalents by an associate(s) with authority greater than those being supervised.
- 1.2. The physical access to the cage, main bank, and areas where cash or cash equivalents are stored shall be restricted to the following:
 - 1.2.1. Authorized cage associates.
 - 1.2.2. Other authorized gaming associates.
 - 1.2.3. Authorized vendors, auditors, emergency personal, etc. as needed for business purposes.
- 1.3. The Gaming Enterprise shall develop a system of internal controls for the transporting of extraneous items in and out of the secure cage and main bank areas including, but not limited to, the following:
 - 1.3.1. What items are specifically allowed.
 - 1.3.2. Designated approved locations for extraneous items.
 - 1.3.3. Surveillance notification.
 - 1.3.4. Access to personal items during shift.
 - 1.3.5. Security checks of items that are not easily visible to surveillance.

2. Cash Handling Bank Accountability Standards

- 2.1. The Gaming Enterprise shall develop a system of internal controls for the accountability of funds within the Cash Handling Banks.
 - 2.1.1. Cash Handling Banks shall include, but not be limited to the following:
 - a. Cashier window banks.
 - b. Main bank(s).
 - c. Employee window banks.
 - d. Kiosk banks.
 - e. Banks used for promotional payouts.
 - f. Other banks processed through the cage or main bank.
 - 2.1.2. Unverified transfers or exchanges of cash and/or cash equivalents are prohibited.
- 2.2. The Gaming Enterprise shall establish whether each Cash Handling Bank will be an imprest bank or a floating bank within the system of internal controls.
 - 2.2.1. For imprest banks, the Gaming Enterprise shall notify the GRA of bank amounts for each imprest bank.
 - 2.2.2. The GRA shall be notified if a change is made from imprest to floating or floating to imprest.
- 2.3. All transactions that flow through the cage and Cash Handling Banks shall be summarized for each work shift of the cage and shall be supported by documentation.

- 2.3.1. Increases and decreases to the total cage inventory and each Cash Handling Bank shall be verified, supported by documentation, and recorded.
- 2.3.2. Documentation for increases or decreases of any amount to the total cage inventory and each Cash Handling Bank shall include the following:
 - a. Date.
 - b. Shift.
 - c. Purpose of the increase/decrease.
 - d. Associate(s) completing the transaction.
 - e. Associate or department receiving or returning the cage funds.
- 2.3.3. Documentation for even exchanges or transfers of any amount between Cash Handling Banks shall include the following:
 - a. Date.
 - b. Shift.
 - c. Cashiering location.
 - d. Types of instruments (cash, coin, check, chips, cashless tickets etc.).
 - e. Signatures of associates completing the even exchange transaction.
- 2.4. Cash Handling Bank inventories shall be counted independently by at least two (2) associates.
 - 2.4.1. The associates must make individual counts to compare for accuracy and maintain individual accountability.
 - 2.4.2. Independent counts shall be attested to by signature and recorded in ink or other permanent form at the beginning and end of each shift during which the activity took place.
- 2.5. The Gaming Enterprise shall develop a system of internal controls for the investigation of Cash Handling Bank variances including retention timeframe. Variance documentation shall include but not be limited to the following:
 - 2.5.1. Associate(s) involved.
 - 2.5.2. Associate investigating.
 - 2.5.3. Cashier location.
 - 2.5.4. Cause or investigation result.
 - 2.5.5. Variances investigation findings to determine the cause of the variance shall be provided to the GRA upon conclusion of the investigation not to exceed 30 days.
- 2.6. The Gaming Enterprise shall develop a system of internal controls to organize the Cash Handling Banks including the following:
 - 2.6.1. Organization of the currency and coin.
 - 2.6.2. Organization of chips.

- 2.6.3. Organization of checks and other monetary instruments.
- 2.6.4. Organization of non-cash valued instruments, i.e., gift cards, promotional coupons, etc.
- 2.6.5. General organization of workstations where cash handling occurs.
- 2.7. Cash handling shall be restricted unless completing a transaction.

3. Financial Institution (Bank) Deposit Standards

- 3.1. The Gaming Enterprise shall develop a system internal control for deposits to a financial institution (bank), including, but not limited to, the following:
 - 3.1.1. Procedures for the preparation of funds for deposit to the bank.
 - 3.1.2. Procedures for the verification of funds prepared for deposit, including cash, coin, and checks (as applicable), including signatures to evidence verification.
 - 3.1.3. Procedures for mutilated money.
 - 3.1.4. Documentation requirements to evidence the deposit to the bank.
 - 3.1.5. Security escort procedures

4. Chip Standards

- 4.1. The Gaming Enterprise shall develop a system of internal controls to ensure accountability and accuracy of chip inventory.
 - 4.1.1. The system of internal controls shall include procedures for the following (hereafter, "Chip Situations"):
 - a. Purchase of chips.
 - b. Receipt of chips.
 - c. Storage and inventory controls for chips, including frequency of inventory counts.
 - d. Retirement of chips.
 - e. Destruction of chips.
 - 4.1.2. The GRA shall be notified of each Chip Situation in which the Gaming Enterprise engages with a third-party vendor prior to the finalization of contractual agreements. These Chip Situation notifications shall include the following:
 - a. Timing of the event (e.g., receipt, destruction, etc.).
 - b. Description of the planned controls unique to the event and/or vendor.
 - 4.1.3. The system of internal controls shall include the following for each Chip Situation:
 - a. Associates and/or management involved.
 - b. Level of verification and documentation required.
 - 4.1.4. The GRA shall be present to witness the receipt and destruction of chips.

- 4.2. Chip designs and security features shall be submitted to the GRA for review and approval prior to purchase.
- 4.3. All reserved chips, including retired chips, shall be counted on a quarterly basis.
 - 4.3.1. If reserve chips are verified and sealed, verification of the validity of the seal shall suffice for quarterly verification.
 - 4.3.2. Sealed chips shall be opened and re-verified at least annually.

5. Cashless Ticket Standards

- 5.1. Each cashless ticket shall be verified for authenticity prior to redemption. Controls should include:
 - 5.1.1. Date.
 - 5.1.2. Time.
 - 5.1.3. Location.
 - 5.1.4. Retention timeframe.
- 5.2. Payout amounts shall be verified by the Cashier to ensure patron is paid the appropriate amount if the cashless ticket is valid.
- 5.3. The Gaming Enterprise shall establish a level at which a supervisory associate is required to verify the validity of the cashless ticket prior to payment.
- 5.4. Cashless tickets shall be retained for a minimum of 24 hours as evidence of payment documentation and for reconciliation purposes.
- 5.5. Documentation of the payment of a claim on a cashless ticket that is not physically available or a cashless ticket that cannot be validated such as a mutilated, expired, lost, or stolen cashless ticket shall be maintained to include:
 - a. Time of event.
 - b. Location (Bank and stand).
 - c. Machine number.
 - d. Name and badge number of authorizing Associate.
 - e. Reason.
- 5.6. The Gaming Enterprise shall develop a system of internal controls in the event the host validation computer system temporarily goes down, that shall include at least the following:
 - 5.6.1. Authorization for cashiers to redeem cashless tickets up to \$500.00 or a lesser amount as established within the system of internal controls.
 - 5.6.2. Verification process for tickets over \$500.00 or lesser amount to include supervisory authorization.
 - 5.6.3. Documentation of the following information for each cashless ticket paid out while the system was down to include time, location, and retention of documentation.:
 - a. Serial number of the cashless ticket.

- b. Date and time.
 - c. Dollar amount.
 - d. Issuing gaming machine number.
- 5.6.4. Process for marking the cashless ticket as “paid”.
- 5.6.5. Cashless tickets shall be validated as expeditiously as possible when the slot data system is restored.
- 5.6.6. Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The accounting department will maintain the voided voucher, if available.

6. Unclaimed Jackpot Standards

- 6.1. The Gaming Enterprise shall develop a system of internal controls for unclaimed jackpot payouts, including but not limited to the following:
- 6.1.1. Record keeping requirements for cage accountability.
 - 6.1.2. Payout authorizations.
 - 6.1.3. Record keeping requirements for accounting of the liability and the payout.
 - 6.1.4. Surveillance notification.

7. Named Credit Instrument Standards

- 7.1. The Gaming Enterprise shall develop a system of internal controls for the examination and documentation procedures required by the third-party check cashing or guarantee service, as applicable.
- 7.2. The Gaming Enterprise shall develop a system of internal controls for named credit instruments for purposes of security and integrity that include, but are not limited to the following:
- 7.2.1. Acceptance of named credit instruments, including controls to:
 - a. Verify the patron's identity.
 - b. Verify the patron's check cashing authority.
 - c. Record the source and results of the verification of patron's check cashing authority
 - d. Examine the check to ensure it includes:
 - i. The patron's name.
 - ii. Current address.
 - iii. Signature of the patron.
 - 7.2.2. Collecting and recording checks returned to the gaming operation after deposit.
 - 7.2.3. Re-deposit of returned checks.
 - 7.2.4. Write-off authorization process.
- 7.3. A reasonable effort shall be made to verify the authenticity of payroll checks.

- 7.4. The following shall be included on the counter check, upon issuance:
 - 7.4.1. The patron's name and signature.
 - 7.4.2. The dollar amount of the counter check (both alpha and numeric).
 - 7.4.3. Patron's bank name, bank routing number, and account number.
 - 7.4.4. Date of issuance.
 - 7.4.5. Signature of the person approving the counter check transaction.
- 7.5. Guaranteed drafts (i.e., traveler's checks, cashier's checks, etc.) shall be accepted in accordance with the examination and documentation procedures required by the issuer of the guaranteed drafts.
- 7.6. Named credit instruments that are drawn on a charity, trust, religious origination, or electronic benefit transfer (EBT) shall be prohibited.

8. Named Credit Instrument Definitions

- 8.1. Personal Check - a check drawn against funds deposited in your personal checking account.
- 8.2. Cashier's Check - a check issued by a bank to a third party on behalf of a customer, who pays the bank the face value of the check.
- 8.3. Payroll Checks - a check issued in payment of wages or salary.
- 8.4. Counter Checks - a form provided by the gaming operation for the customer to use in lieu of a personal check.
- 8.5. Traveler's Checks - a draft purchased from a bank or express company and signed by the purchaser at the time of purchase and again at the time of cashing as a precaution against forgery.
- 8.6. Band Issued Checks - a check issued by the Mille Lacs Band of Ojibwe tribal government.
- 8.7. Tax Refund Checks - a reimbursement to a taxpayer of any excess amount paid to the federal government or a state government.

9. Patron Deposited Funds

- 9.1. If patrons are allowed to deposit funds at the cage, the following standards apply.
- 9.2. Only cash shall be accepted from patrons for the purpose of a patron deposit. Cash equivalent's must be cashed prior to deposit.
- 9.3. The Gaming Enterprise shall develop a system of internal controls for all deposits and withdrawals, which shall include the following:
 - 9.3.1. Verification of the patron's identity, including photo identification requirements.
 - 9.3.2. Recording of each deposit/withdrawal on a cage accountability form on a per-shift basis.
 - 9.3.3. Required signatures attesting to the accuracy of the information contained on the deposit or withdrawal form.
- 9.4. Documentation requirements for the deposit and withdrawal of funds shall include:
 - 9.4.1. Deposit and withdrawal forms shall be two (2) part.

- a. One (1) copy of the deposit/withdrawal document shall be provided to the patron as receipt of the transaction.
 - b. One (1) copy of the deposit/withdrawal document shall be retained by the cage for reconciliation purposes and support of the transaction.
- 9.4.2. The deposit/withdrawal documentation shall contain the following information:
- a. Same receipt number on each copy.
 - b. Patron's name and signature.
 - c. Designation of deposit or withdrawal.
 - d. Date of deposit and/or withdrawal.
 - e. Dollar amount of deposit/withdrawal.
 - f. Name and signature of the associate who conducted the transaction.
- 9.5. A detailed record by patron name and date of all funds on deposit shall be maintained.
- 9.6. A current balance of all patron deposits that are in the cage/main bank accountability shall be maintained.
- 9.7. The current balance with the deposits and withdrawals shall be reconciled at least daily.
- 9.8. Rules governing patron deposited funds including but not limited to:
- 9.8.1. Time limits on which funds may remain on deposit.
 - 9.8.2. The retention period for inactive deposits.
 - 9.8.3. Disposition of funds not withdrawn.
- 9.9. Rules governing patron deposited funds must be posted or provided to guest upon deposit.

10. Kiosk Standards

- 10.1. Kiosks standards shall apply to devices used to receive or dispense cash to employees or patrons, including but not limited to the following activities:
- 10.1.1. Patron activities
 - a. Ticket redemptions.
 - b. ATM transactions (if the kiosk funds are filled by the Gaming Enterprise).
 - c. Cash for cash exchanges.
 - 10.1.2. Associate activities
 - a. Issuance and return of employee cashing banks (i.e., currency recyclers).
 - b. Slot Department payout transactions at a jackpot dispensing kiosk.
- 10.2. The Gaming Enterprise shall develop a system of internal controls for physical controls for kiosks that include, but are not limited to the following:
- 10.2.1. Notification of Surveillance every time a Kiosk is entered.

- 10.2.2. List of authorized gaming positions.
 - 10.2.3. Controls for vendor access.
 - 10.2.4. Controls for detection of forced entry.
 - 10.2.5. Controls for evidence of any entry.
 - 10.2.6. Protection of circuit boards containing programs.
- 10.3. The Gaming Enterprise shall establish internal controls to ensure communications between the kiosk and the system are secure and functioning.
- 10.4. The maximum amount for a cashless ticket to be redeemed by a patron at a kiosk shall not exceed \$1,999.99 per cash-out transaction.
- 10.5. The Gaming Enterprise shall establish a system of internal controls for jackpot dispensing kiosks and currency recyclers used for employee transactions, including but not limited to the following:
- 10.5.1. Thresholds of the dispensing of funds (e.g., maximum dollar amount of jackpot that can be issued from a kiosk used for jackpots, standard bank amounts for the recycler, etc.).
 - 10.5.2. Limitations on how long funds issued from the currency recyclers can be outstanding before management is notified.
 - 10.5.3. Reconciliation of issuances and receipts of employee transactions at each kiosk.
- 10.6. The Gaming Enterprise shall develop a system of internal controls for the accountability of Kiosk currency cassette funds, which shall include at least the following:
- 10.6.1. Kiosk inventory shall be maintained on cage accountability and must be counted independently by at least two (2) associates, documented, and reconciled for each increase or decrease to the kiosk inventory.
 - 10.6.2. Kiosks cassettes shall be counted and filled by a gaming associate and verified independently by another gaming associate prior to being secured.
 - 10.6.3. Prepared and verified Kiosk cassettes shall be secured by lock or tamper resistant seal.
 - 10.6.4. All gaming associates involved with the preparation and verification of the Kiosk cassette shall sign each cassette's accountability documentation.
 - 10.6.5. Kiosk currency cassettes shall be stored in a designated and secured area until placed in a kiosk.
- 10.7. The Gaming Enterprise shall develop a system of internal controls for fills and credits including at least the following:
- 10.7.1. Procedures for security over the transportation of cassettes and reject boxes during the fill and credit process.
 - 10.7.2. Two (2) gaming associates shall be involved in the fill process, one (1) of whom shall be independent of the cage.
 - a. The kiosk shall be tested once the new cassettes have been placed into the kiosk.
 - b. Kiosk fill documentation standards shall include the following:

- i. Sufficient documentation to evidence the fill decrease to the Cash Handling Bank inventory including:
 - (1) Kiosk number filled.
 - (2) Seal number(s), if applicable, of Kiosk cassette(s) used during the fill.
 - (3) Dollar amount of each fill per cassette by denomination for each Kiosk.
 - (4) Dollar amount of each fill in total by denomination.
 - ii. Signature of all participating gaming associates involved with the Kiosk fill.
- 10.7.3. Kiosk cassette(s) and reject box(es) included in the credit will be independently verified by two (2) associates. Kiosk credit documentation standards shall include the following:
 - a. Sufficient documentation to evidence the credit increase to the Cash Handling Bank inventory including:
 - i. Kiosk number dropped during the credit process.
 - ii. Seal number(s), if applicable, of Kiosk cassette(s).
 - iii. Dollar amount dropped per cassette and reject box by denomination for each Kiosk.
 - iv. Dollar amount of each credit in total by denomination.
 - b. Signature of all participating associates verifying the Kiosk credit.
- 10.8. The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted within the system of internal controls):
 - 10.8.1. Starting balance dollar amount per financial instrument.
 - 10.8.2. Starting balance number of items per financial instrument.
 - 10.8.3. Dollar amount per financial instrument issued.
 - 10.8.4. Number of items per financial instrument issued.
 - 10.8.5. Dollar amount per financial instrument redeemed.
 - 10.8.6. Number of items per financial instrument redeemed.
 - 10.8.7. Dollar amount per financial instrument increases.
 - 10.8.8. Number of items per financial instrument increases.
 - 10.8.9. Dollar amount per financial instrument decreases.
 - 10.8.10. Number of items per financial instrument decreases.
 - 10.8.11. Ending balance dollar amount per financial instrument.
 - 10.8.12. and Ending balance number of items per financial instrument.

- 10.9. The Gaming Enterprise shall develop a system of internal controls for the drop of Kiosks that include the following:
- 10.9.1. All Kiosk bill validator boxes (BVB's) shall be removed at the time(s) as designated by the Gaming Enterprise and reported to the GRA, except for kiosk fills and credits.
 - 10.9.2. Full floor Kiosk drops shall be performed no less frequently than once a month.
 - 10.9.3. Surveillance shall be notified when the Kiosk drop, or count is to begin.
 - 10.9.4. Procedures for security over the transportation of bill validator boxes (BVBs) during the drop process.
 - 10.9.5. Two (2) gaming associates shall be involved in the drop process, one (1) of whom shall be independent of the cage.
 - 10.9.6. Redeemed vouchers and pull tabs (if applicable) collected from the kiosk must be secured and delivered to the appropriate department for reconciliation.

History

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

Each Gaming Enterprise shall come into compliance with changes no later than October 1, 2023.