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CHEROKEE NATION GAMING COMMISSION

ADMINISTRATIVE PROCEDURES ACT POSTING

TITLE: Proposed Revisions to the Cherokee Nation Gaming Commission Tribal Internal Control Standards; Addition of Two (2) New Regulations.

TYPE OF ACTION: Notice of Proposed Rule

PROPOSED RULES:

Chapter VII – G – Craps & Mini-Craps (New)

Chapter VII – H – Roulette (New)

Section 8 – Table Games (certain standards revised)

Section 22 – Surveillance (certain standards revised)

PUBLICATION DATE: 30 April 2018

SUMMARY:

The purpose of the attached proposed rules is to amend the current Cherokee Nation Gaming Commission Tribal Internal Control Standards and to adopt two (2) new regulations concerning the games of “Craps” and “Roulette.”

AUTHORITY:

The Cherokee Nation Gaming Commission is authorized to promulgate regulations under the authority of Title 4, Section 22 of the Cherokee Nation Code Annotated.

REGULATORY ANALYSIS:

No regulatory analysis of the revised rule was performed.

COMMENT PERIOD:

Written comments must be received on or before 5 p.m., Thursday, 30 May 2018.

SUPPLEMENTARY INFORMATION:

Comments may be submitted electronically at gaming-commission@cherokee.org. Written comments may be sent to the Cherokee Nation Gaming Commission, P. O. Box 627, Tahlequah, OK 74465 and must be postmarked by the date above.

A copy of the current Cherokee Nation Gaming Commission Tribal Internal Control Standards may be obtained by submitting a request electronically or in writing using the above addresses.

The National Indian Gaming Commission Minimum Internal Control Standards may be accessed by visiting www.nigc.gov/general-counsel/commission-regulations.

The Tribal-State Compact may be accessed by visiting the State Compliance Agency website at [www.ok.gov/OSF/Tribal Gaming](http://www.ok.gov/OSF/Tribal_Gaming).

A copy of Oklahoma House Bill 3375 may be accessed by visiting the LegiScan website at <https://legiscan.com/OK/bill/HB3375/2018>

PUBLIC HEARING:

Persons requesting public hearings or submitting comments must include their name, address, phone number, and e-mail address, if the submission is electronic, but may request this identifying information be kept confidential. Anonymous comments will not be accepted.

A request for a public meeting shall not end before fifteen- (15) days following the public notice of all responses to written comments. A request for a public meeting shall include a statement of the issues desired to be discussed and a summary of the argument supporting the person's position on the issues. A public hearing on a rule proposed to be adopted may not be held earlier than twenty- (20) days after notice of its location and time is published on the website.

Public hearings may be held only from 8:00 A.M. to 10:00 P.M. on Monday thru Saturday. The public hearing shall be recorded by audio, audio and video, stenographic or other means.

Persons requesting an opportunity to comment at a public meeting may be required to register by name and indicate whether they support or oppose the rule or a part of the rule.

BACKGROUND:

The Indian Gaming Regulatory Act (IGRA) was enacted by the United States Congress on 17 October 1988, establishing the National Indian Gaming Commission (NIGC). Under the IGRA, the NIGC is charged with regulating Class II gaming and certain aspects of Class III gaming.

The NIGC adopted certain regulations in Chapter III of Title 25, Code of Federal Regulations (Parts 500-599), to provide purpose and scope, procedures for service of NIGC determinations, requirements for submitting new and existing gaming ordinances to the Chairman for approval, requirements for background investigations on Primary Management Officials and Key Employees, and requirements for licensing employees of Indian gaming operations.

The Cherokee Nation adopted Legislative Act 30-89 on 8 April 1989 establishing the Cherokee Nation Gaming Commission (CNGC) to regulate the conduct of gaming owned and operated by the Cherokee Nation. The Act was amended several times with the last revision being passed by the Tribal Council in July 2014 and approved by the National Indian Gaming Commission (NIGC) in October 2014.

Citing the need for effective controls in Indian gaming operations, the NIGC promulgated the Minimum Internal Control Standards (MICS; codified in Section 25 CFR §542) in January 1999 that govern the conduct of most daily activities within a tribal gaming operation. Tribes were expected to use the MICS, as amended, in developing their own Tribal Internal Control Standards (TICS), which were required to meet or exceed those standards established by the NIGC. Tribal gaming operations were, in turn, expected to use the TICS to create and implement a System of Internal Control Standards (SICS) by which the gaming operation would achieve regulatory compliance with Tribal and Federal regulations.

The Cherokee Nation entered into a gaming compact with the State of Oklahoma in 2005. Part 5 (B) of the compact requires “all enterprises and facilities shall comply with tribal internal control standards that provide a level of control that equals or exceeds those set forth in the National Indian Gaming Commission’s Minimum Internal Control Standards (25 C.F.R., Part 542).”

The Compact also states in Part 5 (A) “(t)he tribe shall promulgate any rules and regulations necessary to implement this Compact.”

On 10 April 2018, the Governor of Oklahoma signed into law HB 3375, authorizing non-house banked table games and removing the prohibition of roulette wheels as well as dice games; these games currently operate using playing cards. The Cherokee Nation Gaming Commission seeks to modify the Tribal Internal Control Standards to provide for the use and control of the new physical elements of the games of roulette and craps.

The Cherokee Nation Gaming Commission also seeks to add two (2) regulations – Chapter VII – G – Craps & Mini-Craps and Chapter VII – H – Roulette – that provide requirements necessary for protecting game integrity and fairness.



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CHEROKEE NATION GAMING COMMISSION
RULES AND REGULATIONS

CHAPTER:	Authorization of Gaming Activity	CHAPTER #:	VII
SUBJECT:	Craps & Mini-Craps	SECTION – SUBSECTION:	G
EFFECTIVE DATE:	mm/dd/yyyy	SUPERSEDES MATERIAL DATED:	
APPROVED BY:		DATE:	

PURPOSE

The purpose of this Chapter is to implement relevant provisions of the Indian Gaming Regulatory Act (IGRA) (25 U.S.C. § 2706, 2710 and 2712), the National Indian Gaming Commission (NIGC) regulations, the Cherokee Nation Code Annotated Title 4 (Gaming Ordinance), the Tribal-State Compact, and other applicable laws and regulations relating to the role and responsibility of Cherokee Nation Gaming Commission (CNGC) to regulate gaming systems, components, and devices within the jurisdiction of CNGC.

SCOPE

This Section shall cover the play of the game “Craps,” and any variations thereof, and any instruments used in connection therewith, as approved by the CNGC.

AUTHORITY

Title 4 § 22 CNCA
Tribal-State Compact Part 5 (A)
Tribal-State Compact Part 5 (G)

A. DEFINITIONS

1. *Enterprise* – The entity conducting gaming operations on behalf of or as authorized by the Cherokee Nation.
2. *Boxperson* – The first level supervisor assigned the responsibility of directly participating in and supervising the operation and conduct of the Craps game.
3. *Cherokee Nation Gaming Commission (CNGC)* – The regulatory body established by the Cherokee Nation to oversee and regulate the conduct of gaming on lands owned by the Cherokee Nation.

4. *Compact Game* – An electronic and/or card/table game authorized under the model compact and as described in O.S. Title 3A.
5. *System of Internal Controls (SICS)* – An overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures and standard practices based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of a gaming operation and protect its assets from unauthorized access, misappropriation, forgery, theft, or fraud.

B. GAME RULES AND PAYOUT ODDS

1. The Enterprise shall prepare and submit game rules, internal controls, and policies and procedures for the game of Craps, and any variations thereof, including Mini-Craps, to the CNGC for review and approval.
2. A proposed table games felt for Craps, Mini-Craps, or any variations thereof, that corresponds to the approved game rules for said game must be submitted to the CNGC for review and approval.
3. The Enterprise shall post the payout odds on the table felts and with the printed game play rules pamphlet for each game offered, which shall be kept in or near the pit.
4. The Enterprise may offer a player true odds on those bets in return for the player paying to the Enterprise, at the time of making the bet, a percentage of the amount wagered which in no event shall exceed five percent (5%) of such wager. Notwithstanding the foregoing, the Enterprise may collect the percentage of the amount wagered only on winning bets. No other percentage, fee, or Vigorish may be charged to a player in making any wager in the game of Craps, Mini-Craps, or any other approved variation.
5. No changes to game rules, table games felts, or payout odds may be made without prior approval from the CNGC.

C. CRAPS AND MINI-CRAPS TABLES; PHYSICAL CHARACTERISTICS

1. A Craps table may not be larger than 14 feet in length.
2. A Mini-Craps table may not be longer than 9½ feet in length and have seating locations for a maximum of nine (9) players.
3. The layout for Craps and Mini-Craps tables shall be submitted to the CNGC for review and approval and must contain, at a minimum:
 - a. The name or logo of the gaming facility in which the game is played;

- b. Specific areas designated for the placement of wagers authorized in accordance with the game rules;
 - c. The words “no call bets;”
 - d. For the Fire Bet game version:
 - i. No more than 16 areas designated for the placement of Fire Bets. The Fire Bet areas must be located around the perimeter of the layout, corresponding to player positions at the table, and sequentially numbered in a clockwise direction, with the area numbered 1 being located immediately to the left of the Boxperson or Dealer.
 - ii. A designated area of the layout for the relocation and identification of all Fire Bets placed by players prior to the come out roll of a shooter. The designated area must be located in front of the Boxperson and contain numbered areas which correspond to the location of the numbered areas described in subparagraph (i) above.
 - iii. The following information must be visible to all players;
 - a. The payout odds for four, five, and six different unique points made;
 - b. Fire Bets shall be accepted only prior to a shooter’s initial come out roll;
 - c. The wager limitations applicable to the Fire Bet.
 - e. If Bonus Craps is offered:
 - i. A designated area of the layout in front of the Boxperson for the placement of the following wagers:
 - a. The All Small Wager
 - b. The All or Nothing At All Wager
 - c. The all Tall Wager
 - ii. A designated area of the layout for the placement of a marker button on numbers 2 through 6 and numbers 8 through 12.
 - iii. The payout odds for permissible Bonus Craps Wagers.
4. Each Craps and Mini-Craps table must have a drop box and tip box attached to the table in locations approved by the CNGC.

D. DICE – PHYSICAL CHARACTERISTICS

1. Except as otherwise provided by the CNGC, each die used in gaming shall:
 - a. Be formed in the shape of a perfect cube and of a size no smaller than .750 of an inch on each side nor any larger than 0.775 of an inch on each side with an acceptable tolerance of +/- .005 (five ten-thousandths) inch, as measured by a micrometer;
 - b. Be transparent and made exclusively of cellulose except for the spots, name or trade name of the casino and serial numbers or letters contained thereon;
 - c. Have the surface of each of its sides perfectly flat and the spots contained in each side perfectly flush with the area surrounding them;
 - d. Have all edges and corners perfectly square and forming perfect 90-degree angles;
 - e. Have the texture and finish of each side exactly identical to the texture and finish of all other sides;
 - f. Have its weight equally distributed throughout the cube and no side of the cube heavier or lighter than any other side of the cube;
 - g. Have its six side bearing white circular spots from one to six respectively with the diameter of each spot equal to the diameter of every other spot on the die;
 - h. Have spots arranged so that the spots on opposite sides of the die will always add up to seven (7); each spot shall be placed on the die by drilling into the surface of the cube and filling the drilled out portion with a compound which is equal in weight to the weight of the cellulose drilled out and which forms a permanent bond with the cellulose cube;
 - i. Have imprinted or impressed thereon the name or trade name of the casino licensee in which the die is being used.
2. In order to be considered for approval, gaming management must supply the following:
 - a. Written specifications for the proposed dice;
 - b. The name and address of the manufacturer. Said manufacturer must be a licensed and bonded vendor prior to ordering;
 - c. Verification upon oath, notarized affirmation, executed by the chief operating officer of the manufacturer, or a person with equivalent responsibilities, that it has a written system of internal controls, which describes in detail the current administrative, accounting and security procedures which are utilized in the manufacture, storage,

- and shipment of the dice and any related materials. The written system must include, at a minimum, a detailed narrative description of the procedures and controls implemented to insure the integrity and security of the manufacturing process, from design through shipment, including but not limited to those procedures and controls designed specifically to:
- i. Provide for the secure storage or destruction of all pre-production prototypes, samples, production rejects and other products;
 - ii. Provide security over the items used in the manufacturing process;
 - iii. Prevent the unauthorized removal of product from the production facility through the utilization of security devices;
 - iv. Restrict access to raw materials, work in process, and finished goods inventories to authorized personnel.
 - v. Provide such other or additional information as the Commission may require.
- d. The Commission may in writing approve variations from the specific requirements of this regulation if, in the opinion of the Commission, the alternative controls and procedures meet the objectives of this regulation.
3. If, after receiving and reviewing the items and information described by this regulation, the Commission is satisfied that the proposed dice conform to the requirements of this regulation, the Commission shall notify the licensee or the manufacturer authorized by the licensee to produce the dice in writing and shall request, and the licensee or the manufacturer shall provide a sample of the proposed dice in final, manufactured form. If the Commission is satisfied that the sample conforms with the requirements of this regulation and the information submitted with the licensee's application, the Commission shall approve the proposed dice and notify the licensee in writing. The Commission may retain the sample dice submitted pursuant to this subsection.
4. Before new dice can be put into use in the casino they must be counted and inspected by management and witnessed and verified by a Gaming Commission representative. Copies of all order, shipping, and inventory documents must be provided to the Commission as they become available.

E. DICE – RECEIPT AND STORAGE

1. When boxes of dice are received for use in the casino from the licensed manufacturer or licensed distributor thereof, a CNGC representative and at least two (2) individuals, one of whom must be from the Security department and one from either the accounting or gaming department, shall inspect the dice shipment looking for evidence of tampering or damaged. If no tampering or damage is apparent, the individual packages of dice shall each be inspected to ensure the dice meet the specifications outlined in this document.
 - a. In the event of a shipment or a portion thereof is damaged, the Enterprise shall return the shipment or the damaged portion to the vendor. Any portion of a shipment that is not returned to the vendor shall be processed in accordance with section b below.
 - b. If no damage to the shipment is found, the individuals above shall record on an inventory log, as required in number 2 below, the number of dice to be placed into inventory. The individuals shall place received dice in a locked cabinet inside a secure storage area as approved by the CNGC.
2. Gaming management shall maintain a log to account for dice in accordance with the procedures contained in the casino's SICS. The SICS shall require the following:
 - a. A dice inventory system, which shall include, at a minimum, the recordation of the following:
 - i. Balance of dice on hand and their location;
 - ii. Dice received from the vendor;
 - iii. Dice removed from storage;
 - iv. Dice returned from storage;
 - v. Date of:
 - a. Receipt from vendor;
 - b. Removal from storage;
 - c. Return to storage;
 - d. Physical inventory of dice;
 - vi. Signatures of the casino security and accounting and/or gaming department representatives participating in the transaction.
 - b. All approved storage areas and pit stands used to store dice for more than one gaming day shall have two (2) separate locks. The casino security department shall be responsible for one key and the table games department shall be responsible for the

- second key; provided, however, that no person other than table games department management shall have access to the table games department key.
- c. When removing dice from the primary storage area, table games department management, in the presence of a security officer, shall remove the appropriate number of dice.
3. A physical inventory of all dice must be performed at least once per month.
 - a. The inventory must be performed by individuals with no incompatible functions and shall be verified to the balance of dice on hand as required in subsection (a) above.
 - b. Any discrepancies must be immediately reported to gaming management and the CNGC.

F. DICE – INSPECTION AND REMOVAL FROM USE

1. All envelopes and containers used in this section for dice pre-inspected at the pit stand or in a primary storage area and for those collected by the Security department must be transparent. The envelopes or containers and the method used to seal them shall be designed or constructed so that any tampering shall be evident.
2. All dice shall be inspected and distributed to the gaming tables in accordance with one of the following acceptable alternatives:
 - a. Alternative No. 1: Distribution to and inspection at Craps or Mini-Craps tables shall be as follows:
 - i. The table games shift manager or table games supervisor thereof and the casino security officer who removed the dice from the primary storage area shall distribute sufficient dice directly to the table games supervisor in each pit, or place them in a locked compartment in the pit stand, the keys to which shall be in the possession of the table games supervisor or a supervisor thereof;
 - ii. Immediately upon opening a table for gaming, the table games supervisor shall distribute a set of dice to the table. At the time of receipt, a Boxperson at each Craps table and the Floorperson at each Mini-Craps table, in order to ensure that the dice are in a condition to assure fair play and otherwise conform to the rules of the CNGC, shall, in the presence of the Dealer, inspect the dice given to him or her with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept in a compartment at each Craps table or pit stand and shall be at all times readily available for use by the CNGC;
 - a. Following the inspection above:

- (i) For Craps, the Boxpersion shall, in the presence of the Dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended;
 - (ii) For Mini-Craps, the Floorperson shall, in the presence of the Dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table, they shall never be left unattended;
 - iii. The table games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the table games supervisor or a supervisor thereof. No dice taken from this reserve shall be used for actual gaming until and unless inspected in accordance with (a)(ii) above.
- b. Alternative No. 2: Distribution to and inspection at the pit stand shall be as follows:
- i. The table games shift manager or supervisor thereof and the casino security officer who removed the dice from the primary storage area shall distribute the dice directly to the appropriate person as identified in sub-section (ii) below, who will perform the inspection in each pit.
 - ii. The inspection of the dice at the pit stand shall be performed by a Boxpersion or Floorperson in the presence of another Boxpersion or Floorperson, both of whom are assigned the responsibility of supervising the operation and conduct of a Craps game.
 - iii. To ensure that the dice are in a condition to assure fair play and otherwise conform to the rules of the CNGC, the dice shall be inspected with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet, which instruments shall be kept at the pit stand and shall be at all times readily available for use by the CNGC. The inspection shall be performed on a flat surface, which allows the dice inspection to be observed through closed circuit television cameras and by any persons in the immediate vicinity of the pit stand.
 - iv. After completion of the inspection, the Boxpersion or Floorperson who inspected the dice shall, in the presence of the other Boxpersion or Floorperson who observed the inspection, shall distribute such dice to the Boxpersion assigned at each Craps table or to the Floorperson assigned at each Mini-Craps table. The Craps Boxpersion or the Mini-Craps Floorperson shall, in the presence of the Dealer, place the dice in a cup on the table for use in gaming, and while the dice are at the table they shall never be left unattended;
 - v. The table games supervisor shall place extra sets of dice for dice reserve in the pit stand, as follows:

- (i) Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the table games supervisor or a supervisor thereof.
 - (ii) Except as otherwise provided in sub-sections vi and vii below, all dice taken from the reserve shall be re-inspected by a table games supervisor in the presence of another table games supervisor in accordance with the inspection procedures set forth in sub-sections ii and iii above, prior to their use for actual gaming.
 - vi. In accordance with v(ii) above, previously inspected reserve dice may be used for gaming without being re-inspected, if they are maintained in a locked compartment in the pit stand, the key for which shall be in the possession of the table games supervisor or table games supervisor thereof.
 - vii. In accordance with v(ii) above and as an additional alternative to vi above, previously inspected reserve dice may be used for gaming without being re-inspected, if a set of at least five dice are in a sealed envelope or container and are placed a locked compartment in the pit stand. A label that identifies the date of inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container.
- c. Alternative No. 3: Inspection in primary storage area and distribution to tables shall be as follows:
 - i. Inspection of dice for all table games in an approved primary storage area shall be performed by a table games supervisor and a table games shift manager, in the presence of a casino security officer and under surveillance coverage; notice to surveillance shall be given prior to inspection.
 - ii. The dice shall be inspected with a micrometer or any other approved instrument that performs the same function, a balancing caliper, a steel set square, and a magnet to ensure that the dice are in a condition to assure fair play and otherwise conform to the rules of the CNGC. These instruments shall be maintained in the storage area and shall be at all times readily available for use by the CNGC.
 - iii. After each set of at least five dice are inspected, they shall be placed in a sealed envelope or container; provided, however, that reserve dice may be placed in individual sealed envelopes or containers. A label that identifies the date of the inspection and contains the signatures of those responsible for the inspection shall be attached to each envelope or container;
 - iv. At the beginning of each gaming day and at such other times as may be necessary, a table games shift manager or table games supervisor thereof and a casino security officer shall distribute dice to the table games supervisor in each Craps or Mini-Craps pit or place the dice in a locked compartment in the pit stand. When

the sealed dice are distributed to the Craps or Mini-Craps table, a Boyperson at each Craps table or a Floorperson at each Mini-Craps table, after assuring the seals are intact and free from tampering, shall open the sealed envelope or container, in the presence of the Dealer, and place the dice in a cup on the table for use in gaming. While dice are on the table, they shall never be left unattended.

- v. When the envelope or container or the seal is damaged, broken, or shows indication of tampering, the dice shall not be used for gaming activity unless the dice are re-inspected in accordance with the procedures in sub-sections (a) or (b) above.
 - vi. The table games supervisor shall place extra dice for dice reserve in the pit stand. Dice in the pit stand shall be placed in a locked compartment, the key to which shall be in the possession of the Table games manager or supervisor thereof.
 - vii. Any primary storage area in which dice are inspected in accordance with this paragraph, shall be equipped with closed circuit television camera coverage capable of observing the entire inspection procedure.
3. The casino licensee shall remove any dice at any time of the gaming day if there is any indication of tampering, flaws, or other defects that might affect the integrity or fairness of the game or at the request of the CNGC.
 4. The Dealer or Stickperson must notify the Boyperson and/or floor supervisor of any damaged, flawed, marked, or suspicious appearing dice, so that the supervisor can determine the appropriate course of action.
 5. At the end of each gaming day or at such other times as may be necessary, the table games supervisor identified in sub-section (b) below shall visually inspect each die for evidence of tampering. Such evidence discovered at this time or at any other time shall be immediately reported to the security department and the CNGC. A security department member shall complete a two-part Discrepancy Report (Report) comprised of an original and duplicate, which along with the evidence, shall be retrieved by an agent of the CNGC. The original and duplicate shall contain at a minimum:
 - a. Date and shift of inspection;
 - b. Name of table games supervisor conducting the inspection. The inspection required by this subsection shall be performed by a table games supervisor other than the one who originally inspected the dice;
 - c. Pit number, table number, and type of game;
 - d. Description (for example, shaved corners);

- e. Signature of table games supervisor conducting the inspection;
 - f. Signature of casino security representative taking custody of the die; and
 - g. The signature of the agent of the CNGC inspecting or accepting the die. The CNGC agent shall retain the original and return the duplicate to the security department. A receipt shall be issued to the agent of the CNGC for any die retained by the CNGC. The receipt shall be signed by the security representative releasing the die to the CNGC and the agent of the CNGC accepting the die. The receipt shall be retained with the security department copy of the Report. Any die not retained by the CNGC shall be destroyed in accordance with the licensee's destruction procedures.
6. Any dice showing evidence of tampering shall be placed in a sealed envelope or container.
 - a. A label shall be attached to each envelope or container, which shall identify the table number, date, and time and shall be signed by a person assigned to directly operate and conduct the game at that table and a table games supervisor assigned the responsibility for supervising the operation and conduct of such game.
 - b. The casino security officer taking custody of the dice and delivering the dice to the CNGC shall also sign the label.
 7. All other dice not showing evidence of tampering shall be put into envelopes or containers at this time.
 - a. A label shall be attached to each envelope or container which shall identify the table number, date, and time and shall be signed by the appropriate persons identified in sub-section 5(e) above.
 - b. The envelope or container shall be appropriately sealed and maintained within the pit until collection by a casino security officer.
 8. All extra dice in dice reserve that are to be destroyed or cancelled shall be placed in a sealed envelope or container, with a label attached to each envelope or container that identifies the date and time and is signed by the table games supervisor.
 9. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the casino licensee, and at such other times as may be necessary, a casino security officer shall collect and sign all envelopes or containers of used dice and any dice in dice reserve that are to be destroyed or cancelled and shall transport them to the casino security department for cancellation or destruction. No dice that have been placed in a cup or shaker for use in gaming shall remain on a table for more than 24 hours.

10. At the end of each gaming day or, in the alternative, at least once each gaming day at the same time each day, as designated by the casino licensee and, and at such other times as may be necessary, a table games shift manager or table games supervisor thereof may collect all extra dice in dice reserve.
 - a. If collected, dice shall be returned to the primary storage area; provided, however, that any dice that have not been inspected and sealed pursuant to the requirements in sub-section 2(c) above (Alternative No. 3) shall, prior to use for actual gaming, be inspected in accordance with the requirements in sub-sections 2(a) or 2(b) above; and
 - b. If not collected, all dice in dice reserve must be re-inspected in accordance with sub-sections 2(a), 2(b), or 2(c) above, prior to their use for gaming, except for those dice maintained in a locked compartment pursuant to sub-section 2(b)(v)(i) or 2(c)(vi) above.

G. DICE – CANCELLATION AND DESTRUCTION

1. Other than dice retained for CNGC inspection, dice shall be cancelled or destroyed within 72-hours of collection by the Security department. In addition, once dice retained as evidence by the CNGC are released to the Security department, the dice shall be cancelled or destroyed within 24-hours.
2. The cancellation and destruction process and methods employed by the Enterprise must be approved by the CNGC.
3. Cancellation and destruction of dice shall take place under surveillance coverage in a secure place, the location of which must be approved by the CNGC.

H. INVALID ROLL OF THE DICE

1. A roll of the dice shall be invalid whenever either or both of the dice go off the table or whenever one die comes to rest on top of the other.
2. The persons listed in sub-section (5) below shall have the authority to invalidate a roll of the dice by calling “No Roll” for any of the following reasons:
 - a. The dice do not leave the shooter’s hand simultaneously;
 - b. Either or both of the dice fail to strike an end of the table;
 - c. Either or both of the dice come to rest on the chips constituting the Craps bank of chips;
 - d. Either or both of the dice come to rest in the dice cup in front of the Craps Boxperson, or in front of the Mini-Craps Dealer or Stickperson, or on one of the rails surrounding the table;

- e. When a die or dice are hit by a player in a manner intending to bring it, or them, back into play; provided, when a die or dice bounce off a player, a Dealer/Stickperson, or any object, and bounces back onto the layout it is a valid roll.
 - f. The use of a cheating, crooked, or fixed device or technique in the roll of the dice; and
 - g. For any reason the Craps Boxpersion or Stickperson or the Mini-Craps Dealer or Stickperson, considers the throw to be improper.
3. The call of “No Roll” under either 2(a), (b), or (f) above shall, whenever possible, be made before both dice come to rest.
 4. A throw of the dice which results in the dice coming into contact with any chips on the table, other than the Craps bank of chips, shall not be a cause for a call of “No Roll.”
 5. “No Roll” may be called:
 - a. In Craps, by a Boxpersion or Stickperson, as designated by the Enterprise.
 - b. In Mini-Craps, by the Dealer, Stickperson, or Floorperson, as designated by the Enterprise.

I. POINT THROW; SETTLEMENT OF WAGERS

1. When the dice come to rest from a valid throw, the Craps Stickperson or the Mini-Craps Dealer or Stickperson shall at once call out the sum of the numbers on the high or uppermost sides of the two dice. Only one face on each die shall be considered skyward.
 - a. In the event either or both of the dice do not land flat on the table (for example, one edge of the die is resting cocked on a stack of chips), the side directly opposite the side that is resting on the chips or other object shall be considered uppermost and skyward. If more than one side of a die is resting on a stack of chips or other object, the roll shall be void and the dice shall be re-thrown.
 - b. In the event of a dispute as to which face is uppermost:
 - i. In Craps, the Boxpersion shall have discretion to determine which face is uppermost or to order the throw be void and the dice re-thrown; and
 - ii. In Mini-Craps, the Floorperson shall have discretion to determine which face is uppermost or to order the throw be voice and the dice re-thrown.
2. In Craps, after calling the throw, the Stickperson shall collect the dice and bring them into the center of the table. All wagers decided by that throw shall then be settled,

following which the Stickperson shall pass the dice to the shooter for the next throw. When collecting the dice and passing them to the shooter, the Stickperson shall use a stick designed for that purpose.

3. In Mini-Craps, after calling the throw, the Dealer or Stickperson shall collect the dice and bring them into the center of the table. All wagers decided by that throw shall then be settled, following which the Stickperson shall pass the dice to the shooter for the next throw. When collecting the dice and passing them to the shooter, the Dealer or Stickperson shall use a stick designed for that purpose.
4. Wagers allowed are described in the game rules, which must be approved by the CNGC. Any side wagers between players, players and the Dealer or Stickperson, or observers are prohibited.
5. Verbal wagers, or call bets, are not allowed.
6. Minimum and maximum wagers are to be posted in clear view at or on the table.
7. Any courtesy wagers, or toke bets, must be announced by the Dealer or Stickperson who acknowledges the position of the bet.
8. The Dealer or Stickperson must take down both the wager and the winning payoff on all winning toke bets.
9. Dealers are prohibited from appropriating unclaimed or sleeper money as a toke. All such money is considered Enterprise money unless/until claimed by a player.
10. Toke bets may piggy back on a player's wager with player control. Under player control the wager may stay up after an initial payout.

J. IRREGULARITIES

1. If a player or Dealer error occurs, the table games supervisor may offer the player, at the supervisor's discretion, remedies to correct the error so long as they are not in conflict with approved game rules, internal controls, or table games standard operating procedures.
2. The Boxperson has the authority to overrule the Stickperson if the Boxperson determines an error has been made and so on up through the chain-of-command.
3. Table games management has the authority to handle unspecified irregularities and disputes at their discretion; provided any decision made is in accordance with Enterprise dispute resolution procedures approved by the CNGC.
4. Table games management must notify the CNGC if any player is involved in suspicious activity or if any regulation violation is suspected or verified.



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CHEROKEE NATION GAMING COMMISSION
RULES AND REGULATIONS

CHAPTER:	Authorization of Gaming Activity	CHAPTER #:	VII
SUBJECT:	Roulette	SECTION – SUBSECTION:	F
EFFECTIVE DATE:	mm/dd/yyyy	SUPERSEDES MATERIAL DATED:	
APPROVED BY:		DATE:	

PURPOSE

The purpose of this Chapter is to implement relevant provisions of the Indian Gaming Regulatory Act (IGRA) (25 U.S.C. § 2706, 2710 and 2712), the National Indian Gaming Commission (NIGC) regulations, the Cherokee Nation Code Annotated Title 4 (Gaming Ordinance), the Tribal-State Compact, and other applicable laws and regulations relating to the role and responsibility of Cherokee Nation Gaming Commission (CNGC) to regulate gaming systems, components, and devices within the jurisdiction of CNGC.

SCOPE

This Section shall cover all instruments connected with the play of the game “Craps,” as approved by the CNGC.

AUTHORITY

Title 4 § 22 CNCA
Tribal-State Compact Part 5 (A)
Tribal-State Compact Part 5 (G)

A. DEFINITIONS

1. *Enterprise* – The entity conducting gaming operations on behalf of or as authorized by the Cherokee Nation.
2. *Cherokee Nation Gaming Commission (CNGC)* – The regulatory body established by the Cherokee Nation to oversee and regulate the conduct of gaming on lands owned by the Cherokee Nation.
3. *Compact Game* – An electronic and/or card/table game authorized under the model compact and as described in O.S. Title 3A.

4. *State Compliance Agency (SCA)* – The agency charged with overseeing compact gaming on behalf of the State of Oklahoma; currently, the Office of Management and Enterprise Services.

B. ROULETTE BALL & TABLE LAYOUT

1. A roulette ball must be made completely out of a nonmetallic substance and not less than 12/16 inch or more than 14/16 inch in diameter.
2. Roulette shall be played on a table having a Roulette wheel of at least 30 inches in diameter at one end of the table and a Roulette layout imprinted on the opposite end of the table.
3. A single zero (0) Roulette wheel must have 37 equally spaced compartments around the wheel where the Roulette ball may come to rest. The Roulette wheel must also have a ring of 37 equally spaced areas to correspond to the position of the compartment with a compartment marked zero (0) and colored green and the others marked 1 to 36, which must be placed around the wheel in a clockwise manner and follow the standard placement for Roulette. The color of each compartment must correspond to the colors on the wheel and on the table felt, as approved by the CNGC.
4. Any variations of Roulette must meet the same requirements as stated in number 3 above along with any modifications approved by the CNGC.
5. A double zero (00) Roulette wheel and double zero (00) table layout may be used as a single zero (0) Roulette wheel and single zero table layout if:
 - a. The double zero (00) wager area on the layout is obscured with a cover or other device approved by the CNGC, which clearly indicates the double zero (00) wager is not available.
 - b. Signage is posted at the Roulette table to notify players of the following:
 - i. The double zero (00) Roulette wheel is being used as a single zero Roulette wheel and that double zero (00) is not an available wager.
 - ii. If the Roulette ball comes to rest in the compartment marked double zero (00), the spin will be declared void and the wheel will be re-spun.
 - iii. Wagers on red, black, odd, even, 1 to 18, and 19 to 36 shall be lost if the Roulette ball comes to rest in a compartment marked zero (0).
6. The layout for a Roulette table shall be submitted for review and approval by the CNGC and contain, at a minimum:
 - a. Specific betting areas for the placement of the wagers authorized by the CNGC.

- b. Signage indicating the minimum and maximum wagers permitted at that table.
7. Each Roulette table must have a drop box and tip box attached in locations as approved by the CNGC.

C. INSPECTION AND SECURITY PROCEDURES

1. Prior to opening a Roulette table, a floorperson or table games supervisor or above shall:
 - a. Inspect the Roulette ball by passing it over a magnet or compass to assure its non-magnetic quality.
 - b. Inspect the Roulette table and Roulette wheel for any magnet or device that would affect the fair operation of the Roulette wheel.
 - c. Inspect the Roulette wheel to assure that the wheel is level and rotating freely and evenly.
 - d. Inspect the Roulette wheel to assure that all parts are secure and free from movement.
 - e. Confirm that the layout and signage comply with approved game play rules if the table is a double zero (00) Roulette wheel is being used as a single zero (0) Roulette wheel.

D. MAKING AND REMOVAL OF WAGER

1. All wagers at Roulette shall be made by placing Roulette chips on the appropriate areas of the Roulette layout. Verbal wagers accompanied by cash may not be accepted.
2. A player at a Roulette table may not play with Roulette chips that are identical in color and design to value chips or to Roulette chips being used by another player at that same table. Roulette chips shall be cashed in for value chips before a player leaves a Roulette table.
3. Each player shall be responsible for the correct positioning of his/her wager on the Roulette layout, regardless of whether he/she is assisted by the dealer. The player shall be responsible for ensuring that the instructions he/she gives to the dealer regarding the placement of a wager are correctly carried out.
4. A wager shall be settled in accordance with its position on the layout when the ball falls into a compartment on the wheel.
5. The Enterprise shall include all allowable wagers within its game play rules, which must be submitted to the CNGC for review and approval. No changes may be made to approved game play rules without written authorization from the CNGC.

6. Side wagers are prohibited.
7. Courtesy wagers (e.g. token bets) may be made pursuant to the following:
 - a. The player may make a courtesy wager for the dealer.
 - b. The player may make courtesy wagers using non-value cheques, on any inside or outside bets. The dealer must announce to the floorperson or table games supervisor "dealer bet on."
 - c. The dealer must collect winning courtesy wagers at the end of the hand; they may not let them ride.
 - d. Upon receipt of a winning courtesy wager, the dealer must tap the table or the wheel with the wager and either:
 - i. Immediately deposit the token in the tip container.
 - ii. Stack and place the tokens on the side of the table until they are colored up for higher denomination cheque(s). The dealer will then tap the table or wheel with the higher denomination cheque(s) and immediately deposit them in the tip container.

E. PAYOUT ODDS

1. The Enterprise shall payout winning Roulette wagers according to the odds contained in the game play rules as approved by the CNGC.
2. When Roulette is played on a single zero (0) wheel or double zero (00) wheel and the Roulette ball comes to rest in a compartment marked zero (0) or double zero (00), wagers on red, black, odd, even, 1 to 18, and 19 to 36 will be lost.
3. When Roulette is played on a double zero (00) wheel being used as a single zero wheel, the following shall apply:
 - a. Notice shall be provided that the double zero (00) wheel is being used as a single zero wheel.
 - b. If the Roulette ball comes to rest on a compartment marked double zero (00), the dealer shall announce "no spin," declare the spin void, and re-spin the wheel.
 - c. Wagers on red, black, odd, even, 1 to 18, and 19 to 36 will be lost if the ball comes to rest in a compartment marked zero (0).

F. ROTATION OF WHEEL AND BALL

1. The Roulette ball shall be spun by the dealer in a direction opposition to the rotation of the wheel and complete at least four (4) rotations around the track of the wheel to constitute a valid spin.
2. While the ball is still rotating in the track around the wheel, the dealer shall announce “no more bets” in a manner sufficient to be heard by all players at the table. Once “no more bets” has been announced by the dealer, players may not touch any chips that have been placed on the Roulette layout until the dealer has collected all losing wagers and paid off all winning wagers.
3. When the ball comes to rest in a compartment, the dealer shall announce the number of the compartment and shall place a point marker on that number on the Roulette layout.
4. After placing the point market on the layout, the dealer shall first collect all losing wagers and then payoff all winning wagers.

G. IRREGULARITIES

1. If the ball is spun in the same direction as the wheel, the dealer shall announce “no spin” and attempt to remove the Roulette ball prior to it coming to rest in one of the compartments.
2. If the Roulette ball does not complete four (4) revolutions around the track of the wheel, the dealer shall announce “no spin.” The dealer shall inspect the ball for any signs of damage and, if the ball is damaged, ask the floorperson or above for a new Roulette ball with which to continue the game.
3. If a foreign object enters the Roulette wheel prior to the ball coming to rest in a compartment, the dealer shall announce “no spin” and shall attempt to remove the ball from the wheel prior to its coming to rest in one of the compartments.
4. If the Roulette ball leaves the wheel during the spin, the dealer shall announce “no spin.” The dealer shall inspect the ball for any signs of damage and, if the ball is damaged, ask the floorperson or above for a new Roulette ball with which to continue the game.
5. If a player or dealer error occurs, the table games supervisor may offer the player, at the supervisor’s discretion, remedies to correct the error so long as they are not in conflict with approved game rules, internal controls, or table games standard operating procedures.
6. Table games management has the authority to handle unspecified irregularities and disputes at their discretion; provided any decision made is in accordance with Enterprise dispute resolution procedures approved by the CNGC.

7. Table games management must notify the CNGC if any player is involved in suspicious activity or if any regulation violation is suspected or verified.



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CHEROKEE NATION
GAMING COMMISSION
MEMORANDUM

To : John Sparks, Chairman
Steve Barrick, Vice-Chairman
Jennifer Goins, Commissioner
Tina Glory-Jordan, Commissioner
Janice Walters-Purcell, Commissioner

From : Jamie Hummingbird, Director

Date : 30 April 2018

Re : Proposed TICS Technical Amendments – Craps & Roulette

With the passage of an amended Tribal-State Compact allowing for physical balls and dice to be used in the games of Craps and Roulette, it is necessary to amend the Cherokee Nation Gaming Commission (CNGC) Tribal Internal Control Standards (TICS) to provide for controls specific to these games.

In order to meet the National Indian Gaming Commission Minimum Internal Control Standards at Sections 542.12(f)(3) and 542.43(p)(4), the following technical amendments to the CNGC TICS are necessary; a scrivener's error is also being corrected:

Section 8.1 (A)(1)

A supervisor may function as a dealer without any other supervision if disputes are resolved by supervisory personnel independent of the transaction or independent of the ~~card~~ table games department

Section 8.5(A)(3)

The CNGC, or the gaming operation as approved by the CNGC, shall establish and the operation shall comply with a reasonable time period, which shall not exceed seven (7)

days, within which to mark, cancel or destroy cards [and dice from play](#). This standard shall not apply where playing cards [or dice](#) are retained for an investigation.

Section 22.11(B)

All roulette areas shall have one (1) overhead dedicated camera covering the ~~card shuffler/reader~~ [roulette wheel](#) and shall also have one (1) dedicated camera covering the play of the table.