Mille Lacs Band of Ojibwe Indians
Gaming Regulatory Authority
Office of Gaming Regulation and Compliance

July 23, 2026

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 305(b)(2), this serves as the official Notice of Adoption the following:

Changes to:
DETAILED GAMING REGULATION – 14 Patron Deposit Accounts

Summary of changes, to DGR 5 Class II Technical Standards include:

1. New numbering and easy to read format.
2. Expansion on Patron Wagering Accounts section in DGR 12a
3. Expanded to cover not just remote session Bingo, but patron deposits for Class II mobile wagering for games other than session Bingo

Effective Date: September 21, 2026.

The GRA attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the GRA Office of Gaming Regulation & Compliance and at https://millelacsband.com/home/indian-gaming-regulation/gaming-regulations-resolutions

______________________________ 7/23/26
Gaming Regulatory Authority Board Date

Mille Lacs Band of Ojibwe Indians

Gaming Regulatory Authority

Detailed Gaming Regulations

DGR- 14 Patron Deposit Accounts

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1. General Patron Deposit Account Standards

1.1. The following patron deposit accounts (collectively, "Patron Deposit Accounts") shall comply with the Patron Deposit Account Standards of this DGR:

1.1.1. Front money accounts

1.1.2. Class II mobile wagering accounts

1.1.3. Cashless wagering accounts

1.2. The Gaming Operation shall develop a system of internal controls for system security, operations, accounting, and reporting including independent review of the annual system integrity and security assessment.

1.3. The Gaming Operation shall maintain Patron Deposit Records in accordance with the standards set forth in Standards for Bank Secrecy Act.

1.4. The Gaming Operation shall prominently display or make available for patron review, the rules and policies for Patron Deposit Accounts (including the awarding, redeeming and expiration of points and deposited funds).

1.5. The Gaming Operation shall provide the Patron Deposit Account holder with a secure method of access to the account. Account records shall be made available upon reasonable request.

1.6. Patrons shall only have one wagering account and they shall be:

1.6.1 Non-transferable;

1.6.2 Unique to the patron who establishes the account; and

1.6.3 Distinct from any other account the patron may have established.

2. Establishing a Patron Deposit Account

2.1. The Gaming Operation shall develop a system of internal controls for establishing a Patron Deposit Account, which shall include the following:

2.1.1. The patron shall appear at the Gaming Operation in person at a designated area of accountability.

2.1.2. Patrons shall be restricted to one deposit account.

2.1.3. Controls shall include photo identification requirements necessary for opening an account, which shall include, but are not limited to, the following:

a. At the time the account is opened, initial and any additional deposits are made, withdrawals made, or account closed, the identity of the patron must be verified by examination of a valid government issued ID.

b. An authorized associate shall examine the patron's identification, in the presence of the patron, and verify the patrons:

i. Legal name and current physical address;

ii. Date of birth;

iii. Telephone and mobile account number (if applicable);

iv. Electronic mail address;

2.1.3 Upon establishment of the Patron Deposit Account, the Gaming Operation shall perform the following:

a. Verify the patron is not excluded

b. Verify the patron is not prohibited from gaming

2.1.4 Documentation for establishing a Patron Deposit Account shall include, but is not limited to, the following:

a. Type, number, and expiration date of the identification

b. Patron's name

c. Patron's permanent address

d. Social Security number or TIN

e. Date of birth

f. A unique account identifier

g. Date the account was opened

h. Name and file number of the associate establishing the account

i. Date identification is verified

j. Patron signature, acknowledging and accepting terms and conditions, before activating the account. Electronic signature, if available, is acceptable

2.1.5 Patron will be provided with a copy of the signed terms and conditions. If signed electronically, patron copy does not have to be signed.

3. Patron Deposit Account Activity

3.1. Funds may be added or withdrawn from a Patron Deposit Account for the following, as applicable:

3.1.1. Patron game play

3.1.2. Patron deposits

3.1.3. Patron withdrawals

3.1.4. Authorized adjustments

3.1.5. Any other means approved by the GRA

3.2. Transfers of funds from one Patron Deposit Account to another patron are prohibited.

3.3. The Gaming Operation shall develop a system of internal controls for Patron Deposit Account activity including, but not limited to, the following:

3.3.1. Process for verification of the patron, account, and availability of funds

a. A unique (not guests' birthday, etc.) personal identification number (PIN) shall be an acceptable form of verifying identification.

b. The Gaming Operation shall re-verify a patron's identification at least annually.

3.3.2. Process for the deposit and withdrawal of funds from a Patron Deposit Account

3.3.3. If an associate completes authorized adjustments to the Patron Deposit Account, procedures shall include, but are not limited to, the following:

a. Authorized adjustments shall be sufficiently documented with the following:

i. Signature and file/identification number of the associate processing the transaction. In the case of an automated system being used, the associates name and file/identification number shall be recorded.

ii.

iii. A description of the change

iv. The time and date of change

v. The reason(s) for change

b. Changes shall be authorized by a manager/supervisor.

3.3.4. The addition or deletion of credits and currency to/from Patron Deposit Accounts, other than through an automated process related to actual play, shall be sufficiently documented to enable Accounting/Audit associates to track changes.

a. The addition or deletion of credits and currency to patron accounts authorized by supervisory associates shall be documented.

b. The documentation requirements for adjustments do not apply to the deletion of credits related to inactive or closed accounts through an automated process.

3.3.5. Privacy of patron information requirements

3.3.6. Procedures for investigating all patron complaints and providing a response to the patron

3.4. Documentation for processing Patron Deposit Account transactions shall include the following:

3.4.1. Same transaction number on all copies

3.4.2. Date and time of transaction

3.4.3. Name or other identifier of the patron

3.4.4. The unique Patron Deposit Account identifier

3.4.5. Transaction location (player interface, kiosk, cashiering station)

3.4.6. Type of transaction (deposit, withdrawal, or adjustment)

3.4.7. For adjustments to the account, the reason for the adjustment

3.4.8. Amount of the transaction (both alpha and numeric)

3.4.9. Nature of deposit, withdrawal, or adjustment (cash, check, chips, or other gaming instrument.)

3.4.10. Patron signature for withdrawals, unless a secured method of access is utilized (i.e. PIN)

4. Standards for Mobile Wagering and Cashless Wagering Accounts

4.1. In addition to the Patron Deposit Account requirements, the standards in this section shall apply to the following (collectively “Mobile/Cashless Wagering Deposit Accounts”):

4.1.1. Class II mobile wagering accounts

4.1.2. Cashless wagering accounts

4.2. All terms and conditions for mobile gaming and cashless wagers shall be included as an appendix to the Gaming Operation’s system of internal controls.

4.3. The Gaming Operation shall maintain a dedicated bank account for Mobile/Cashless Deposit Accounts.

4.4. Documentation for establishing a Mobile/Cashless Deposit Account shall include the following:

4.4.1. A username

4.4.2. Password of sufficient length and complexity to ensure its effectiveness

4.4.3. Option for users to choose “strong authentication (multi-factor authentication (MFA))” log in protection

4.4.4. Electronic notification to the patron’s registered email address, cellular phone or other device each time a mobile gaming account is accessed, if applicable, provided that a patron may opt out

4.4.5. Patron’s certification the information provided is accurate

4.4.6. Patron’s acknowledgement that the legal age for mobile gaming is eighteen (18) and that he/she is prohibited from allowing any other person to access their wagering account

5. Standards for Class II Mobile Wagering

5.1. The gaming system shall detect the physical location of a patron upon logging into the gaming system. If the system detects that the physical location of the patron is in an area unauthorized for mobile gaming, the system shall not accept wagers, deposits, or withdrawals until the patron is in an authorized location.

5.2. The gaming system shall display the date and time of patron's previous log on.

5.3. For Class II mobile wagering accounts (“Class II Mobile Wagering Account”) the additional standards in this section shall apply.

5.4. The Gaming Operation shall develop the maximum deposit amount allowed above the cost of the bingo package purchased for Class II Mobile Wagering Accounts. If no bingo package is purchased, this will be the maximum amount which can be deposited.

5.5. Any funds remaining in the Class II Mobile Wagering Account must be cashed out at the end of the session/day.

5.5.1. The Gaming Operation shall set the amount of time funds are valid before forfeiture.

5.5.2. Purchase~~d/~~deposit tickets must be presented to cash out.

5.6. Additional documentation requirements for Class II Mobile Wagering Accounts shall include the following:

5.6.1. Provide the patron with purchase/deposit receipt/ticket, which shall include, but are not limited to , the following:

a. Patron name

b. Player tracking card number

c. Date/time of transaction

d. Session the receipt/ticket is good for

e. Amount of the transaction

f. Bingo package purchased if a package was purchased

g. Security code and personal identification number (PIN) to activate a player interface or personal handheld device (PHD), if used

5.7. Information shall be available for patron review at each area where transactions may be processed stating, but not limited to, the following, as applicable:

5.7.1. The purchase process

5.7.2. Any/all games being offered showing rules and how to play

5.7.3. Unclaimed funds process (i.e. forfeit XX hours after close of session)

5.7.4. That any credit or debit card transaction will be treated by the authorizing bank as a cash advance, and that fees from the transaction may apply.

5.7.5. Any holds or restrictions that may be placed by the authorizing bank on the amount being charged/debited.

5.7.6. The charge amount will be for the transaction only, there will be no cash back from a credit/debit sale.

6. Class II Mobile Gaming Equipment Requirements

6.1. The mechanism used to verify that the mobile communications device is being operated by an authorized person shall be capable of being initiated both on demand and on a regular basis.

6.2. Class II Gaming Systems shall be able to recall the last twenty-five (25) wagering account transactions received from the host system and the last twenty-five (25) wagering account transactions transmitted to the host system in order to support an adequate audit trail. The following information shall be displayed:

6.2.1. The type of transaction

6.2.2. The transaction value

6.2.3. The time and date of the transaction

6.2.4. The patron’s account number or a unique transaction number

6.3. Mobile Gaming Devices and the Class II Gaming System shall have electronic accounting meters which are at least ten (10) digits in length and shall show the following information:

6.3.1. Electronic credits/cashable credits received from the central system/wagering account

6.3.2. Electronic credits/cashable credits transmitted to the central system/wagering account

6.4. Current account balance information shall be available on demand from the mobile device after confirmation of patron identity.

6.5. The mobile gaming device and central system shall be capable of providing confirmation/denial of every cashless/electronic transaction initiated.

6.5.1. The confirmation/denial shall include the following:

a. The type of transaction (upload/download)

b. The transaction value

c. The time and date

d. The patron's account number or unique transaction number

e. If denied, a message showing why the transaction was denied

6.5.2. If a patron initiates a cashless transaction which exceeds game configured limits, credit limit, etc., the transaction may only be processed if the patron is clearly notified that he/she has received or deposited less than requested, to avoid patron disputes.

6.6. The Gaming Operation shall develop a system of internal controls to address error conditions.

6.6.1. For the host system, the following conditions shall be monitored and a message displayed to the patron for the following:

a. Invalid PIN or player ID (prompt for re-entry up to 5 times)

b. Account unknown

6.6.2. For gaming devices, for a situation in which there are any credits on the gaming device that are attempted to be transferred to the host system that result in a communication failure where this is the only payout medium (no hopper/ticket printer), the situation shall result in a hand-pay lockup or tilt condition on the device.

History.

Approved by the Gaming Regulatory Authority Board on July 23, 2026 with an effective date of September 21, 2026.