



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

MAIN BANK AND CAGE CONTROLS

Document No. DGR – 15

Effective: April 8, 2011

I. COMPUTER APPLICATIONS.

Section 1. 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 will be acceptable. Any such documentation and/or procedures shall require GRA Board approval prior to implementation.

II. PERSONAL CHECKS, CASHIER'S CHECKS, TRAVELER'S CHECKS, PAYROLL CHECKS, AND COUNTER CHECKS.

Section 1. If personal checks, cashier's checks, traveler's checks, payroll checks, or counter checks are cashed at the cage. For each check cashing transaction, the cage cashier shall:

- A. Verify the customer's identity by examining identification or other method to ensure the customer's identity. The identification information shall be documented on the check unless the information is maintained elsewhere. In such cases, record "account on file" on the check as the verification source and results.
- B. Examine the check to ensure it includes the customer's name, current address, and signature.
- C. For personal checks, verify the customer's check cashing authority and record the source and results in accordance with management policy.
- D. It is recommended that a reasonable effort be made to verify the business authenticity of payroll checks and the authenticity of cashier checks.
- E. If a check guarantee service is used to guarantee payment and the procedures required by the check guarantee service are followed, then the above requirements do not apply.

Section 2. When counter checks are issued, the following shall be included on the check:

- A. The customer's name and signature;
- B. The dollar amount of the counter check (both alpha and numeric);
- C. Customer's bank name, bank routing and account numbers;
- D. Date of issuance; and
- E. Signature of the person approving the counter check transaction.

Section 3. When traveler's checks or other guaranteed drafts such as cashier's checks are presented, the cashier shall comply with the examination and documentation procedures as required by the issuer.

III. CUSTOMER DEPOSITED FUNDS.

Section 1. If a Gaming Enterprise permits a customer to deposit funds for safekeeping purposes with the Gaming Enterprise at the cage, the following standards shall apply.

- A. The receipt or withdrawal of a customer deposit shall be evidenced by at least a completed two-part document with one copy given to the customer and one copy remaining in the cage.
- B. Each of the two parts of the sequentially-numbered receipt shall contain the following information:
 1. Same receipt number on each copy;
 2. Customer's name and signature;
 3. Date of receipt and withdrawal;
 4. Dollar amount of deposit/withdrawal;
 5. Nature of deposit/withdrawal (cash, check, chips); and
 6. Employee's name and signature who conducted the transaction.



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IV. SAFE DEPOSIT BOXES.

Section 1. The issuance and closure of a customer's deposit box in the cage shall be evidenced by a document that includes the following information:

- A. Safe deposit box number;
- B. Date of issuance and closure;
- C. Customer's name and signature;
- D. Type of identification, identification number, expiration date of identification, and date identification was examined. The customer's driver's license is the preferred method of verifying customer identity. A passport, government issued identification, non-resident alien identification card, or another picture identification normally accepted as a means of identification when cashing checks, may also be used;
- E. Employees' name and signature that issued or closed the safe deposit box.

Section 2. Procedures shall be established to maintain a detailed record of all cage/vault safe deposit boxes and the current status of each box (i.e. issued, not issued).

Section 3. The preceding procedures for maintaining accurate records on the issuance and closure of safe deposit boxes must also be adhered to in non-gaming areas.

V. CAGE AND VAULT ACCOUNTABILITY STANDARDS.

Section 1. The Gaming Enterprise shall establish and comply with procedures that include:

- A. All transactions that flow through the cage shall be summarized on a cage accountability form for each of the cage's shifts and shall be supported by documentation.
 1. Increases and decreases to the total cage inventory shall be supported by documentation. For any individual increase/decrease which exceeds \$100.00 documentation shall include:
 2. Date and shift;
 3. Purpose of the increase/decrease;
 4. Person(s) completing the transaction; and
 5. Person or department receiving the cage funds (for decreases only).
- B. The cage and vault (including coin room) inventories shall be counted by at least two individuals at the beginning and end of each work shift. These persons shall make individual counts for comparison for accuracy and maintenance of individual accountability. Such counts shall be recorded at the beginning and end of each shift during which activity took place. All discrepancies shall be noted and investigated. The results of any such investigation shall be reported to the OGR&C.
- C. The type of transactions to be performed by each of the casino cashiering areas.
- D. The even exchange of funds between two (2) casino cashiering areas or between a casino cashiering area and token or change banks, which shall include the following:
 1. A designation of the associates who may process the even exchange transaction.
 2. A description of the even exchange form and the required information and signatures. This form should be at least a two (2) part form.
 3. A description of the distribution of each part of the form.
 4. Types of items allowed to be exchanged.



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5. Requirement that security personnel must accompany the transfer of funds between locations at an amount determined by management.
 - E. The control of ATMs, kiosks, and cash-out ticket redemption machines by the main bank or vault. Such procedures shall at minimum include:
 1. Description of procedures for bringing machines back to imprested amounts.
 2. Designation of the associates who shall keep machines at imprested amounts.
 - F. The preparation and deposit of funds to the bank. Such procedures shall at minimum include:
 1. Preparation and verification cash and coin;
 2. Procedures for mutilated money;
 3. Verification of checks;
 4. Security Escort; and
 5. Even exchange procedures between bank and enterprise.

Section 2. Each Gaming Enterprise shall establish and comply with a minimum bankroll formula to ensure each Gaming Enterprise maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the Gaming Enterprise's customers as they are incurred. Such formula shall include at minimum:

- A. Cash Available;
- B. Required Bankroll;
- C. Per Gaming Area Requirements; and
- D. Variable Amounts Requirements.

VI. CHIP AND TOKEN STANDARDS.

Section 1. The Gaming Enterprises shall establish and comply with procedures for the receipt, inventory, storage, and destruction of gaming chips and tokens. Such procedures shall include at minimum:

- A. Personnel involved;
- B. Notification procedures;
- C. Inspection procedures; and
- D. Verification procedures.

VII. PROMOTIONAL PAYOUTS, DRAWINGS, AND GIVEAWAY PROGRAMS.

Section 1. These standards apply to any payout resulting from a promotional payout, drawing, or giveaway program (i.e. paycheck wheels) disbursed by the cage department. Such payouts are associated with gaming activity or a promotional program to encourage customer participation in gaming activities. However this section does not apply to programs that are addressed elsewhere in this regulation.

- A. The conditions for participating in promotional payouts, including drawings and giveaway programs, shall be prominently displayed or available for customer review at the Gaming Enterprise.
- B. Payouts of \$100.00 or more shall be documented at the time of the payout. Documentation shall include the following:
 1. Date and time;
 2. Dollar amount of payout or description of personal property (i.e. car);
 3. Reason for payout (i.e. name of promotion);



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4. Customer's name (drawings only);
 5. Signature(s) of the following number of employees verifying the promotional payout with the customer:
 - (a) Two employee signatures for all payouts of \$100 or more; or
 - (b) For computerized systems that validate and print the dollar amount of the payout on a computer-generated form, only one employee signature is required on the payout form.
 6. 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 the employees completing the payout with the customer.
- C. For payouts that are less than \$100, documentation shall be produced to support the cage accountability. Such documentation may consist of a line item on a cage accountability document (i.e. "25 \$10 cash giveaway coupons = \$250).

VIII. EXTRANEIOUS ITEMS.

Section 1. Each Gaming Enterprise shall establish and comply with procedures to address the transporting of extraneous items, such as coats, purses and/or boxes, into and out of the cage, coin room, count room and/or vault. At minimum the policy shall address:

- A. Specifically what items are allowed;
- B. Designated locations for extraneous items;
- C. Surveillance notification, (which shall include when Surveillance must be notified prior to the introduction or removal of extraneous items);
- D. Access to personal items during shift; and
- E. Security checks of items that are not easily visible to surveillance (i.e. boxes, garbage, etc.).

IX. UNIFORMS.

Section 1. Each Gaming Enterprise shall establish and comply with policies regarding proper uniforms in the cage, coin, vault, cashier booths and/or coin rooms. Such policies shall include at minimum:

- A. Areas that require clothing that either has no pockets or pockets are sewn shut;
- B. Areas that require wearing of aprons; and
- C. Wearing of jackets or sweaters.

History. Approved by the Gaming Regulatory Authority on April 8, 2011. **Effective date April 8, 2011.**