



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

**Coupon and Other Complimentary  
Distribution Program Controls**

**Document No. DGR - 22**

**Effective: April 1, 2009**

**Part I. Introduction.**

For the purposes of this regulation, a complimentary distribution program is a contest or promotion pursuant to which complimentary services or items are provided directly by the Gaming Enterprise to the public. No complimentary services, items, cash, cash equivalents i.e. bonus play or points, gaming chips, or slot tokens may be distributed by the Gaming Enterprise under any redemption complimentary distribution program that does not comply with the requirements of this regulation.

**Part II. Coupon control and redemption.**

**Section 1.** Each coupon or part thereof issued by the Gaming Enterprise shall only be redeemable for a specific amount of cash, cash equivalents, gaming chips, slot tokens, a specific service or item, or a multiplier to be applied to an earned point or comp value.

**Section 2. Control ledger.** The Gaming Enterprise shall maintain a coupon control ledger in a manner approved by the GRA Board. The coupon control ledger shall contain, at a minimum, all of the following:

- A. For external printers:
1. The date the coupons were received.
  2. The type and quantity of coupons.
  3. The beginning and ending serial number.
  4. The purchase order number.
  5. The name and file number of all associates who examined the coupons upon receipt.
  6. The date the coupons were issued to the coupon distribution department.
  7. The number and quantity of coupons issued to the distributing department.

8. The balance of un-issued coupons on hand.
  9. The name and file number of the associate issuing the coupons
  10. The name and file number of the associate receiving the coupons.
  11. A record and explanation of any deviations noted.
- B. For in-house printing:
1. The date the coupons were issued to the coupons distribution department.
  2. The number and quantity of coupons issued to the distribution department.
  3. The balance of un-issued coupons on hand.
  4. The name and file number of the associate issuing the coupons.
  5. The name and file number of the associate receiving the coupons.
  6. A record and explanation of any deviations noted.
- C. A coupon redeemable for gaming chips shall be designed and printed so that the denomination and type of the coupon is clearly visible from Surveillance when accepted or being wagered at a gaming table and when deposited in a drop box. A match play coupon shall contain an area designed for the placement thereon of the required gaming chips, which shall be located on the coupon so as not to obscure or interfere with visibility of the type and denomination of the coupon.

**Section 3. Redemption.** Coupons shall be redeemed in the following manner:

- A. Coupons redeemable for coin, currency, or slot tokens shall be redeemed only by a players club associate.
- B. Coupons redeemable for other services or items with a dollar value to the Gaming



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Enterprise shall be redeemed by associates designated pursuant to procedures submitted in accordance with Section 6, Subsection L, of this regulation.

**Section 4. Coupon storage.** Coupon storage location shall be disclosed pursuant to Section 6, Subsection J, of this regulation. Coupons shall only be stored in locations which allow surveillance coverage of the actual coupons when being accessed and the associates involved in handling the coupons.

**Section 5. Coupon reconciliation form.** The department responsible for distributing the coupons shall maintain a daily coupon reconciliation form. One daily coupon reconciliation form shall be completed to account for all associates responsible for distributing coupons to guests. The daily coupon reconciliation form shall include, at a minimum, all of the following:

- The date.
- The type of coupon being issued.
- The beginning and ending serial numbers of the coupons the associate has to distribute to guests.
- The quantity of coupons distributed.
- The total number of coupons left un-issued.
- The serial numbers of any coupons that were voided and the reason the coupons were voided.
- The name and file number of the associate distributing the coupons to guests and completing the form.
- Any variations discovered and an explanation of the variations.

**Section 6. Internal controls.** Detailed internal control procedures controlling all coupon and complimentary distribution program entitling

guests to complimentary services, items, cash, gaming chips, or slot tokens, shall be prepared prior to implementation of the programs and shall be maintained by the administering department. Amendments to procedures must be continuously maintained and updated by the Gaming Enterprise and submitted to the GRA Board pursuant to Detailed Gaming Regulation 15 (II)(6). The internal control procedures shall include, at a minimum, all of the following information:

- The Gaming Enterprise department that will be responsible for administering the coupon distribution program.
- The security measures that will be taken with respect to the coupons including, but not limited to, all of the following information:
  - The manner in which the coupons will be ordered.
  - The manner in which the coupons will be inventoried upon receipt by the Gaming Enterprise.
  - The manner in which the coupons will be stored and the individuals who will have access to the coupons.
  - The manner in which discrepancies will be handled.
  - The manner in which coupons will be voided.
- The manner in which the coupons will be distributed.
- The schedule for conducting routine inventories of active un-issued coupons. The inventory shall be conducted monthly by not less than two associates from separate departments. The results of the inventory shall be recorded in the coupon control ledger.



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- E. The manner in which coupons will be removed from the inventory, recorded, and voided once the coupons become inactive.
  - F. The manner in which the department responsible for distributing the coupons can requisition coupons from the casino department responsible for storing the coupons, if applicable.
  - G. The maximum number of days in advance of an event that coupons can be requisitioned by the Gaming Enterprise department responsible for distributing the coupons – including any additional procedures necessary for emergency situations that might violate this requirement. The requisition document shall contain, at a minimum, all of the following information:
    - 1. The date the requisition is prepared.
    - 2. The day and date for which the coupons are needed.
    - 3. The type(s) of coupons that are requested.
    - 4. The number of coupons required.
    - 5. The name and file number of the associate completing the requisition.
    - 6. The name and file number of the supervisor authorizing the requisition.
  - H. The Gaming Enterprise department responsible for storing the coupons shall complete all of the following information before the coupons are given to the casino department responsible for distributing the coupons:
    - 1. The name and file number of the associate filling the order.
    - 2. The beginning serial number of the coupons issued.
    - 3. The ending serial number of the coupons issued.
    - 4. The total number of and type of coupons issued.
  - 5. A record and explanation of any coupons that were voided due to discrepancies.
  - I. The manner in which the coupons will be issued. The Gaming Enterprise shall require that coupons shall be printed with an expiration date.
  - J. The location of the secured area in which the coupons will be held by the department responsible for distributing the coupons to guests.
  - K. The Gaming Enterprise shall assure that coupons that are distributed shall be entered in the coupon control ledger.
  - L. The manner in which coupons may be redeemed by guests (chips, tokens, cash, cash equivalents, and/or other items with a dollar value to the Gaming Enterprise).
  - M. The manner in which coupons redeemed by guests will be cancelled.
  - N. The manner in which the coupons distributed, coupons not distributed, and coupons issued will be reconciled.
  - O. The manner in which coupons that have been issued, but not distributed to guests in the appropriate time frame, will be voided and reconciled.
  - P. The manner in which a dealer, cashier or other authorized associate shall receive and account for coupons redeemed by guests.
- Part III. Promotional Drawing Rules.**
- Section 1. Definition.**  
“Drawing” or “Promotional Drawing” means an event that awards item(s) of value to a guest, the award of which is based on chance.
- Section 2. Selection Procedures.**
- A. If the winner is selected electronically, the selection shall be made by use of a random number generator (RNG) that is tested and



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approved by the independent gaming testing laboratory.

- B. If the winner is selected through means other than an electronic device, reasonable effort should be made to ensure the randomness of the drawing.

**Section 3. Rules Availability.**

- A. The rules for all promotional drawings shall be clearly posted for guests at the gaming location(s) at which the drawing will be conducted and be clearly indicated on any promotional materials or entry forms provided to the guests.
- B. The rules identified in Subsection A of this Section shall at a minimum, include information pertaining to the following items:
1. Any other conditions on entry, including registration or player's club membership;
  2. Drawing dates and times, including information whether the entrant is required to present at the time of the drawing; and
  3. Number of permissible entries per person.

**Part IV. Miscellaneous Items.**

Miscellaneous items (other than cash, cash equivalents, gaming chips, or slot tokens) with dollar value to the Gaming Enterprise of \$50 or greater to be distributed to guests through coupon or complimentary distribution programs, promotional drawings, or other promotions shall be inventoried regularly with documentation.

**Part V. Reporting.**

- A. The Gaming Enterprise shall:
1. Prepare a quarterly report which shall list, by type of coupon, the total number

of coupons issued, the total number of coupons redeemed, the total value of the complimentary cash, cash equivalents, gaming chips, or slot tokens given to guests in redemption of coupons, which shall be made available to the GRA upon request.

2. Prepare a quarterly report which shall list, by program offered during the quarter, a description of the complimentary services or items provided, the total number of persons receiving complimentary services or items, the total dollar amount of complimentary services or items provided, and the names of all persons receiving a complimentary item or service in a dollar amount greater than \$100. Such a report shall be made available to the GRA upon request.
- B. The report shall be signed by the Marketing Director, or a higher designee, indicating that no material discrepancies in excess of \$100 per program were noted for the period covered by the report or if a material discrepancy is noted it shall be explained in detail.

**History.** Approved by the Gaming Regulatory Authority Board on December 4, 2008.

**Effective Date: April 1, 2009.**