

SECTION 13
DROP AND COUNT

13.1 General Standards

A. Drop and Count Schedule

1. All (active and in-active) casino instrument storage containers shall be removed only at the time previously designated by the casino operation and reported to the CNGC, except for emergency drops.
2. The schedule delineating the drop and count times for casino instrument storage containers shall be submitted and filed with the Cherokee Nation Gaming Commission (CNGC) and surveillance, which shall include drop routes.
3. Any changes made to the established schedule and/or routes must be made at least seventy-two (72) hours in advance, in writing, prior to the initiation of any changes.
4. For any unscheduled deviations from the established schedule in excess of thirty (30) minutes, the gaming operation shall submit a Drop/Count Time Deviation Form to the CNGC within twenty-four (24) hours.

B. Security Over the Drop and Count

1. Security shall be provided over the casino instrument storage containers at all times during the drop process.
2. Security shall contact surveillance prior to commencing

the drop and/or count process so that surveillance may monitor the activities (the process begins when the first casino instrument storage container is removed). For Tier A casino operations, if surveillance operations are unmanned, security shall log the date, time, each process begins.

C. Surveillance of the Drop and Count

1. Tier A casino operations may be exempt from certain standards pertaining to manned surveillance operations.
2. Surveillance must be notified when the drop and count begins and shall record the date, time, and corresponding process in the surveillance activity log.
3. Surveillance must be notified whenever count room personnel exit or enter the count room during the count and log the occurrence. If at any time during the count, fewer than two (2) persons for Tier A and B and three (3) persons for Tier C operations, are left in the count room during the count process (prior to the drop proceeds being accepted into cage/vault accountability), surveillance must immediately notify security and the CNGC.
4. The count process shall be monitored and recorded, both audibly and visually, in its entirety by surveillance, with a degree of clarity sufficient to facilitate an investigation. For

SECTION 13
DROP AND COUNT

Tier A casino operations with unmanned surveillance, the video recording and/or digital record must be viewed by an employee independent of the count process within seven (7) days.

D. Access to Count Room and/or Man Trap

1. The count room and related man trap areas are considered highly restricted.
2. Access to the count room/man trap is restricted to members of the drop and count teams, authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.
3. Persons authorized to enter the count room without escort must be listed by title. The casino operation is responsible for updating and providing the list to the CNGC every thirty (30) days. The monthly report shall consist of no less than the title of authorized persons and a statement indicating any changes or no changes from the previous report which was submitted to the CNGC.
4. Any person entering the count room without specific authorization/access, must be escorted by security and sign an entry access log that designates the date/time, duration, and purpose of the visit.

5. Access to stored (both empty and full) casino instrument storage containers must be restricted to authorized members of the drop and count teams.
6. All coin, tokens, chips, currency, and/or cash equivalents stored in the count room shall be secured from unauthorized access at all times.

E. Extraneous Items and Count Room Standards

1. Drop and count employees are strictly prohibited from having any extraneous items (e.g. personal belongings, tool boxes, beverage containers, etc.) in their possession during the drop process or in the count room, unless otherwise approved by the CNGC.
2. Food and drinks are prohibited within the count room at all times.
3. The count room must 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 this highly restricted area are prohibited.
4. Trash cans and trash bags shall be clear or mesh so as not to obstruct the view of surveillance.

SECTION 13
DROP AND COUNT

5. Table top and work surfaces shall be clear.
6. All drop and count employees will be dressed in pocketless jumpsuits or similar attire as approved by the CNGC.

13.2 Drop Standards

Controls must be established and procedures implemented to ensure the security of the drop process and the related transfer of funds stored in casino instrument storage containers, to and from the count room or other equivalently secured area.

A. Drop Team

1. Security must observe and guard the removal of the casino instrument storage container and subsequent transportation to the count room. At no time shall security handle any unsecured funds.
2. Security must be present at all times during the drop process.
3. In addition, a minimum of two (2) employees shall be involved in the removal and transportation of casino instrument storage containers, at least one of whom is independent of the revenue center/department funds being dropped.

B. Each defined drop process must be continuous from start to finish.

C. All casino instrument storage containers shall be exchanged with

another (empty) storage container during the course of the drop procedure. If the storage container cannot be exchanged due to malfunction or other reason, the drop team must record the permanent asset number and document the reason for not including the asset in the drop process.

D. Casino instrument storage containers must be transported through the utilization of a transportation cart that shall be equipped with a locking mechanism to prevent access to the funds at times other than the drop and count. Emergency drop/partial drop proceed transfers may be exempt from this standard.

E. All casino instrument storage containers must be posted with a number that will correspond to a permanent number on the game/asset/kiosk designating the source of the funds.

F. Upon removal, casino instrument storage containers must be transported directly to the count room or other equivalently secure area with comparable control and locked in a secure manner until the count takes place.

13.3 Count Standards

Controls must be established and procedures implemented to ensure the security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud.

A. Count Team

SECTION 13
DROP AND COUNT

1. For instances in which the number of count team members refer to three (3) employees, Tier A and B casino operations may utilize two (2) employees as provided for in the casino operation's SICS.
 2. For Tier C casino operations, all counts must be performed by a minimum of three (3) employees and no fewer than three (3) employees may be in the count room until the drop proceeds have been accepted into cage/vault accountability.
 3. Count room personnel are not allowed to exit or enter the count room during the count except for emergencies or scheduled breaks. Surveillance must be notified of each time.
 4. Count team members must be rotated on a routine basis such that the count team is not consistently the same three (3) persons more than four (4) days per week. This standard shall not apply to casino operations that utilize more than three persons on the count team.
 5. Functions performed by the count team members must be rotated on a routine basis.
 6. The count team members must be independent of the drop proceeds/revenue center being counted and the cage/vault department. An accounting representative may be used if there is an independent audit of the count room documentation.
- B. The casino instrument storage container count must be performed in a designated count room or other equivalently secure area with comparable controls, as approved by the CNGC.
 - C. Immediately prior to the count (before the first count begins) at least two (2) count team members must verify the accuracy of the currency counter with previously counted currency for each denomination (i.e., test currency). The test currency is counted by the currency counter to ensure that the counter is functioning properly. The test results shall be documented and maintained.
 - a. The currency counter test must be performed with test currency rather than with currency from a casino instrument storage container.
 - b. If the same currency counter is used for one revenue center (e.g., gaming or non-gaming revenue center) and then immediately used for a second revenue center, performing the currency counter test once will satisfy the standard provided that the same count team members complete one count and then proceed to the other revenue center count.
 - D. If counts from various revenue centers and/or kiosks occur simultaneously in the count room,

SECTION 13
DROP AND COUNT

procedures shall be in effect that prevent the commingling of funds.

E. Casino instrument storage containers must be emptied and counted in such a manner as to prevent the commingling of funds between containers until the contents have been recorded. The count of each container shall adhere to the following:

1. The count of each casino instrument storage container must be recorded in ink or other permanent form of recordation.
2. For counts that do not utilize a currency counter, a second count must be performed by a member of the count team who did not perform the initial count. Separate counts of chips and tokens must always be performed by members of the count team.
3. Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the count team member or accounting personnel. All single-use coupons must be cancelled daily by an authorized employee to prevent improper circulation.
4. Procedures must be implemented to ensure that any corrections to the count documentation are permanent and identifiable, and that the original corrected information remains legible. Corrections must be verified by two (2) count team members.

5. If currency counters are utilized, a count team member must observe the loading and unloading of all currency at the currency counter, including rejected currency.

6. Two counts of the currency rejected by the currency counter must be recorded per casino instrument storage container, as well as in total. Rejected currency must be posted to the casino instrument storage container from which it was collected.

7. Each casino instrument storage container, when empty, must be shown to another count team member or to surveillance, provided that the count is monitored in its entirety.

F. For drop proceeds from table games, the following standards shall apply:

1. Orders for fill/credit (if applicable) must be matched to the fill/credit slips. Fills and credits shall be traced to or recorded on the count sheet.

2. The opening/closing table inventory forms must be either:

a. Examined and traced to or recorded on the count sheet; or

b. If a computerized system is used, accounting personnel can trace the opening/closing table inventory forms to the

SECTION 13
DROP AND COUNT

count sheet.
Discrepancies must be investigated with the findings documented and maintained for inspection.

- G. The count sheet must be reconciled to the total drop by a count team member who may not function as the sole recorder, and variances shall be reconciled and documented. This standard does not apply to cash-out tickets removed from casino instrument storage containers.
- H. All members of the count team must sign the count document or a summary report to attest to their participation in the count.
- I. A final verification of the total drop proceeds, before transfer to the cage/vault must include the following:
 - 1. Final verification must be performed by at least two (2) count team members, one of whom must be a supervisor.
 - 2. Final verification must include a comparison of currency counted totals against the currency counter system/system report (not the report generated by the gaming system or kiosk), if any computer/system is used.
 - 3. This verification does not require a complete recount of the drop proceeds, but does require a review sufficient to verify the total drop proceeds being transferred.

4. The two (2) count team members must sign the report attesting to the accuracy of the total drop proceeds verified.

- J. All drop proceeds must be transferred to the cage/vault in accordance with the following standards:
 - 1. All drop proceeds and cash equivalents that were counted must be submitted to the cage or vault employee (who must be independent of the count team) or to an authorized employee independent of the revenue generation source and the count process for verification. Such person must certify, by signature, the amount of the drop proceeds being delivered and received. Any unresolved variances shall be reconciled, documented, and/or investigated by accounting/revenue audit.
 - 2. After verification by the cage/vault employee receiving the funds, the drop proceeds must be transferred to the cage/vault.
 - 3. The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
 - 4. The cage/vault employee performing the verification count shall be precluded from having prior knowledge of the results of previous counts performed by the count team.

SECTION 13
DROP AND COUNT

5. All cage/vault records must be forwarded to accounting or secured and accessible by only the accounting/revenue audit department.
 6. The cage/vault employee receiving the transferred drop proceeds must sign the count sheet (or other reconciling document) attesting to the verification of the total received, and thereby assuming accountability of the currency drop proceeds, ending the count.
 7. Any unresolved variances between total drop proceeds recorded on the count room report and the cage/vault final verification during the transfer must be documented and investigated.
- K. The count team must not have access to the reconciliation report (i.e. bill-in meter reports, kiosks reconciliation reports, etc.) amounts until after the count is completed and the drop proceeds are accepted into cage/vault accountability.
- L. The count sheet, with all supporting documents, shall be promptly delivered to the accounting department by a count team member or someone other than the cashiers department. Alternatively, it may be adequately secured (e.g., locked container to which only accounting personnel can gain access) until retrieved by the accounting department.

13.4 Equipment

Equipment utilized for the casino instrument storage containers drop and count shall comply as follows:

- A. Currency counters and any related hardware, software, and system interfaces must be approved by the CNGC prior to use in the count room.
- B. If a currency counter interface is used:
 1. It shall be adequately restricted (e.g., password, keys, etc.) so as to prevent unauthorized access.
 2. The currency drop figures shall be transferred via direct communications line or computer storage media to the accounting department.
 3. Unannounced currency counter and currency counter interface (if applicable) tests shall be performed by personnel independent of the cage, vault, count team, and/or applicable gaming departments on at least a quarterly basis with the test results documented and maintained.
 - a. All denominations of currency counted by the currency counter must be tested.
 - b. The results of these tests shall be documented and signed by the person or persons performing the test.

SECTION 13
DROP AND COUNT

C. Casino Instrument Storage Containers

1. Access to casino instrument storage containers must be restricted to authorized persons.
2. A unique asset tracking number shall be assigned to each bill acceptor and drop box for inventory tracking purposes.
3. A perpetual inventory shall be maintained for tracking all casino instrument storage containers which shall be verified on at least a quarterly basis that shall indicate the status (e.g. active, inactive, out of service), custodial department, and location.
4. Casino instrument storage containers must be inspected on a monthly basis with any necessary maintenance identified at that time.
5. Casino instrument storage containers must be thoroughly emptied and reviewed by management and surveillance before taken off-site for any outside maintenance.

D. Other Equipment

1. Transportation Carts
 - a. All transportation carts shall be equipped with a locking mechanism to prevent access to the funds at times other than the drop and count.

- b. Locking mechanism shall be inspected on a monthly basis with any necessary maintenance identified at that time.

2. [Reserved].

13.5 Emergency Drop Procedures

Emergency drop procedures shall be developed by the casino operation as approved by the CNGC. Such procedures shall be maintained and documented in the appendix of this document, including all modifications and amendments.