

**SECTION 26**  
**PULL TABS**

~~2.1 Computer Applications 542.8(a)~~

~~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, as approved by the Commission, will be acceptable.~~

**6.1 Pull Tab Inventory**

- A. Pull tab inventory (including unused tickets) shall be controlled to ensure the integrity of the pull tabs.
- B. All pull tab inventory (including unused tickets, tickets utilized by electronic gaming machines, and pre-loaded electronic cartridges) shall be inventoried and secured by a person or persons independent of the pull tab/custodial department.
  - 1. Redeemed pull tabs shall be retained for a period of no less than ninety (90) days from the date of redemption, provided that any tabs subject to dispute and/or investigation are to be kept until such time as the dispute and/or investigation may be concluded; any disputes/investigations must be documented and made available for inspection to representatives of the Cherokee Nation Gaming Commission (CNGC).
  - 2. After ninety (90) days has elapsed, the pull tabs may be destroyed ~~by a method(s)~~ as provided for by management and approved by the Commission CNGC.

- a. Pull tabs may either be destroyed on-site or transported to a central location for destruction.
- b. Procedures for the transportation of pull tabs to a central location must also be approved by the Commission CNGC.
- C. The issue of pull tabs to the cashier, ~~or sales, or distribution point location~~ shall be documented with signature or initials and employee number of the ~~person~~ receiving employee responsible for inventory control and the cashier. The document log shall include the serial number of the pull tabs issued.
- D. Appropriate documentation shall be given to the redemption booth for purposes of determining if the winner purchased the pull tab from the pull tabs issued by the gaming operation. ~~For electronic verification, see Section 3 for Gaming Machines 3.21 (K) and (L).~~ Electronic verification satisfies this requirement.
- E. At the end of each month, a person or persons independent of pull tab/custodial department ~~sales~~ and/or inventory control shall complete a physical count of pull tabs on hand; variances between physical and perpetual inventory records shall be documented prior to adjustments. Adjustments to perpetual inventory records to actual physical counts shall be made by a person or department independent of the pull tab department, inventory control,

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and the person(s) responsible for month-end physical counts.

F. A monthly comparison for reasonableness (+/- 3%) shall be made of the amount of pull tabs sold from the pull tab/inventory control log to the amount of revenue recognized.

G. For pull tabs used for promotional purposes, reporting requirements as required under Section 16.4 Marketing Promo - Results shall apply.

H. Procedures for the disposal, destruction, or retirement of pull tab inventory shall be approved by the **Commission CNGC**.

### 6.2 Access

Access to pull tabs shall be restricted to authorized persons. The gaming operation shall maintain a list which shall be, communicated to the **Commission CNGC**, of authorized persons with access to pull tabs.

### 6.3 Transfers

Transfers of pull tabs from storage to the sale/distribution location shall be independently controlled and accompanied by Security.

### 6.4 Winning Pull Tabs

A. Winning pull tabs shall be verified and paid as follows:

1. Payouts of **Five Hundred Dollars (\$500.00)** ~~\$500~~ or more shall be

verified by at least two (2) employees;

2. Total payout shall be computed and recorded by shift; and,
3. The winning pull tabs shall be defaced/voided so that they cannot be presented for payment again.

B. Personnel independent of the pull tab operations, in which a list shall be communicated to the **Commission CNGC**, shall verify and attest by signature or initials and employee number the amount of winning pull tabs redeemed each day.

### 6.5 Accountability Form

A. All funds used to operate the pull tab game shall be recorded on an accountability form.

B. **All funds used to operate the pull tab game** ~~These funds~~ shall be counted and verified independently by the assigned clerk and the cage cashier then reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are **PROHIBITED** prohibited.

C. Transfer of funds to and from the pull tab operations shall be documented by recording the following:

1. Date;
2. Shift (if applicable);
3. Session (if applicable);

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4. Transaction type (issue/return);
5. Dollar amount;
6. Signature or initials and employee number of clerk; and,
7. Signature or initials and employee number of cage cashier.

**6.6 Standards for Statistical Reports**

- A. Records shall be maintained, which include win, write (sales), and a win-to-write hold percentage as compared to the theoretical hold percentage derived from the flare, for each deal or type of game, for:
  1. Each shift;
  2. Each day;
  3. Month-to-date; and,
  4. Year-to-date or fiscal year-to-date as applicable.
- B. ~~Accounting~~ A manager, independent of the operation, shall review statistical information at least on a monthly basis and shall investigate any large or unusual statistical fluctuations.
- C. These investigations shall be documented and maintained for ~~NIGC~~ inspection and provided to the ~~Commission~~ CNGC upon request.
- D. Each month, the actual hold percentage shall be compared to the theoretical hold percentage. Any

significant variations (+/-3%) shall be investigated.

- E. ~~Upon the completion of the pull tab deal the gaming operation shall submit the statistical report of actual revenue realized as compared to the theoretical hold percentage obtained from the flare~~ Statistical reports shall be made available to the ~~Commission~~ CNGC upon request.
- F. Gaming operations shall obtain ~~from the vendors~~ and submit the flare of each deal or the vendor's theoretical hold computation worksheet to the ~~Commission~~ CNGC.

**6.7 Pull Tab and Electronic Equipment**

- A. ~~The access and control of pull tab equipment shall be held to the standards in Section 17 for Equipment Standards.~~
- B. ~~If the gaming operation utilizes electronic equipment in connection with the play of pull tabs, then the standards in Section 8 for Drop and Count and Section 3 for Gaming Machines in this document shall apply, according to tier levels of operation.~~
  - A. If the electronic equipment uses a bar code or microchip reader, the reader shall be tested periodically to determine that it is correctly reading the bar code or microchip.
  - B. If the electronic equipment contains a bill acceptor, then Section 13 Drop and Count (as applicable) shall apply.

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- C. If the electronic equipment returns a voucher or a payment slip to the player, then Section 12.7 Casino Instruments & Exchanges (as applicable) shall apply.
- D. If the electronic equipment utilizes patron account access cards for activation of play, then Section 12.10 Casino Instruments & Exchanges (as applicable) shall apply.