



Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Detailed Gaming Regulations

STANDARDS FOR TABLE GAMES

Document No. DGR – 10

Effective: July 6, 2011

I. GAME REGULATIONS APPLICABLE TO BLACKJACK.

Section 1. A Gaming Enterprise shall comply with all requirements set forth in the Tribal/State Compact and all subsequent technical amendments governing blackjack.

Section 2. A Gaming Enterprise shall set rules specifically governing the following game play:

- A. Surrender;
- B. Insurance wager;
- C. Even money;
- D. Doubling down;
- E. Splitting pairs; and
- F. Over/under 13.

Section 3. Such rules shall be made available to any player upon request. A concise yet accurate description of such rules shall be conspicuously posted at the location where blackjack is being played.

II. SOFTWARE VERIFICATION

Section 1. The Gaming Enterprise shall establish and implement procedures that restrict access to employees for the controlled gaming equipment/components.

Section 2. The game software components will be identified in the test laboratory report. When initially received, the software must be verified to be authentic copies, as certified by the independent testing laboratory.

Section 3. The GRA shall establish and implement procedures relating to the inspection, shipment, testing, and documentation of gaming equipment/components, including but not limited to:

- A. Software must be authenticated prior to placement into play and semi-annually by an employee independent of Table Games operations by comparing signatures against the test laboratory letter on file with the GRA for that version.
- B. The manufacturer must provide specialized equipment or the services of an independent technical expert to assist with the testing, examination and analysis.

III. FILL AND CREDIT STANDARDS.

Section 1. Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.

Section 2. Manual unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Associates from the cashier or pit departments shall have no access to the secured (controlled) copies of the fill/credit slips. For computerized systems, one part shall be stored in the computer system in such manner that prevents pit, cage and other unauthorized persons from accessing and making changes to the stored information.

Section 3. When a fill/credit slip is voided, the cashier shall clearly mark “void” across the face of the original and first copy, the cashier and one other person independent of the transactions shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.



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Section 4. Fill/credit transactions shall be authorized by pit supervisory Associates before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where the fill slip is prepared.

Section 5. At least three parts of each fill/credit slip shall be utilized as follows:

A. For fills slips:

1. One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box.
2. One part shall be retained in the cage for reconciliation of the cashier bank; and
3. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.

B. For credit slips:

1. One part shall be transported to the pit by the runner who brought the credit from the pit to the cage, and after the appropriate signatures are obtained, deposited in the table game drop box.
2. One part shall be retained in the cage for reconciliation of the cashier bank; and
3. For computer systems, one part shall be stored in the computer system. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.

Section 6. For All Band Gaming Enterprises, the part of the fill/credit 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).

Section 7. The table number, shift, and amount of fill/credit by denomination and in total shall be noted on all copies of the fill/credit slip. The correct date and time shall be indicated on at least two copies.

Section 8. All fills/credits shall be carried from the cashier's cage by a person who is independent of the cage or pit.

Section 9. The fill/credit 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 chips, tokens, or cash equivalent, or prepared the credit slip and received the chips, tokens, and/or monetary equivalents transferred from the pit;
- B. Runner who carried the chips, tokens, or cash equivalents from the cage to the pit, or carried the chips, tokens, and/or monetary equivalents transferred from the pit to the cage and returned to the pit with the credit slip;
- C. Dealer who received the chips, tokens, or cash equivalents at the gaming table, or relinquished the chips, tokens, and/or monetary equivalents for transfer to the cage; and
- D. Pit supervisory personnel who supervised the fill/credit transaction.

Section 10. Fills/credits shall be broken down and verified by the dealer in public view before the dealer places the fill in the table tray or prior to placing them in racks for transfer to the cage, as applicable.

Section 11. 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.



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Section 12. Chips, tokens, 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.

Section 13. Cross fills (the transfer of chips between table games) and even cash exchanges are prohibited in the pit.

IV. TABLE INVENTORY FORMS.

Section 1. At the close of each shift, for those table banks that were opened during that shift:

- A. The table's chip, token, and coin inventory shall be counted and recorded on a table inventory form; or
- B. 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.

Section 2. If the table banks are not maintained on an imprest basis, beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.

Section 3. The accuracy of inventory forms prepared at shift end shall be verified by the outgoing pit supervisor and the dealer. Alternatively, if the dealer is not available, such verification may be provided by another pit supervisor or another supervisor from another gaming department. Verifications shall be evidenced by signature on the inventory form.

Section 4. If inventory forms are placed in the drop box, such action shall be performed by a person other than a pit supervisor.

V. TABLE GAMES COMPUTER GENERATED DOCUMENTATION STANDARDS.

Section 1. The computer system shall be capable of generating adequate documentation of all information recorded on the source documents and transaction detail (e.g., fill/credit slips, etc.).

Section 2. This documentation shall be restricted to authorized Associates.

Section 3. The documentation shall include, at a minimum:

- A. System exception information (e.g., appropriate system parameter information, corrections, voids, etc.); and
- B. Associates access listing, which includes, at a minimum:
 - 1. Associates name or Associates identification number (if applicable); and
 - 2. Listing of functions Associates can perform or equivalent means of identifying the same.

VI. STANDARDS FOR PLAYING CARDS.

Section 1. New and used playing cards to be issued to a table shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.

Section 2. Used cards that are not to be reused shall be maintained in a secure location until promptly marked, scored, or destroyed. Promptly is a period not to exceed seven (7) days. This standard shall not apply where playing cards are retained for an investigation.

Section 3. A card control log shall be maintained that documents when cards are received on site, distributed to and returned from tables and removed from play by the gaming operation.

VII. BLACKJACK CONTESTS AND TOURNAMENTS.

Section 1. Entry fees and prize payouts shall be summarized on a cash accountability document on a daily basis.



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Section 2. Entry fee and payout transactions shall be recorded on a document that includes the following:

- A. Customer's name;
- B. Date of entry/payout;
- C. Dollar amount of entry fee/payout (both alpha and numeric, or unalterable numeric) and/or nature and dollar value of any noncash payout;
- D. Signature of two (2) individuals attesting to the receipt or disbursement of the entry fee/payout with the customer; and
- E. Name of contest/tournament.

Section 3. Contest/tournament entry fees and payouts shall be summarized and posted to the accounting records on at least a monthly basis.

Section 4. Contest/tournament rules are to be included on all entry forms/brochures or prominently displayed and available for customer review upon request. At a minimum, the rules must include:

- A. All conditions customers must meet to qualify for entry into, and advancement through, the contest/tournament;
- B. Specific information pertaining to any single contest/tournament, including the dollar amount of money placed into the prize pool;
- C. The distribution of funds based on specific outcomes;
- D. Name of the organization(s) that conducted the contest/tournament on behalf of, or in conjunction with, the gaming operation, if applicable.

Section 5. Results of each contest/tournament shall be recorded and available for participants to review. The recording shall include the name of the event, date(s) of event, total number of entries, dollar amount of entry fees, total prize pool, and the dollar amount paid for each winning category. The name of each winner is shall be recorded and maintained but not available to the participants.

Section 6. The gaming operation shall establish and comply with procedures defining a retention period to maintain the information.

VIII. COMPUTERIZED PLAYER TRACKING SYSTEMS.

Section 1. The following standards apply only to computerized player tracking systems that accumulate points that are subsequently redeemed by the customer for cash, merchandise, etc.

Section 2. The addition/deletion of points to player tracking accounts other than through an automated process related to actual play must be sufficiently documented (including substantiation of reasons for increases) and authorized or performed by supervisory personnel of the player tracking, promotions, or table games departments.

- A. The addition/deletion of points to player tracking accounts authorized by supervisory personnel shall be documented and randomly verified by accounting/audit personnel on at least a quarterly basis.
- B. The above requirements do not apply to the deletion of points related to inactive or closed accounts through an automated process.

Section 3. Employees who redeem points for patrons shall not have access to inactive or closed accounts without supervisory personnel authorization. Documentation of such access and approval shall be created and maintained.



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Section 4. Customer identification shall be required when redeeming points for cash or at any time points are being redeemed without a player tracking card.

Section 5. Changes to the player tracking system parameters, such as point structures and employee access, must be performed by supervisory personnel independent of the table games department. Alternatively, changes to player tracking system parameters may be performed by table games supervisory personnel if sufficient documentation is generated and the propriety of the changes is randomly verified by personnel independent of the table games department on a quarterly basis.

Section 6. Rules and policies for player tracking accounts including the awarding, redeeming and expiration of points shall be prominently displayed or available for customer review at the gaming operation.

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