

SECTION 10
TOURNAMENTS

10.1 Authorization of Tournaments

- A. Any casino operation under the jurisdiction of the CNGC may not operate any tournament without prior approval of the CNGC.
- B. General rules dictating the play of any game offered in tournament format, as approved by the CNGC, shall continue to apply unless otherwise requested and approved by the CNGC.
- C. The CNGC or the casino operation as approved by the CNGC shall establish rules and regulations regarding the conduct of all tournament games.
- D. The casino operation may request tournament play for only those games already approved for the operation within the operation.
- E. General tournament rules and regulations as approved by the CNGC shall be posted near the tournament location and be made available upon request to tournament participants.
- F. Tournament structures shall be submitted for approval by the CNGC; the Director of the CNGC may provide approval, on a limited basis, to be affirmed by the CNGC Chairman, prior to the advertisement and/or commencement of game play.
- G. Standard tournaments may be offered by the casino operation upon approval with notice

provided to the CNGC of dates, fee, wagering requirements, prizes, and/or prize structures.

- H. Any variations to game play contrary to advertisement and/or posted rules and regulations may result in fines and/or license suspension/revocation.

10.2 Tournament Definition

Tournament – A championship game or series of games wherein the participants compete for the same prize(s) and start with an equal number of chips, credits, or other wagering instrument. Winners are determined as defined by the game objective (i.e. the most chips/points/credits) and prizes may be paid from a common pool.

- A. **Standard Tournaments** – tournaments offered under the same conditions, format, rules and regulations, and prize structure on a regular basis, whereas the prize pool is directly funded by the participants.
- B. **Promotional Tournaments** – tournaments offered for play under promotion terms, whereas the prize pool is not directly funded by the participants and is offered as a reward or incentive to participate in other game offerings.
- C. **Special Tournaments** – tournament offered which different form standard tournaments in terms of conditions, format, rules and regulations, and prize structure (i.e. tiered tournaments, sponsored

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tournaments, satellites, etc.). The prize pool is funded directly by the participants.

- D. **Tiered Tournaments** – tournaments spread over a period of time that may include qualifying, semi-final, and championship rounds.
- E. **Satellites** – smaller tournaments where primary prizes are the opportunity to participate in a large tournament.
- F. **Free Roll Tournament** – tournaments with a nominal and/or no entry fee or initial buy-in.
- G. **Sit & Go's** – short term, single table tournaments, the game starts at the same time for all participants.
- H. **Freeze-out** – a tournament format wherein the participants are not allowed to re-buy.
- I. **Re-buys** - additional fees paid by a player to add a fixed number of chips to his/her stack in a tournament. Re-buys are allowed in the early stages of a tournament to keep players who are at or below their original chip count in the game.
- J. **Add-on** – an additional purchase of chips (optional) at the end of the re-buy period in a tournament.

10.3 Tournament Prizes

- A. The total prize pool figure shall be calculated and displayed after all buy-ins, any re-buys, and add-on period has ended shall be displayed to tournament participants.
- B. Promotional progressive pots and/or pools shall adhere to those standards set forth in Section 7, 8, and 9 of this document, as applicable and all other regulations regarding the accounting and administration thereof.

10.4 Submission Requirements

- A. Proposed tournament must be received at least thirty (30) days prior to the intended activation date. Minor revisions to a previously approved tournament must be received at least ten (10) business days prior to the proposed date of change and may be approved by the Director or his/her designee provided any such changes do not adversely affect or mislead the public due to prior advertisement. Late submission may be considered solely at the discretion of the CNGC.
- B. Tournament submissions shall contain the following minimum information:
 - 1. Tournament Name and/or description;
 - 2. Type (Standard, Promotional, or Special);

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3. Participants (i.e. players club members, seniors, men, women, and/or any combination which may or may not restrict participation);
4. Start date and time; for standard tournament the CNGC shall be notified in at least ten (10) business days in advance of tournament dates/times. Start dates and time should be provided for each event for multi-tiered tournaments;
5. Expected end date, buy-in, re-buys, add-ons, and tips/tokes, etc.;
6. Any wagering/game lay requirements (i.e. levels, blinds, antes, pot limits, and maximum/minimum credit bets, etc.);
7. Any participation restrictions/limits (i.e. one entry per customer, minimum/maximum number of entrants, etc.);
8. Any variation from the general game play rules and/or standard house rules regarding tournament play;
9. Prize(s) and/or prize structure and funding source; and,
10. Any other information related to the tournament required to ensure the integrity of the game.

10.5 Standard Card Tournaments

- A. The casino operation may offer standard card tournaments upon approval of a standard tournament format, rules and regulations, betting requirements, and prize structure.
- B. Upon approval of standard poker tournaments the operation shall provide the following information to the CNGC before offering the game to the public:
 1. Calendar of events, detailing the start dates/times and location of tournament games.
 2. Poker game(s) (i.e. Texas Hold'em, Omaha, Omaha Hi-Lo, 7-Card Stud, Dealer's Choice, etc.). The respective poker game rules shall apply and must be approved by the CNGC.
 3. Participation (i.e. minimum/maximum participants, Sit & Go, multi-table etc.).
 4. Any and all required fees, buy-ins, re-buys, add-ons, and free roll (minimum or no fees, etc.
 5. Levels and Blind structure, if different from original format.
 6. Betting requirements (i.e. Limit, No Limit, Pot Limit, etc.).

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C. Standard tournament rules and regulations shall apply and shall be posted at the tournament location and made available to the participant upon request.

10.6 Standard Table Tournaments

A. The casino operation may offer standard Table Game Tournaments upon approval of a standard tournament format, rules and regulations, and prize structure.

B. Upon approval of standard Table Game Tournaments the casino operation shall provide the following information to the CNGC before offering the game to the public:

1. Calendar of Events detailing the start dates and times of tournaments;
2. Participation limits/restrictions (i.e. minimum/maximum participant, sessions/rounds, number of tables, etc.);
3. Any and all required fees;
4. Any betting requirements; and,
5. Prize structure.

10.7 Electronic Gaming Machine Tournaments

A. The casino operation may offer electronic gaming machine tournaments upon approval by the

CNGC; the Director of the CNGC may provide approval, on a limited basis, to be affirmed by the CNGC, prior to advertisement and/or commencement of game play.

B. The casino operation shall provide the CNGC with tournament entry fees, format, rules and regulations, betting requirements, and prize structure.

C. Drop and Count procedures, including soft and hard meter readings shall be completed before and after any machines or devices used in tournament play.

D. A CNGC Agent must be present during the addition of any credits added to gaming machines and or devices for tournament play.

E. Progressive gaming machines or devices may not be used in tournament play unless the progressive is specific to the tournament.

F. All machines or devices set for tournament play must be cordoned off and excluded from public use until the conclusion of the tournament and all required procedures are completed.

SECTION 11
PARI-MUTUEL WAGERING

11.1 Exemptions

A. The requirements of this section shall not apply to casino operations who house pari-mutuel wagering operations conducted entirely by a state licensed simulcast service provider pursuant to an approved tribal-state compact if:

1. The simulcast service provider utilizes its own employees for all aspects of the pari-mutuel wagering operation;
2. The casino operation posts, in a location visible to the public, that the simulcast service provider and its employees are wholly responsible for the conduct of pari-mutuel wagering offered at that location;
3. The casino operation receives a predetermined fee from the simulcast service provider; and,

B. In addition, the Cherokee Nation Gaming Commission (CNGC), or the casino operation as approved by the CNGC, shall establish and the operation shall comply with standards that ensure that the operation receives, from the racetrack, its contractually guaranteed percentage of the handle.

C. Casino operations that contract directly with a state regulated racetrack as a simulcast service provider, but whose on-site pari-mutuel operations are conducted wholly or in part by tribal

operation employees, shall not be required to comply with paragraphs 11.8 (E) through 11.8 (I) of this section.

1. If any standard contained within this section conflicts with state law, a tribal-state compact, or a contract, then the casino operation shall document the basis for noncompliance and shall maintain such documentation for inspection by the CNGC.
2. In addition, the CNGC, or the casino operation as approved by the CNGC, shall establish and the operation shall comply with standards that ensure that the operation receives, from the racetrack, its contractually guaranteed percentage of the handle.

11.2 Computer Applications

For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section or any standard contained in a tribal-state compact, as approved by the CNGC, will be acceptable.

11.3 Betting Ticket and Equipment Standards

A. All pari-mutuel wagers shall be transacted through the pari-mutuel satellite system. In case of computer failure between the pari-

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mutuel book and the hub, no tickets shall be manually written.

- B. Whenever a betting station is opened for wagering or turned over to a new writer/cashier, the writer/cashier shall sign on and the computer shall document casino operation name (or identification number), station number, the writer/cashier identifier, and the date and time.
- C. A betting ticket shall consist of at least two (2) parts:
1. An original, which shall be transacted and issued through a printer and given to the customer; and
 2. A copy that shall be recorded concurrently with the generation of the original ticket either on paper or other storage media (e.g., tape or diskette).
- D. Upon accepting a wager, the betting ticket that is created shall contain the following:
1. A unique transaction identifier;
 2. Casino operation name (or identification number) and station number;
 3. Race track, race number, horse identification or event identification, as applicable;
 4. Type of bet(s), each bet amount, total number of bets, and total take; and,

5. Date and time.

- E. All tickets shall be considered final at post time.
- F. If a casino operation voids a betting ticket written prior to post time, it shall be immediately entered into the system.
- G. Future wagers shall be accepted and processed in the same manner as regular wagers.

11.4 Payout Standards

- A. Prior to making payment on a ticket, the writer/cashier shall input the ticket for verification and payment authorization.
- B. The computer shall be incapable of authorizing payment on a ticket that has been previously paid, a voided ticket, a losing ticket, or an unissued ticket.

11.5 Checkout Standards

- A. Whenever the betting station is closed or the writer/cashier is replaced, the writer/cashier shall sign off and the computer shall document the casino operation name (or identification number), station number, the writer/cashier identifier, the date and time, and cash balance.
- B. For each writer/cashier station a summary report shall be completed at the conclusion of each shift including:

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net funds transferred to or from the operation's bank account.

2. An exception report that contains a listing of all system functions and overrides not involved in the actual writing or cashing of tickets, including sign-on/off, voids, and manually input paid tickets; and,
3. A purged ticket report that contains a listing of the unique transaction identifier(s), description, ticket cost and value, and date purged.

11.8 Accounting and Auditing Functions

A casino operation shall perform the following accounting and auditing functions:

- A. The pari-mutuel audit shall be conducted by personnel independent of the pari-mutuel operation.
- B. Documentation shall be maintained evidencing the performance of all pari-mutuel accounting and auditing procedures.
- C. An accounting employee shall review handle, commission, and breakage for each day's play and recalculate the net amount due to or from the systems operator on a weekly basis.
- D. The accounting employee shall verify actual cash/cash equivalents turned in to the system's summary report for each cashier's drawer

(Beginning balance, (+) fills (draws), (+) net write (sold less voids), (-) payouts (net of IRS withholding), (-) cashbacks (pays), (=) cash turn-in).

- E. An accounting employee shall produce a gross revenue recap report to calculate gross revenue for each day's play and for a month-to-date basis, including the following totals:

1. Commission;
2. Positive breakage;
3. Negative breakage;
4. Track/event fees;
5. Track/event fee rebates; and,
6. Purged tickets.

- F. All winning tickets and vouchers shall be physically removed from the SAM's for each day's play.

- G. In the event a SAM does not balance for a day's play, the auditor shall perform the following procedures:

1. Foot the winning tickets and vouchers deposited and trace to the totals of SAM activity produced by the system;
2. Foot the listing of cashed vouchers and trace to the totals produced by the system;

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3. Review all exceptions for propriety of transactions and unusual occurrences;
 4. Review all voids for propriety;
 5. Verify the results as produced by the system to the results provided by an independent source;
 6. Regrade one-percent (1%) of paid (cashed) tickets to ensure accuracy and propriety; and,
 7. When applicable, reconcile the totals of future tickets written to the totals produced by the system for both earned and unearned take, and review the reports to ascertain that future wagers are properly included on the day of the event.
- H. At least annually, the auditor shall foot the wagers for one (1) day and trace to the total produced by the system.
- I. At least one (1) day per quarter, the auditor shall recalculate and verify the change in the unpaid winners to the total purged tickets.

SECTION 12
CASINO INSTRUMENTS AND EXCHANGES

12.1 Policy and Procedure Submissions

- A. The Cherokee Nation Gaming Commission (CNGC) or casino operation as approved by the CNGC, shall establish and the operation shall comply with procedures for control over the exchange of casino instruments, which shall include the standards in this section and those applicable standards in Section 4 – General Provisions.
- B. For purposes of this section, a casino instrument is any negotiable instrument introduced by the casino and used to conduct business transactions (e.g., currency, chips, tickets, coupons, vouchers, etc.).
- C. All casino instruments must be approved by the CNGC prior to use.

12.2 Manual Payouts for Gaming Machines

- A. For gaming machine jackpot and accumulated credit payouts, documentation shall include the following information:
 - 1. Date and time;
 - 2. Machine number;
 - 3. Dollar amount of manual payout (both alpha and numeric) or description of

personal property awarded, including fair market value. Alpha is optional if another unalterable method is used for evidencing the amount of the payout;

- 4. For jackpots, game outcome (including reel symbols, card values, suits, etc.);
 - 5. Game outcome is not required if a computerized system provides a sufficient means of recording jackpot prizes won;
 - 6. Preprinted or concurrently printed sequential number; and
 - 7. Signatures of at least two (2) employees verifying and witnessing the payout as specified in section 12.2(B).
- B. Manual payouts shall require specific authorization and signatures dependent upon the dollar value as follows:
 - 1. Two (2) signatures are required on all manual payouts. If an on-line accounting system is utilized, the signature of one (1) employee is sufficient if the payout is less than One Thousand Two Hundred Dollars (\$1,200.00).
 - 2. Manual payments of Five Hundred Dollars (\$500.00) or more requires a supervisory employee to verify the validity

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of the jackpot or accumulated credit payout prior to payment and verifying employee and the supervisor's signature on the payout form.

3. Manual payouts above the following thresholds (or a lower threshold, as authorized by management and approved by CNGC) must require the signature and verification of the employee verifying the jackpot or accumulated credit payout and a manager independent of the gaming machine department, on the payout form, prior to making the payment:
 - a. Five Thousand Dollars (\$5,000) for a Tier A facility;
 - b. Ten Thousand Dollars (\$10,000) for a Tier B facility;
 - c. Twenty Thousand Dollars (\$20,000) for a Tier C facility; or
 - d. Fifty Thousand Dollars (\$50,000) for a Tier C facility with over \$100,000,000 in gross gaming revenues.
4. All override payouts (i.e. a payout amount different from the amount generated by the gaming machine) must be

authorized by two (2) employees, at least one of whom must be a supervisor. Amounts greater than Five Thousand Dollars (\$5,000.00) must be authorized by a manager independent of the gaming machine department.

5. Payment authorization thresholds and authorization limits, not to exceed the limits established in 12.2(B)(2) and (B)(3) of this section, must be authorized by management by job title/position and approved by the CNGC, documented, and maintained.
6. Computerized systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one (1) person as required by Section 21 – Information Technology of this document.
 - C. Payout forms shall be controlled and routed in a manner that precludes any one (1) person from producing a fraudulent payout s by forging signatures or by altering the amount paid out subsequent to the payout and misappropriating the funds.

12.3 Gaming Machine Promotional Payouts or Awards

If a casino operation offers promotional payouts or awards that are not reflected on

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the gaming machine pay table, then the payout form/ documentation shall include:

- A. Date and time;
- B. Machine number and denomination;
- C. Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc.) including fair market value;
- D. Type of promotion (e.g., double jackpots, four-of-a-kind bonus, etc.);
- E. Signature(s) and employee number of the employee(s) verifying, authorizing, and completing the promotional payment with the customer.

12.4 Promotional Payouts, Drawings, and Giveaway Programs

At a minimum, promotional payouts resulting from a drawing, giveaway, and/or other approved marketing program must adhere to the following:

- A. Documentation shall include the following, prior to payment:
 - 1. Date and time;
 - 2. Dollar amount of payment or description of personal property (e.g. car);
 - 3. Reason for payment (e.g. name of promotion);

4. Customer's name (drawing only); and,

5. Signature(s) of the following number of employees verifying, authorizing, and completing the promotional payout with the customer:

- a. Two (2) employee signatures are required for all payments of One Hundred Dollars (\$100.00) or more; or
- b. For computerized systems that validate and print the dollar amount of the payment on a computer-generated form, only one (1) employee signature is required on the payment form.
- c. The required documentation may be prepared by an individual who is not a cage department employee as long as the required signatures are those of employees completing the payment with the customer.

B. [Reserved].

12.5 Cash Payout Limits

A. Tier C

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1. Cash payments for gaming machines payouts may be made in the amount of Twenty Thousand Dollars (\$20,000.00) or less. Payments exceeding Twenty Thousand Dollars (\$20,000.00) must be made in the form of a check and cash according to the customers request up to the Twenty Thousand Dollars (\$20,000.00) limit, while the remaining portion shall be satisfied by check only.
2. Cash payment for the redemption of chips may be made without limit. However, cash payments in excess of Ten Thousand Dollars (\$10,000.00) must be made in a secure location approved by the CNGC where the funds can be verified by the casino and the customer and the appropriate financial transaction reporting requirements must be satisfied prior to completing the transaction.
3. Chip redemptions in excess of Ten Thousand Dollars (\$10,000.00) must be verified by the pit, card room, cage/kiosk where the chips originated. The verification shall be documented and authorized by the appropriate management official.
4. If the origination of the chips being presented for redemption

cannot be verified, then the chips shall be carefully inspected for signs of counterfeiting and casino location. The transaction shall be concluded and payment shall be made only in accordance with paragraph 12.4 (A) of this Section if the inspection and attempts to determine the origination are inconclusive and the transaction is legitimate in all other aspects.

5. If the chips appear to be counterfeit or the origination is suspect, the transaction shall be suspended and the Cherokee Nation Marshall Service (CNMS) and the CNGC shall be notified immediately.
6. Surveillance and Security shall be notified of the transport of chips and/or cash to the secured location. Security shall escort the chips/cash until the transaction is completed and the funds have been transferred to the customer.

B. Tier B

1. Cash payments may be made in the amount of Five Thousand Dollars (\$5,000.00) or less for all payout transactions, including the redemption of chips.

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2. Financial transaction reporting requirements must be satisfied prior to completing the transaction.

C. Tier A and Small Operations

1. Cash payments may be made in the amount of Three Thousand Dollars (\$3,000.00) or less for all payout transactions, including the redemption of chips.
2. Financial transaction reporting requirements must be satisfied prior to completing the transaction.

12.6 Departmental Funds

All departmental funds shall be counted and verified independently by the assigned clerk and the cage cashier; the amounts shall then be reconciled to the recorded amounts at the end of each shift or session by Accounting/Revenue Audit, utilizing the appropriate accountability form and/or documentation. Unverified transfers of cash and/or cash equivalents are prohibited.

12.7 Cash-out Tickets

For purposes of this section, tickets shall be defined as those instruments generated by the gaming device and utilized by the casino to transact cash payments to the customer for jackpot payouts, accumulated credits, and/or other prizes and promotions earned through gaming activities. The following

standards shall apply only to Tier B and Tier C casino operations. Tier A operations must develop adequate standards governing the security over the issuance of the cash-out paper to the gaming machines and redemption of cash-out tickets that shall be submitted to the CNGC for review and approval.

Tier B and C Levels

- A. Gaming machine accounting and auditing procedure standards in Section 7 – Gaming Systems of this document shall apply.
- B. On a quarterly basis, the casino operation shall foot all IRS reportable jackpot cash-out tickets and trace the totals to those produced by the host validation computer system.
- C. The cash-out ticket printed at the gaming machine by an internal document printer shall be valid for a time period no less than fourteen (14) days and not to exceed thirty (30) days. The validation timeframe must be approved by CNGC.
- D. Cash out tickets may be redeemed for payment or inserted in another gaming machine and wagered if applicable during the specified time period. The appropriate time/date stamp shall be maintained by the gaming machine system and printed on the cash-out ticket.

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- E. The customer shall redeem the cash-out ticket at a cashier's station where it can be validated. Alternatively, if a casino operation utilizes a remote computer validation/redemption system (e.g. electronic kiosk), the CNGC, or the operation as approved by the CNGC shall develop alternate standards for the maximum amount that can be redeemed, which shall not exceed \$2,999.99 per cash-out transaction.
- F. Upon presentation of the cash-out ticket(s) for redemption, the following shall occur:
1. Scan the bar code via an optical reader or its equivalent; or,
 2. Input the cash-out ticket validation number into the computer.
- G. The information in paragraph F of this section shall be communicated to the host computer. The host computer shall verify the authenticity of the cash-out ticket and communicate directly to the cashier (redeemer) of the cash-out ticket.
- H. If valid, the cashier (redeemer) pays the customer the appropriate amount and the cash-out ticket is electronically noted "paid" in the system. The "paid" cash-out ticket shall remain in the cashier's bank for reconciliation purposes. The host validation computer system shall electronically reconcile the cashier's banks for the paid cashed-out tickets.
- I. If invalid, the host computers shall notify the cashier (redeemer). The cashier (redeemer) shall refuse payment to the customer and notify a supervisor of the invalid condition. The supervisor shall resolve the dispute. All documentation shall be held for investigation.
- J. Payment of a claim must follow the procedures as outlined in part 12.12 of this section.
- K. If the host validation computer system temporarily goes down, cashiers may redeem cash-out tickets at a cashier's station after recording the following:
1. Serial number of the cash-out ticket;
 2. Date and Time;
 3. Dollar amount;
 4. Issuing gaming machine number;
 5. Marking ticket "paid";
 6. Ticket shall remain in cashier's bank for reconciliation purposes; and,
 7. The ticket shall have the signature (the full name of the

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employee and/or initials), and the employee number of the cashier.

- L. Cash-out tickets shall be validated as expeditiously as possible when the host validation computer system is restored. All cash-out tickets must be validated and recorded by the computer system.
- M. Unredeemed tickets can only be voided in the validation or casino management system by supervisory employees. The accounting department will maintain the voided ticket, if available.
- N. The CNGC or the casino operations as approved by the CNGC shall establish and comply with procedures to control cash-out ticket paper, which shall include procedures that:
 - 1. Mitigate the risk of counterfeiting of cash-out ticket paper;
 - 2. Adequately control the inventory of the cash-out ticket paper;
 - 3. Provide for the destruction of all unused cash-out ticket paper; and,
 - 4. If the casino operation utilizes a functioning, lab certified computer validation system

then this standard shall not apply.

- O. If the host validation computer system is down for more than four (4) hours, the casino operation shall promptly notify the CNGC.
- P. These gaming machine systems shall comply with all other standards (as applicable) in this document.

12.8 Ticket Requirements

- A. Tickets generated at a gaming device shall be posted as an expense upon generation of the ticket.
- B. Tickets shall be accounted for by individual machine.
- C. Tickets shall be active for a period not less than fourteen (14) days and not to exceed thirty (30) days as approved by the CNGC.
- D. Tickets shall be considered Cash Equivalents and shall be treated as such during reconciliation.
- E. The following information shall be printed upon the face of each ticket generated:
 - 1. The validation system must assign a unique and sequential ticket Serial Number (Validation Number) to all tickets. The Ticket Serial

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- Number shall be printed upon the ticket for manual verification purposes.
2. The ticket serial number shall be a minimum of eighteen (18) digits in length.
 3. The numerical ticket series may not be repeated during the business year.
 4. The ticket serial number shall be printed upon the ticket in bar-code form.
 5. The ticket validation number may be included with the bar-code of the ticket.
- F. The full name and physical address of the gaming facility shall be printed upon the face of the ticket.
- G. The ticket shall be time/date stamped based upon the date and time the ticket was generated from the gaming device.
- H. The cash value of the ticket in both dollars and cents shall be printed upon the face of the ticket in numeric form.
- I. The cash value of the ticket shall be printed upon the face of the ticket in alpha-numeric form.
- J. The ticket shall include the point of origin or the asset number of the gaming device which generated the ticket.

- K. Delayed Tickets are prohibited. Tickets must be printed immediately upon executing the appropriate command.
- L. Duplicate tickets must clearly state that the ticket is a duplicate upon the face of the ticket. Duplicate tickets may only be printed and redeemed with management's specific authorization, in writing by signature and employee number on the face of the payout form.
- M. Procedures for Promotional tickets shall be approved by the CNGC and adhere to the requirements stated in, Section 16 - Marketing Programs of this document.

12.9 Patron accounts and cashless systems

- A. All smart cards (i.e., cards that possess the means to electronically store or retrieve data) that maintain the only source of account data are prohibited.
- B. For each patron deposit accounts the following standards must apply:
1. Require the patron to personally appear at a designated area of accountability, and present valid government issued picture identification;

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2. Examine and record the following:
 - a. Type of identification credential examined;
 - b. The credential number;
 - c. The expiration date of credential; and,
 3. Record the patron's name and may include another identifier (e.g., nickname, title, etc.) of the patron, if requested by patron;
 4. Record a unique identity for each patron deposit account;
 5. Record the date the account was opened; and,
 6. The cashier's name;
 7. The patron must sign the account documentation before the cashier may activate the account.
 8. Provide the account holder with a secure method of access to the account.
- C. Patron deposit accounts must be established for patrons at designated areas of accountability and the creation of the account must meet all the controls of paragraph (B) of this section when the patron makes an initial deposit of cash or cash equivalents.
- D. If patron deposit account adjustments may be made by the operation, the operation must be authorized by the account holder to make necessary adjustments. This requirement can be met through the collection of a single authorization that covers the life of the patron deposit account.
 - E. Patron deposit and withdrawals:
 1. Prior to the patron making a deposit or withdrawal from a patron deposit account, the cashier or cashless system must verify the patron deposit account, identity of the patron and availability of funds. Reliance on a secured Personal Identification Number (PIN) entered by the patron is an acceptable method of verifying patron identity.
 2. A multi-part deposit/withdrawal record must be created when the transaction is processed by a cashier, including;
 3. Same document number on all copies;
 4. Type of transaction, deposit or withdrawal;
 5. Name of other identifier of the patron;
 6. The unique account identifier;

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7. Patron signature for withdrawals, unless a secured PIN is utilized by the patron;
8. Date and time of transaction;
9. Dollar amount of transaction;
10. Nature of deposit or withdrawal (e.g., cash, check, chips); and,
11. Signature of the cashier processing the transaction.
12. When a patron deposits or withdraws funds from a patron deposit account electronically, the following must be recorded:
 - a. Date and time of transaction;
 - b. Location (player interface, kiosk);
 - c. Type of transaction (deposit, withdrawal);
 - d. Amount of transaction; and,
 - e. The unique account identifier.
13. A copy of the transaction record must be secured for reconciliation of the cashier's bank for each shift. All transactions involving patron deposit accounts must be accurately tracked.

14. The copy of the transaction record must be forwarded to the accounting department at the end of the gaming day.
 15. When a cashier is not involved in the deposit/withdrawal of funds, procedures must be established that safeguard the integrity of the process used.
- F. Patron Deposit Account Adjustments:
1. Adjustments to the patron deposit accounts must be performed by an employee.
 2. A record must be created when the transaction is processed, including:
 - a. Unique transaction identifier;
 - b. Type of transaction, adjustment;
 - c. Name or other identifier of the patron;
 - d. The unique account identifier;
 - e. Date and time of transaction;
 - f. Dollar amount of transaction;
 - g. Nature of adjustment;

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- h. Reason for the adjustment; and,
 - i. Signature or unique identifier for the employee who made the adjustment.
 - 3. The transaction record must be forwarded to the accounting department at the end of the gaming day.
- G. Where available, systems reports that indicate the dollar amount of transactions for patron deposit accounts (e.g., deposits, withdrawals, account adjustments, etc.) that should be reflected in each cashier's accountability must be utilized at the conclusion of each shift in the reconciling of funds.
- H. Cashless transactions and electronic funds transfers to and from patron deposit accounts must be recorded and maintained at the end of the casino operation's specified twenty-four (24) hour accounting period.
- I. Procedures must be established to maintain a detailed record for each patron deposit account that includes the dollar amount of all funds deposited and withdrawn, account adjustments made, and the transfers to or from player interfaces.
- J. Detailed patron deposit account transaction records must be available to the patron upon reasonable request and to CNGC upon request.
- K. Only dedicated casino operation bank accounts must be used to record electronic funds transfers to or from the patron deposit accounts. Casino operation bank accounts dedicated to electronic funds transfers to or from the patron deposit accounts must not be used for any other types of transactions.
- L. For promotional and other accounts the following standards must apply:
 - 1. Changes to promotional and other accounts must be performed by an employee.
 - 2. The following standards apply if a player tracking system is utilized:
 - a. In the absence of the patron, modifications to balances on a promotional or other account must be made under the authorization of supervisory employees and must be sufficiently documented (including substantiation of reasons for modification). Modifications are randomly verified by independent employees on a quarterly basis. This standard does

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not apply to the deletion of balances related to inactive or closed accounts through an automated process.

b. Access to inactive or closed accounts is restricted to supervisory employees.

c. Patron identification is required when redeeming values.

3. Reliance on a secured PIN by the patron is an acceptable method of verifying patron identification.

12.10 Account Access Cards

For gaming machines that utilize account access cards to activate the play of the machine, the following standards shall apply:

A. Equipment

1. A central computer, with supporting hardware and software, to coordinate network activities, provide system interface, and store and manage a play/account database.

2. A network of contiguous player terminals with touch-screen or button controlled video monitors connected to an electronic selection device and the central computer via a communications network.

3. One or more electronic selection devices, utilizing random number generators, each of which selects any combination or combinations of numbers, colors, and/or symbols for a network of player terminals.

B. Player terminal standards

1. The player terminal standards are connected to a game server.

2. The game server shall generate and transmit to the bank of player terminals a set random numbers, colors, and/or symbols at regular intervals. The subsequent game results are determined at the player terminal and the resulting information is transmitted to the account server.

3. The game server shall be housed in a game server room or a secured locked cabinet.

C. Customer account maintenance standards

1. A central computer acting as an account server shall provide customer account maintenance and the deposit/withdrawal function of those account balances.

2. Customers may access their accounts on the computer system by means of an account

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access card at the player terminal. Each player terminal may be equipped with a card reader and PIN pad or touch screen array for this purpose.

3. All communications between the player terminal, or bank of player terminals, and the account server shall be encrypted for security reasons.

D. Customer account generation standards

1. A computer file for each customer shall be prepared by a clerk, with no incompatible functions, prior to the customer being issued an account access card to be utilized for machine play. The customer shall select his/her PIN to be used in conjunction with the account access card.
2. For each customer file, an employee shall:
 - a. Record the customer's name and current address;
 - b. The date the account was opened; and,
 - c. At the time the initial deposit is made, account opened, or credit extended, the identity of the customer shall be verified by examination of a valid

driver's license or other reliable identity credential.

3. The clerk shall sign-on with a unique password to a terminal equipped with peripherals required to establish a customer account. Passwords are issued and can only be changed by information technology personnel in accordance with Section 21 – Information Technology.

4. After entering three (3) incorrect PIN entries at the cage or player terminal, the customer shall be directed to proceed to the appropriate station to obtain a new PIN. If the customer forgets, misplaces or requests a change to their PIN, the same procedures shall apply.

5. Generic or house cards are prohibited, unless approved by the CNGC.

E. Deposit of credits standards

1. The cashier shall sign-on with a unique password to a cashier terminal equipped with peripherals required to complete the credit transactions(s). Passwords are issued and can only be changed by information technology personnel in accordance with Section 15 Key and Access Controls.

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2. The customer shall present cash, chips, coin, or cash equivalents (as approved), or coupons along with their account access card to a cashier to deposit credits.
3. The cashier shall complete the transaction by entering an account number or utilizing a card scanner that the cashier shall slide the customer's account access card through.
4. The cashier shall accept the funds from the customer and enter the appropriate amount on the cashier terminal.
5. A multi-part deposit slip shall be generated by the point-of-sale receipt printer with the following steps:
 - a. The cashier shall direct the customer to sign the deposit slip receipt,
 - b. One copy of the deposit slip shall be given to the customer, and
 - c. The other copy of the deposit slip shall be secured in the cashier's cash drawer.
6. The cashier shall verify the customer's balance before completing the transaction. The cashier shall secure the funds in their cash drawer and

return the account access card to the customer.

7. Alternatively, if a kiosk is utilized to accept a deposit of credits, the CNGC or the casino operation as approved by the CNGC shall establish and comply with procedures that safeguard the integrity of the kiosk system.

F. Prize standards

1. Winners at the gaming machines may receive cash, prizes redeemable for cash or merchandise.
2. If merchandise prizes are to be awarded, the specific type of prize or prizes that may be won shall be disclosed to the player before the game begins.
3. The redemption period of account access cards, as approved by the CNGC, shall be conspicuously posted in the casino operation.

G. Credit withdrawal

The customer shall present their account access card or ticket to the cashier to withdraw their credits. The cashier shall perform the following:

1. Scan the account access card;
2. Request the customer to enter their PIN;

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3. The cashier shall ascertain the amount the customer wishes to withdraw and enter the amount into the computer;
4. A multi-part withdrawal slip shall be generated by the point-of-sale receipt printer. The cashier shall direct the customer to sign the withdrawal slip; and,
5. The cashier shall verify that the account access card and the customer match by:
 - a. Comparing the customer to image on the computer screen;
 - b. Comparing the customer to image on the customer's picture identification; or
 - c. Comparing the customer signature on the withdrawal slip to signature on the computer screen.
6. The cashier shall verify the customer's balance before completing the transaction. The cashier shall pay the customer the appropriate amount, issue the customer the original withdrawal slip, and return the account access card to the customer.
7. The copy of the withdrawal slip shall be placed in the cash drawer. All account

transactions shall be accurately tracked by the account server computer system. The copy of the withdrawal slip shall be forwarded to the accounting department at the end of the gaming day.

8. In the event the imaging function is temporarily disabled, customers shall be required to provide positive identification for cash withdrawal transactions at the cashier stations.

12.11 Smart Cards

All smart cards (i.e., cards that possess the means to electronically store and retrieve data) that maintain the only source of account data are prohibited.

12.12 Claims and Refunds

- A. All claims/refunds must be documented on a three-part form, in a continuous numerical series, pre-numbered and concurrently numbered in a format issued in only one series at a time.
- B. Unissued and issued forms shall be safeguarded and adequate procedures shall be employed in the distribution, use, and control of the same.
- C. Unissued forms shall be kept in cage accountability upon receipt.

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- D. In order to initiate a claim, the customer must present valid identification.
- E. The original part shall be maintained in continuous sequence, with original signatures, by a designated custodial department and made available upon request to the CNGC.
- F. One (1) part shall be retained by the cashier, who shall sign the form acknowledging that they have reviewed it for appropriate authorization, prior to paying the approved claim.
- G. If the claim is denied, the form should not be submitted to a cashier, but shall be filed with the original.
- H. One (1) part shall be offered to the customer for their records, regardless as to whether the claim is approved or denied.
- I. Approved claims may not be paid and/or removed from cage accountability until such time as the patron is presented payment and acknowledges receipt by signature, not to exceed thirty (30) days from date claim is approved.
- J. When a claim form is voided, the employee shall clearly mark "VOID" across the face of the document, initial/date and maintain all copies with the original documentation.
- K. Each form shall include at least the following information:
1. Game date;
 2. Machine or Table number;
 3. Location;
 4. Time;
 5. Transaction number (if applicable);
 6. Amount of Claim;
 7. Customer Name and Address;
 8. Description of Claim;
 9. Investigation Results; and,
 10. Approved/Denied.
- L. Failure to complete a claim form in its entirety shall constitute a violation of these standards. If a required field is not applicable to the claim, place an N/A in the space provided.
- M. Document the payment of a claim of a cash-out ticket that is not physically available or a cash-out ticket that cannot be validated such as a mutilated, expired, lost, or stolen cash-out ticket.
- N. At least two (2) employees must sign the claim form documentation indicating that they have reviewed the claim and have documented the

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results, indicating whether the claim is approved or denied.

- O. Claims greater than One Thousand Dollars (\$1,000.00) shall require authorization by a management official, in addition to the requirement in paragraph N.
- P. On at least a quarterly basis, accounting shall review original claim forms for reasonableness and compare to those forms redeemed by the cashiers.

12.13 Chip Redemptions

- A. All chip transactions must be broken down for proof prior to exchange for cash, within the designated payout area as follows:
 - 1. \$1.00 Chips 4 Stacks–5 High
 - 2. \$5.00 Chips 4 Stacks–5 High
 - 3. \$25.00 Chips 5 Stacks–4 High
 - 4. \$100.00 Chips 4 Stacks–5 High
 - 5. \$500.00 Chips 5 Stacks–4 High
 - 6. \$1000.00 Chips 4 Stacks–5 High
- B. Each denomination must be sized together and the final stack splashed within the designated payout area. The final tally of the total amount of chips presented for

payment shall be communicated to the customer.

- C. For large payouts the chips may be placed back into the rack as each denomination has been proven.
- D. The employee will then pay the customer in accordance with Currency Handling procedures, one (1) bill over the other.
- E. Once the customer has received the cash the chips may be removed from the designated payout area and placed in the cashier's bank.
- F. Chips shall be separated from cash funds when transferring to the Cage or Main Vault.

12.14 Procedures for Redemption of Coupons / Vouchers / Similar Items

The CNGC or the casino operation, as approved by the CNGC shall establish and comply with procedures that account for and control coupons/vouchers/similar items, whether electronic or manual, which shall include:

- A. Redemptions shall only occur at a location or a device where the coupon can be properly validated and transacted.
- B. Coupons shall be redeemed by the patrons of the operation in accordance with the manner prescribed and approved, inclusive

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- of effective dates and purchase requirements.
- C. Where applicable, the patron of the operation shall present a valid form of photo identification and/or a Players Club membership card to the cashier at the time of redemption.
- D. Coupons/electronic redemptions must be associated with a transaction. No even exchanges for cash or cash equivalents are allowed without a proper audit trail.
- E. Management may authorize exceptions on a limited basis and shall evidence authorization by signature and employee number.
- F. Employees of the casino operation who conduct the redemptions shall be held accountable of ensuring that only valid promotions are redeemed by patrons of the operation.
- G. Person(s) responsible for the redemptions shall be precluded from having the authority to set up or adjust electronic promotions or access to issue/distribute (have possession of) coupons or similar items.
- H. All restrictions and/or limitations shall be properly controlled and enforced.
- I. Printed coupons shall be redeemed in the following manner:
1. Cashier shall immediately write or stamp the word "VOID" across the face of the coupon and sign their name and employee number on the coupon to prevent possible duplicate redemption.
 2. Alternatively, where a coupon validation system is utilized a cashier may scan/validate a coupon in lieu of a manual void, provided the validation system effectively prevents the coupon from being used more than one time.
 3. Cashier shall process the coupon in accordance with the manner and values prescribed upon the coupon and attach the coupon to a duplicate receipt. Alternatively, if the computer (POS) system provides for adequate tracking the cashier may write the transaction number on the coupon.
 4. The redeemed coupon shall be maintained by the cashier as a cash equivalent for the purpose of balancing the cash drawer and/or bank.
 5. On a daily basis, the main cage shall forward all redeemed coupons to Accounting for reconciliation.

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- J. Electronic redemptions are permissible, provided they provide the same level of control as required by the standards in this Section, as approved by the CNGC.

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14.1 Casino Credit – Checks, Credit/Debit Transactions

- A. As approved by the Cherokee Nation Gaming Commission (CNGC), the operation shall establish and comply with procedures for the acceptance of credit instruments including checks and credit/debit transactions with appropriate controls for purposes of security and integrity and in accordance with CNGC Rules & Regulations (R&Rs). The operation shall further establish a policy for promoting responsible gaming in regards to the acceptance of credit instruments.
- B. Personal checks may be accepted into Cage accountability provided they are warranted by and in accordance with procedures established by a national check clearing firm. The CNGC must approve all related procedures and agreements prior to implementation.
- C. Cashier's checks, traveler's checks, money orders, and/or other guaranteed drafts or major credit and/or bank debit cards may be accepted into Cage accountability only with proper identification and in accordance with the Bank/Issuer or Credit Service requirements. Automated Teller Machines (ATMs) and Cash Access devices are exempt from this standard. The CNGC must approve all related procedures and agreements, and

any amendments to such agreements.

- D. The CNGC must approve all procedures and agreements, as well as any amendments to such agreements, related to ATMs and Cash Access devices. Such devices are considered secured/controlled equipment and are subject to other control standards, as applicable, in this document (e.g. Key and Access Control, Information Technology, Surveillance, etc.).
- E. In the case of government, payroll, and/or business checks, which are not warranted, the operation, as approved by the CNGC, shall establish and shall comply with procedures which shall include the criteria used to evaluate the credit reputation or financial resources to determine that there is a reasonable basis for extending the credit in the amount or sum placed at the customer's disposal.
- F. The CNGC shall approve all procedures, and any subsequent changes made thereto, related to the buying back of checks issued by a gaming facility.
- G. Procedures for the acceptance of allowable credit instruments (checks, and credit/debit transactions) shall include, at a minimum, the following:
 - 1. Examination of the instrument;

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2. Customer identification requirements;
 3. Documentation requirements;
 4. Guarantor/Bank/Issuer authorization (as applicable);
 5. Employee authorization and limits; and,
 6. Signature attestation requirements.
- H. If checks are cashed at the cage, the controls must provide for security and integrity. For each check cashing transaction, the employee(s) conducting the transaction must:
1. Verify the customer's identity;
 2. Examine the check to ensure it includes the customer's name, current address, and signature;
 3. For personal checks, verify the patron's check cashing authority and record the source and results in accordance with management policy; however,
 4. If a check guarantee service is used to guarantee the transaction and the procedures required by the check guarantee service are followed, then the above requirements do not apply.

- I. When counter checks are issued, the following must be included on the check:
 1. The customer's name and signature;
 2. The dollar amount of the counter check;
 3. Customer's bank name, bank routing and account numbers;
 4. Date of issuance; and,
 5. Signature of the employee approving the counter check transaction.
- J. Checks are not allowed to be held.

14.2 Cage and Vault Accountability Standards

- A. All transactions that flow through the cage shall be summarized on a cage accountability form for each shift and shall be supported by documentation.
- B. Increases and decreases to the total casino cage inventory or reserve shall be supported by documentation. Documentation shall include the date and shift, the purpose of the increase/decrease, the name, identification number, and signature of the person(s) completing the transaction, and the name, identification number, and signature of the person or

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department receiving the cage funds (for decreases only).

C. The cage and vault inventories shall be counted by the oncoming and outgoing cashiers who shall make individual counts for comparison of accuracy and maintenance of individual accountability. Such counts shall be recorded in ink or other permanent form at the end of each shift during which the activity took place. All discrepancies shall be noted and investigated. Unverified transfers of cash and/or cash equivalents are prohibited.

D. Bulk counts of strapped/bundled currency may be accepted from the Soft Count into the Cage/Vault and between Vault shifts provided:

1. Bundled/strapped currency received is traceable to the origin (e.g. Soft Count), identification number, employee initials, and date recorded on each strap of the last person who verified the currency;
2. Cage/Vault procedures provide for a rotation and audit of bundled/strapped currency received within a twenty-four (24) hour period after acceptance into Cage accountability; and,
3. All loose currency must be verified in accordance with standards in paragraph C.

E. The CNGC, or the casino operation as approved by the CNGC, shall establish and the operation shall comply with a minimum bankroll formula to ensure the operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the operation's customers as they are incurred. A suggested bankroll formula will be provided by the CNGC upon request.

14.3 Kiosks

- A. Kiosks must be maintained on the cage accountability and must be counted independently by at least two employees, documented, and reconciled for each increase or decrease to the kiosk inventory.
- B. Currency cassettes must be counted and filled by an employee and verified independently by at least one employee, all of whom must sign each cassette.
- C. After completing the fill and prior to the first transaction, the employee must test the machine to verify that currency cassettes contain the correct denominations and have been properly installed.
- D. Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed inside a kiosk, must be stored in a secured area of the cage/vault.

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- E. The CNGC or the casino operation, subject to the approval of the CNGC, must develop and implement physical security controls over the kiosks. Controls should address the following: forced entry, evidence of any entry, and protection of circuit boards containing programs.
- F. With regard to cashless systems, the CNGC or the casino operation, subject to the approval of the CNGC must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.
- G. 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 the system limitation(s) must be noted):
1. Starting balance dollar amount per financial instrument;
 2. Starting balance number of items per financial instrument;
 3. Dollar amount per financial instrument issued;
 4. Number of items per financial instrument issued;
 5. Dollar amount per financial instrument redeemed;

6. Number of items per financial instrument redeemed;
7. Dollar amount per financial instrument increases;
8. Number of items per financial instrument increases;
9. Dollar amount per financial instrument decreases;
10. Number of items per financial instrument decreases;
11. Ending balance dollar amount per financial instrument; and,
12. Ending balance number of items per financial instrument.

14.4 Customer Deposited Funds

If a casino operation permits a customer to deposit funds for safekeeping or front money purposes with the operation at the Cage, the following standards shall apply:

- A. A file for the customer shall be prepared prior to acceptance of a deposit.
- B. The CNGC, or the casino operation as approved by the CNGC, shall establish and the operation shall comply with procedures that verify the customer's identity, by examination of photo identification.
- C. Only cash and approved cash equivalents/casino instruments

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shall be accepted from customers for the purpose of a customer deposit.

- D. All customer deposits and withdrawal transactions at the point of transaction shall be recorded on a cage accountability form on a per-shift basis.
- E. The receipt or withdrawal of a customer deposit shall be evidenced by a numerically controlled, completed two (2) part document with one (1) copy given to the customer and one (1) copy remaining in the paperwork at the area of withdrawal.
- F. Each of the two (2) parts of the sequentially-numbered receipt shall contain the following information:
 - 1. Same sequentially-numbered receipt number on each copy;
 - 2. Customer's name and signature;
 - 3. Date of receipt and/or withdrawal;
 - 4. Dollar amount of deposit/withdrawal;
 - 5. Nature of deposit/withdrawal (cash, check, chips); and
 - 6. The name, identification number, and signature of the employee who conducted the transaction.

G. The operation, as approved by the CNGC, shall establish and comply with procedures that;

- 1. Maintain a detailed record by customer name and date of all funds on deposit and withdrawals;
- 2. Maintain a current balance of all customer cash deposits that are in the Cage/Vault inventory or accountability; and
- 3. Reconcile this current balance with the deposits and withdrawals at least daily.

H. The operation, as approved by the CNGC, shall describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form ensuring that the form is signed by the cashier.

14.5 Safe Deposit Boxes

- A. The operation shall establish and comply with procedures, as approved by the CNGC, for the utilization of safe deposit boxes, wherein the operation maintains custody.
- B. Access to safe deposit boxes shall be controlled with at least two (2) keys. One controlled by the operation and one issued to the customer, which shall be unique to each box.

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- C. The customer must sign a log each time they access their respective safe deposit box, which shall include a date/time stamp and the employee who provided access on behalf of the operation.

- D. The issuance and closure of a customer's safe deposit box in the cage shall be evidenced by a document that includes the following information:
 - 1. Safe deposit box number;
 - 2. Date of issuance and closure;
 - 3. Customer's name and signature;
 - 4. Verification of the customer's identity by examination of an identification credential (e.g. driver's license) or other method to ensure the customer's identity. The identification credential information shall be documented; and
 - 5. The name, identification number and signature of the employee who issued or closed the safe deposit box.

- E. The operation shall establish and comply with procedures to maintain a detailed record of all Cage/Vault safe deposit boxes and the current status of each box (e.g. issued, not issued, inactive).

- F. These standards shall apply to all safe deposit boxes, wherein the operation has guardianship (including non-gaming areas).

14.6 Chip Standards

The CNGC, or the casino operation as approved by the CNGC, shall establish and the operation shall comply with procedures for the purchase, receipt, inventory, storage, and destruction of gaming chips.

14.7 Accounting/Auditing Standards

The operation shall comply with the following standards:

- A. The cage shall be counted by Revenue Audit and reconciled to the general ledger at least monthly.

- B. The casino operations shall comply with the following for all cage accounting procedures:
 - 1. Document all procedures and any follow-up procedures;
 - 2. Maintain documentation for inspection; and,
 - 3. Provide all documentation to CNGC for approval.

14.8 Extraneous Items

- A. The CNGC, or the casino operation as approved by the CNGC, shall establish and the casino operation

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shall comply with procedures to address the transporting of extraneous items, into and out of the cage and/or vault. Items for medical purposes (e.g. throat lozenges, cough drops, or hard candy) are acceptable.

B. Employees working within the cage area(s) are strictly prohibited from having any personal items with them, except as provided for in paragraph 14.8 (A). This shall include but not be limited to the following items:

1. Purses, backpacks, outerwear, etc.;
2. Personal funds;
3. Personal toiletries (e.g. hand lotion, make-up, hair brush, mirrors, cigarettes, etc.); and,
4. Personal electronics and/or equipment (e.g. cellular phones and/or other communications devices, music player, camera, etc.).

C. Food and drinks are prohibited within the cage area(s). This shall not prohibit the utilization of a water cooler in this area or other clear liquids provided they are in a clear container secured with a clear lid.

D. Secured areas shall be kept free of clutter and all items located within these areas shall be stored in a manner that does not obstruct the

view of Surveillance (e.g. clear or translucent boxes, bins and/or bags). Non-essential items within secured areas are prohibited.

E. Trash cans and trash bags shall be clear or mesh so as not to obstruct the view of Surveillance.

14.9 Cage Cashier Access

A. This area is highly restricted, and only those individuals with sufficient security clearance shall be permitted entry to this area.

B. Employees of the casino operation not specifically allowed access by title, shall sign an access log upon entering and exiting the area, and shall be accompanied by personnel who are specifically allowed access to this area.

C. Persons authorized to enter the Cage/Vault area without escort shall be listed by title with a corresponding level of access. The operation is responsible to update the list and provide the list to the CNGC every thirty (30) days. At a minimum, the monthly report shall include the title of authorized persons, any changes made, and/or a statement indicating no changes were made from the previous report submitted to the CNGC.

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14.10 Other Standards

The standards in Section 4 – General Provisions, Section 12 – Casino Instruments and Exchanges, Section 16 – Marketing Programs, and Section 19 – Financial Transaction Reporting shall also apply to Section 14.

SECTION 15
KEY AND ACCESS CONTROLS

15.1 Definitions

A. The definitions in this section shall apply to all sections of the part unless otherwise noted.

B. Definitions:

Access Badge / Card – a credential used to gain entry to an area having automated access control entry points.

Custody – directing and/or overseeing the use of a key and/or access badge/card.

Entry Access – is the ability to physically enter an area within a facility and classified as Highly Restricted, Restricted, or Unrestricted.

Entry Access – Highly Restricted – areas include but are not limited to:

1. Areas that contain equipment or control the HVAC systems or water supplies;
2. Areas that contain equipment or control the Safety and Security Systems;
3. Cage;
4. Chip Cage;
5. Chip Vault;

6. IT related areas, including areas where storage server racks are located;

7. Liquor storage;

8. Man Traps;

9. Soft Count;

10. Surveillance; and,

11. Vault.

Entry Access – Restricted – areas include but are not limited to:

1. Back of House (area where employees and/or vendors have access and the public does not);
2. Players Club;
3. Point of Sale (POS) / cash drawers; and,
4. Warehouse/Storage areas (sensitive materials require locked cages with logs and camera coverage).

Entry Access – Unrestricted – areas are considered public access areas that do not require the use of a key or access badge/card to gain entry.

Keys – a metal instrument that when inserted into a lock and turned, operates the lock's mechanism. All keys within a facility shall be categorized as

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Sensitive and Non-Sensitive with justification.

Keys / Locks / Access – Sensitive
– the following keys/locks/access shall be considered to be Sensitive and controlled in nature and shall include but not limited to:

1. Drop and Count:
 - a. Soft count room; and,
 - b. Transport cart.
2. Electronic Gaming Systems:
 - a. Bill acceptor canister contents keys;
 - b. Bill acceptor canister release keys;
 - c. Logic board / door keys;
 - d. Machine data access/reset keys; and,
 - e. Machine door keys.
3. Table Games:
 - a. Card room keys;
 - b. Chip tray lid keys;
 - c. Drop box contents keys;
 - d. Drop box release keys; and,
 - e. Pit storage cabinet keys.

4. Other:
 - a. Accounting box;
 - b. Electronic Kiosks / Automated Teller Machines (ATM);
 - c. IT Server/computer Rooms;
 - d. Gaming related storage server racks;
 - e. Key storage boxes / areas;
 - f. Promotional devices (e.g. hoppers);
 - g. Stationary and mobile POS/cash drawers;
 - h. Surveillance; and,
 - i. Vault / main cage.
5. Any keys not listed must be evaluated / categorized as approved by CNGC.

Lock – a fastening mechanism used to secure an area, door, etc. operated/opened by a key and/or an access badge/card

Possession – maintaining and exercising physical control of a key and/or access badge/card.

SECTION 15
KEY AND ACCESS CONTROLS

15.2 General Standards

- A. Tier A casino operations shall be exempt from compliance with this section if the Cherokee Nation Gaming Commission (CNGC), or the operation as approved by the CNGC, establishes and the operation complies with procedures that maintain adequate key control and restricts access to sensitive areas.
- B. Tier B and C casino operations shall establish policies and procedures, subject to CNGC approval, that provide for proper key and access controls that meet the standards in this section.
- C. Key Controls shall provide for adequate segregation of duties and provide for adequate security of tribal assets.
- D. At no time shall any sensitive keys leave the gaming facility without the express written consent of the CNGC.
- E. Employees of the casino operation in custody of sensitive keys shall at no time have these keys leave their custody without the utilization of a key log documenting the chain of custody for the sensitive keys in question.
- F. For sensitive keys locking mechanisms shall be unique for each type of key and property exclusive (e.g. locking

mechanisms for bill acceptor canister release shall be exclusive to that purpose).

- G. Master keys for each property's sensitive keys / restricted areas shall be prohibited unless otherwise approved by the CNGC.

15.3 Key Inventory

- A. Inventory records shall be complete and shall indicate date keys are received into inventory and as applicable the date of removal or destruction as applicable.
- B. An inventory of all sensitive keys shall be maintained by the Security department and submitted to the CNGC, on a centralized standard form utilized by each property and approved by CNGC, which shall include the following:
 - 1. Assigned number (a separate number shall be assigned to each key);
 - 2. Description (imprinted key number and designation and purpose);
 - 3. Location;
 - 4. Custodial department;
 - 5. Key Category (Sensitive and Non-Sensitive); and,

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6. Key Totals for each category.

- C. All duplicate keys shall be maintained in a manner that provides the same degree of control as the original. Duplicates shall not be made without prior written approval from management and the CNGC. Records shall be maintained for each key duplicated that indicate the number of keys made and destroyed.
- D. For the purchase/replacement of sensitive locks and/or keys, the purchase request must specify the need and be authorized by the operations management and Security supervisor with notice given to the CNGC.
- E. For on-site installation and repair, Security must accompany the vendor and Surveillance shall be notified.
- F. For off-site installation and repair, all locked items shall be inspected by an independent department before transport.

15.4 Manual Key and/or Access Control Logs

- A. Logs shall be maintained for sensitive keys and/or access to restricted areas as required and defined in this section.
- B. These logs shall be maintained by a designated custodial department/ key custodian and are the direct

responsibility of the department manager.

- C. Logs must be maintained and available for review and/or inspection for at least one (1) year.
- D. Key logs shall be maintained for all highly restricted areas and sensitive keys as follows:
 - 1. Number and/or description of the key issued;
 - 2. Time and date the key was issued;
 - 3. Signature and employee number of the individual receiving the key;
 - 4. Signature and employee number of the individual issuing the key;
 - 5. Reason the key was issued;
 - 6. Time and date the key was returned;
 - 7. Signature and employee number of the individual accepting the key at return; and,
 - 8. Signature and employee number of the individual returning the key.
- E. Manual access logs, where specific access is not granted as part of normal job duties, shall log

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entrance into highly-restricted areas. Such logs shall contain the following:

1. Area being accessed;
2. Date/time of entry;
3. Signature and employee number of employee entering highly-restricted area; and,
4. Purpose of visit.

15.5 Computerized Key Security Systems

- A. Computerized key security systems which restrict access to the gaming machine and table/card game drop and count keys through the use of passwords, keys, or other means, other than a key custodian, must provide the same degree of control as indicated in the key control standards of this section. These standards shall be applicable to all tier levels of gaming.
- B. The following additional gaming machine and table/card game key control procedures shall apply:
 1. Management personnel independent of the operational department (system administrator) shall assign and control user access to keys in the computerized key security systems to ensure that the gaming machine and table / card game drop and count keys

are restricted to authorized employees.

2. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) used to access the box containing the gaming machine and table/card game drop and count keys, requires the physical involvement of at least three persons from separate independent departments, including management, with the following documentation attested to by signatures of all participating employees signing out / in the emergency manual key(s):
 - a. The date and time; and,
 - b. The reason for the access.
3. The custody of the keys issued pursuant to Part 2 of this section requires the presence of two (2) persons from separate independent departments from the time of issuance until the time of their return.
4. Routine physical maintenance that requires accessing the emergency manual key(s) and does not involve the accessing of gaming machine and table/card game drop and count keys, only requires the presence of two (2) persons from separate departments with

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the following documentation attested to by signatures of all participating employees signing out/in the emergency manual key(s):

- a. The date and time; and,
- b. The reason for the access.

C. Accounting / Audit personnel independent of the system administrator shall perform the following procedures:

- 1. Daily review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system.
- 2. Determine whether the transactions completed by the system administrator provide an adequate control over the access to the gaming machine and table/card game drop and count keys.
- 3. Determine whether any gaming machine and table/card game drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized.
- 4. For at least one (1) day each month, review the report generated by the computerized key security system indicating

all transactions performed to determine whether any unusual gaming machine and table/card game drop and count key removals or key returns occurred.

- 5. At least quarterly, review a sample of users that are assigned access to the gaming machine and table/card game drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
- 6. All noted improper transactions or unusual occurrences are investigated with the results documented and submitted to the CNGC.

D. Quarterly, an inventory of all count room, drop box release, table/card game drop box release, storage rack, content keys, gaming machine door / access and reset / override / panel keys is performed and reconciled to records of keys made, issued, and destroyed.

E. Investigations are performed for all keys unaccounted for, with the investigation being documented, and submitted to the CNGC.

15.6 Gaming Systems Keys

A. For the installation of new gaming systems, standards set forth in Section 7.3(C) Gaming Systems –

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Machines of this document shall apply to this part.

- B. Storage server racks for gaming systems are required to be securely enclosed (covered backs with a lockable mechanism on the front panel).
- C. CNGC Agent(s) shall have sole custody of all keys to the logic board areas, or areas where programmable storage media are located.
- D. Upon verification of the proper locking mechanism of any gaming device, the following shall take place:
 - 1. Keys shall be logged by Security according to Key Inventory procedures in section 15.3;
 - 2. Gaming device keys shall be separately stored from other keys to prevent unauthorized access; and,
 - 3. Issuance of keys shall be determined based on the level of access and documented accordingly.

15.7 Bill Acceptor Canister/Drop Box Key Controls

- A. Procedures shall be developed and implemented to ensure that unauthorized access to empty

table/card game drop boxes shall not occur from the time the boxes leave the transport cart until they are placed on the tables.

- B. The involvement of at least two (2) persons independent of the cage department shall be required to access stored empty table/card game drop boxes.
- C. The release keys shall be separately keyed from the contents keys.
- D. For Tier A and B operations, at least two (2) count team members are required to be present at the time count room and other count keys are issued for the count. For Tier C operations, at least three (3) (two (2) for table/card game drop box keys in operations with three (3) tables or fewer) count team members are required to be present at the time count room and other count keys are issued for the count.
- E. For Tier A and B operations, at least two (2) drop team members are required to be present at the time drop keys are issued and returned. For Tier C operations, at least three (3) (two (2) for table/card game drop box keys in operations with three (3) tables or fewer) drop team members are required to be present at the time drop keys are issued and returned.

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15.8 Bill Acceptor Canister/Drop Box Release Keys

- A. The bill acceptor canister release keys shall be maintained by a department independent of the gaming department.
- B. Only the person(s) authorized to remove bill acceptor canisters from the gaming machines shall be allowed access to the release keys.
- C. Persons authorized to remove the bill acceptor canisters shall be precluded from having simultaneous access to the bill acceptor canister contents keys and release keys.
- D. For situations requiring access to a bill acceptor canister / drop box at a time other than the scheduled drop, the date, time, and signature of the employee signing out/in the release key must be documented.
- E. The table/card game drop box release keys shall be maintained by a department independent of the table/card games department.
- F. Only the person(s) authorized to remove table/card game drop boxes from the tables shall be allowed access to the table/card game drop box release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table/card game drop boxes.

- G. Persons authorized to remove the table/card game drop boxes shall be precluded from having simultaneous access to the table/card game drop box contents keys.

15.9 Bill Acceptor Canister/Drop Box Transport Cart Keys

- A. Persons authorized to obtain bill acceptor canister transport cart keys shall be precluded from having simultaneous access to bill acceptor canister contents keys, with the exception of the count team.
- B. For Tier C operations, Security shall be required to accompany the bill acceptor canisters transport cart keys and observe each time canisters are removed from or placed in storage racks.
- C. Persons authorized to obtain table/card game drop box transport cart keys shall be precluded from having simultaneous access to table/card game drop box contents keys, with the exception of the count team.
- D. For Tier C operations, a person independent of the pit department shall be required to accompany the table/card game drop box storage rack keys and observe each time table/card game drop boxes are removed from or placed in storage racks.

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15.10 Bill Acceptor Canisters/Drop Box Contents Keys

- A. The physical custody of the keys needed to access the contents of the stored, full bill acceptor canister/drop box contents, shall require the physical involvement of persons from two (2) separate departments, with the exception of the count team. Note: the key custodian checking out keys constitutes physical involvement.
- B. Issuance of the bill acceptor canister / drop box contents keys at other than scheduled count times shall require the involvement of at least two (2) persons for Tier A and Tier B and at least three (3) persons for Tier C operations from separate departments, one of whom must be a supervisor. The reason for issuance shall be documented with the signatures of all participants and observers. Two employees from separate departments are required to accompany the contents keys from the time the keys are issued until the time the keys are returned.
- C. Only the count team members shall be allowed access to bill acceptor canister / drop box contents keys during the count process.

15.11 Computerized Entry Access Control Systems

- A. The utilization of Computer Access Control Systems at any facility must be reviewed and approved by CNGC.
- B. Computerized entry access permissions must be controlled by one or more designated persons within Security Operations. A permissions matrix and/or procedures shall be established, as approved by the CNGC.
- C. The operation, as approved by the CNGC, shall establish procedures for reviewing access and reporting unauthorized access. Access control personnel shall review, at least quarterly, a sample of users that are assigned access to determine proper authorization and assurance.
- D. All noted unauthorized access shall be investigated with the results documented and submitted to the CNGC.
- E. Vendor access for the purpose of performing work shall require an escort for the duration of the work. The escort shall be a representative from the department relative to the work being performed (e.g. IT personnel for work being performed in data closets).
- F. Non-gaming facility personnel shall not be issued a sensitive key or given an access badge/card to access restricted areas without

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- approval from CNGC or a permit or license issued by CNGC.
- G. Individuals / employees must maintain possession of the access badge / card issued to them.
- H. A lost or stolen access badge/card shall be reported to Security immediately and the access badge/card must be rendered inactive. Any found access badges/cards shall be returned to Security.
- I. All employees/vendors that are issued an access badge / card must scan the access badge / card prior to entering any area that utilizes a computerized access device regardless of their access permissions.
- J. Access badges / cards assigned to any employee must be rendered inactive if:
1. The employee will be on leave for a period of two consecutive weeks or more;
 2. The employee is terminated or separates from the company; or,
 3. The employee is suspended.
- K. Actions under Part J of this section are governed as follows:
1. For J (1) and J (3), an employee may surrender
- his/her badge / card, which must be maintained by the employee's supervisor / manager or by Security. The badge/card may be re-issued upon the employee's return.
2. If the badge / card is not surrendered, the employee's supervisor / manager shall notify the Access Control Administrator to deactivate the badge/card. The badge / card may be reactivated upon the employee's return.
 3. For any employee that is terminated or otherwise separates from employment, the employee's supervisor / manager or Employee Services shall notify the Access Control Administrator by no later than the end of the next business day.
- L. Non-gaming facility personnel must surrender any and all issued keys and/or access badges / cards and the Access Control Administrator shall deactivate access badges / cards upon their termination of services or employment.
- M. Access permissions must be evaluated and changed according to the approved policy / matrix immediately upon notification of a change in employee status or position.

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**15.12 Password/Personal Identification
Number (PIN) Integrity**

Procedures shall be developed and implemented to ensure password / PIN integrity for access into casino operating systems, which shall include:

- A. Assignment of unique password/
PIN for each user.
- B. Sharing of passwords / PINS is
strictly prohibited.
- C. Passwords / PINS can only be
issued and/or changed by
Information Technology personnel.
- D. Security access shall be reviewed
by Information Technology on a
regular basis for terms or changes
in access.

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16.1 Standards for Marketing Programs

- A. Any marketing programs providing for the exchange of coupons or promotional participation for wagering incentives and/or the awarding of prizes, including the execution thereof, shall be approved by the Cherokee Nation Gaming Commission (CNGC); however, the CNGC Director may provide approval on a limited basis, to be affirmed by the CNGC Chairperson prior to implementation.
- B. Marketing programs shall be conducted in a manner, which is fair and equitable to the general public/eligible participants.
- C. Marketing programs shall be communicated in a manner that is not misleading to the public.
- D. Marketing programs shall be executed in the manner prescribed to and approved by the CNGC.
- E. Marketing programs shall be implemented by the marketing department, who shall have the responsibility of providing notice of approved marketing promotions to affected departments.
- F. The conditions for participation in promotional payments, including drawings, and give-aways programs, shall be prominently displayed or made available for

customer review at the casino operations.

- G. Marketing programs shall occur over a specified time period that shall be adhered to unless otherwise approved by the CNGC.
 - 1. Marketing programs involving a specifically timed event, such as a drawing for winner selection, shall be executed within thirty (30) minutes of the scheduled time approved by the CNGC.
 - 2. A delay greater than thirty (30) minutes of the approved scheduled time shall require the approval of the CNGC Director or their designee, evidenced in writing.
- H. Complaints and disputes regarding marketing programs are subject to the CNGC dispute resolution rules and regulations and/or the prize claim procedures under the approved Tribal-State Compact.

16.2 Promotional Submissions

- A. Casino operations shall develop procedures for promotion submission as approved by CNGC. Promotion submissions must be received at least thirty (30) days prior to the intended implementation date.

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- B. Minor revisions and/or cancellations to a previously approved promotion must be received at least ten (10) business days prior to the regular monthly CNGC Commission meeting.
- C. Subsequent to the regular CNGC Commission meeting, the CNGC Director, or his/her designee, may approve minor revisions and/or cancellations to a previously approved promotion provided the revisions are received no later than five (5) business days prior to the commencement of the promotion, and only if the advertisements do not adversely contradict or mislead the public.
- D. Any changes/revisions/cancellations to approved promotions that may adversely contradict/affect, or may otherwise mislead the public and/or cause the promotion to become questionable must receive CNGC approval. Approval may be granted by the CNGC Director, on a limited basis, and requires the concurrence of the CNGC Chairperson prior to effecting the change(s).
- E. Approved changes shall be displayed to the public and/or announced by the casino operations management, as required.
- F. Notice shall be provided to CNGC for affirmation of the approved changes at the next scheduled CNGC meeting.
- G. Late submissions may be considered solely at the discretion of the CNGC.
- H. Promotion submissions shall include, but not be limited to, the following information:
1. Promotion name;
 2. Promotion target audience (i.e., general public, players club members, seniors, men, women, and/or any combination which may or may not restrict participation);
 3. Promotion objective;
 4. Promotion summary;
 5. Promotion location, start/end date and time;
 6. Registration location, start/end date and time;
 7. Promotion execution, to include rules of play, prize structure, including the nature and value of the associated prize(s) or cash award(s), winner selection, winner notification, and prize claim procedures, as applicable to the promotion;
 8. Promotion registration methods;
 9. Promotion restrictions / limitations, and any other

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restrictions or limitations, including any related to the claim of prizes or cash awards;

10. Expected direct promotional expense and funding source;
 11. Number of coupons to be printed (as applicable);
 12. Rules governing promotions offered across multiple casino operations, third party sponsored promotions, and joint promotions involving third parties; and,
 13. Any other information as required and/or deemed necessary by CNGC.
- I. Promotions that have not received Commission approval or written tentative approval by the CNGC Director or his/her designee shall not be communicated (advertised) to the general public.
- J. After a promotion has been approved, sample copies of coupon/advertisements distributed to the public shall be sent to the CNGC and retained on file, as applicable.
- K. The Marketing department shall provide the CNGC a "Calendar of Events" which shall be adequately distributed to each affected department for all promotional activities on at least a monthly

basis, inclusive of any date revisions.

- L. Accounting and audit procedures shall be consistent for each promotion and shall be submitted to the CNGC for approval.
- M. Management shall ensure that all agreement/contracts entered into to provide goods or services to the marketing department shall contain language requiring the vendor to comply with the standards in this section. All agreements/contracts verbal or written shall be submitted and placed on file with the CNGC.

16.3 Marketing Programs – Rules and Regulations

- A. Any and all modifications to promotional terms and conditions require review and approval by the Director, or his/her written designee, and the concurrence of the CNGC Chairperson, prior to implementation.
- B. Eligible participants must be eighteen (18) years of age or older.
- C. Valid photo identification and/or a Players Club membership card are required to claim prize(s).
- D. The assignment of responsibility for all applicable federal and state taxes, licenses, registration, and other fees must be included in the

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materials submitted for approval and in all advertisements.

- E. Limit one coupon, redemption, prize, or ticket per person per promotion unless otherwise equitably controlled.
- F. Prizes and entries are non-transferable for qualified guests only.

16.4 Marketing Programs – Results Reporting

- A. Upon completion of a marketing program, a written report shall be provided to the CNGC detailing the results of a promotion, no later than thirty (30) days, unless otherwise requested after the closure of the promotion.
- B. The Marketing Program Report shall contain the following minimum information:
 - 1. Promotion name;
 - 2. Promotion start date and time;
 - 3. Promotion end date and time;
 - 4. Total number of promotion entrants/redemptions (estimates may be acceptable depending upon the type of promotion);
 - 5. Promotion Winners List and associated prize awarded (if

applicable to the promotion); and,

- 6. Promotion Expense Statement.
- C. Marketing programs that involve the issuance of an item, which is equal in value to all participants, need only report the total number of redemptions and the item issued by the casino operations.
- D. All entries are subject to review and verification.

16.5 Promotional Drawings

- A. Electronic drawing machines, devices, and/or systems may be used provided that the controls/procedures utilized by these machines/devices provides at least the same level of control as required by these standards, as approved by the CNGC.
- B. The casino operation shall establish and comply with procedures as approved by the CNGC regarding the conduct of all drawings, which shall include these standards and ensure the integrity of the promotion.
 - 1. Drawing tickets shall be maintained in a visible, secure, and lockable container, with proper key and access controls, subject to Section 16 of this document.

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2. Access to hopper shall be restricted until time of drawing.
3. Drawing tickets shall be at least two (2) parts: one part to remain in a secured drawing hopper and the second part to remain with the customer; one part, which shall remain in a secured hopper until the drawing occurs and shall contain fields for Promotion Name, Customer Name, Address, City, State, Zip, and phone number with area code.
4. Drawing tickets shall be in a pre-numbered continuous numerical series, and only in one series at a time; carnival or generic tickets are prohibited.
5. Tickets for cash or prizes shall be printed in a manner which mitigates the risk of counterfeiting.
6. Drawing tickets shall be safeguarded and adequate procedures shall be employed in the distribution, use, and control of the same.
7. A log shall be kept to track all unissued and issued tickets to the casino operation. Same or similar tickets may be used for different drawings; however, the continual series for each shall not be broken (i.e. series 100-1000 shall be reserved for drawing #1 and series 1001-

2000 shall be reserved for drawing #2, etc.).

- C. Rules regarding the conduct and qualifications of the drawing shall be posted or otherwise made available to all customers.
- D. Used drawing tickets shall be retained for a thirty (30) day period following the conclusion of the drawing for audit and investigative purposes and disposed of in a manner approved by the CNGC to prevent re-use.

16.6 Procedures for Redemption

The procedures for the redemption of coupon, complementaries, vouchers, tickets, or similar marketing items shall comply with Section 12 – Casino Instruments and Exchanges and Section 4 General Provisions – Currency Handling of this document, as applicable.

16.7 Printed Coupons

- A. Negotiable coupons, including those exchangeable for non-cashable credits, chips, entries, etc., shall be original instruments and shall contain at a minimum, the following information:
 1. A sequentially, pre-numbered serial number to prevent duplication and possible alteration. Alternatively, a coupon validation system may

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- be used that provides at least the same level of control;
2. A description of the value of the coupon, in numeric and alpha form;
 3. A description of the manner in which the patron redeems the coupon;
 4. The name and location of the casino operation for which the coupon has been issued. For promotions covering one or more locations, each valid location must be printed;
 5. The dates for which the coupon is valid or the expiration date of the coupon;
 6. Any restrictions and/or limitations; and,
 7. Surveillance must be able to distinguish between different coupon types and identify their value.
- B. The utilization of manual coupons, photocopies, or generic coupons that do not meet the above standards is strictly prohibited.
- C. All non-direct pre-printed mail coupons shall be inventoried and secured by an individual from an independent department.
1. The issuance of coupons to marketing personnel shall be

- documented with a signature or initials and employee number by the inventory control department and marketing. The document log shall include the serial number of the coupons issued.
2. A similar log shall be maintained by marketing when issuing coupons for distribution.
 3. Undistributed coupons shall be logged and secured by marketing.
 4. Undistributed coupons shall be maintained for a period of not less than 30 (thirty) days following the expiration of the promotion.
- D. At the end of promotion, a comparison of the amount of coupons distributed to the amount of coupons redeemed shall be reviewed for reasonableness by the accounting / revenue audit department.
- E. Redeemed coupons shall be retained for a period of not less than ninety (90) days.

16.8 Marketing Program Vendors

- A. Direct Mail and/or Print Contract Vendors, who print/distribute coupons, shall be a licensed gaming vendor.

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B. Any authorized official procuring goods or services as defined in paragraph (A) of this Section shall be responsible for notifying and supplying potential vendors with a copy of these regulations. Failure to comply with these standards may result in denial/revocation of the vendor's gaming license.

C. Direct Mail and/or Print Vendors who print negotiable coupons, shall provide the following information as an additional requirement to being a licensed gaming vendor:

1. A statement of the means by which the coupons are secured while still in possession of the vendor;
2. Proof of Performance Bond for a value of at least One Million Dollars (\$1,000,000.00); and,
3. A signed copy of the non-disclosure agreement between the vendor and the casino operation.

D. Upon the completion of an executed Print Order, the vendor and/or the casino operation shall provide the following information to the CNGC:

1. Total number of coupons printed;
2. Total dollar face-value of coupons printed;

3. Starting serial number;

4. Ending serial number;

5. Total number of coupons mailed;

6. Total dollar face-value of coupons mailed;

7. Total number of "waste" or excess coupons;

8. Total dollar face-value of "waste" or excess coupons; and,

9. Disposition of "waste" or excess coupons.