

**SECTION 14**  
**CAGE OPERATION**

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**14.1 Casino Credit – Checks, Credit/Debit Transactions**

- A. As approved by the Cherokee Nation Gaming Commission (CNGC), the operation shall establish and comply with procedures for the acceptance of credit instruments including checks and credit/debit transactions with appropriate controls for purposes of security and integrity and in accordance with CNGC Rules & Regulations (R&Rs). The operation shall further establish a policy for promoting responsible gaming in regards to the acceptance of credit instruments.
- B. Personal checks may be accepted into Cage accountability provided they are warranted by and in accordance with procedures established by a national check clearing firm. The CNGC must approve all related procedures and agreements prior to implementation.
- C. Cashier's checks, traveler's checks, money orders, and/or other guaranteed drafts or major credit and/or bank debit cards may be accepted into Cage accountability only with proper identification and in accordance with the Bank/Issuer or Credit Service requirements. Automated Teller Machines (ATMs) and Cash Access devices are exempt from this standard. The CNGC must approve all related procedures and agreements.
- D. The CNGC must approve all procedures and agreements related to ATMs and Cash Access devices. Such devices are considered

secured/controlled equipment and are subject to other control standards, as applicable, in this document (e.g. Key and Access Control, Information Technology, Surveillance, etc.).

- E. In the case of government, payroll, and/or business checks, which are not warranted, the operation, as approved by the CNGC, shall establish and shall comply with procedures which shall include the criteria used to evaluate the credit reputation or financial resources to determine that there is a reasonable basis for extending the credit in the amount or sum placed at the customer's disposal.
- F. ~~The operation shall not buy back casino checks issued for payment of winnings (e.g., jackpots, accumulated gaming credits, chips redemptions, etc.). The CNGC must approve all procedures related to other check buy backs (i.e. vendor checks).~~ The CNGC shall approve all procedures, and any subsequent changes made thereto, related to the buying back of checks issued by a gaming facility.
- G. Procedures for the acceptance of allowable credit instruments (checks, and credit/debit transactions) shall include, at a minimum, the following:
  - 1. Examination of the instrument;
  - 2. Customer identification requirements;
  - 3. Documentation requirements;

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4. Guarantor/Bank/Issuer authorization (as applicable);
5. Employee authorization and limits; and,
6. Signature attestation requirements.

**14.2 Cage and Vault Accountability Standards**

- A. All transactions that flow through the cage shall be summarized on a cage accountability form for each shift and shall be supported by documentation.
- B. Increases and decreases to the total casino cage inventory or reserve shall be supported by documentation. Documentation shall include the date and shift, the purpose of the increase/decrease, the name, identification number, and signature of the person(s) completing the transaction, and the name, identification number, and signature of the person or department receiving the cage funds (for decreases only).
- C. The cage and vault inventories shall be counted by the oncoming and outgoing cashiers who shall make individual counts for comparison of accuracy and maintenance of individual accountability. Such counts shall be recorded at the end of each shift during which the activity took place. All discrepancies shall be noted and investigated. Unverified transfers of cash and/or cash equivalents are prohibited.

- D. Bulk counts of strapped/bundled currency may be accepted from the Soft Count into the Cage/Vault and between Vault shifts provided:

1. Bundled/strapped currency received is traceable to the origin (e.g. Soft Count), identification number, employee initials, and date recorded on each strap of the last person who verified the currency;

2. Cage/Vault procedures provide for a rotation and audit of bundled/strapped currency received within a twenty-four (24) hour period after acceptance into Cage accountability; and,

3. All loose currency must be verified in accordance with standards in paragraph C.

- E. The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with a minimum bankroll formula to ensure the gaming operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the gaming operation's customers as they are incurred. A suggested bankroll formula will be provided by the CNGC upon request.

**14.3 Customer Deposited Funds**

If a gaming operation permits a customer to deposit funds for safekeeping or front money purposes with the operation at the Cage, the following standards shall apply:

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- A. A file for the customer shall be prepared prior to acceptance of a deposit.
- B. The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with procedures that verify the customer's identity, by examination of photo identification.
- C. Only cash and approved cash equivalents/casino instruments shall be accepted from customers for the purpose of a customer deposit.
- D. All customer deposits and withdrawal transactions at the cage shall be recorded on a cage accountability form on a per-shift basis.
- E. The receipt or withdrawal of a customer deposit shall be evidenced by a numerically controlled, completed two (2) part document with one (1) copy given to the customer and one (1) copy remaining in the cage file.
- F. Each of the two (2) parts of the sequentially-numbered receipt shall contain the following information:
  - 1. Same sequentially-numbered receipt number on each copy;
  - 2. Customer's name and signature;
  - 3. Date of receipt and/or withdrawal;
  - 4. Dollar amount of deposit/withdrawal;
- 5. Nature of deposit/withdrawal (cash, check, chips); and
- 6. The name, identification number, and signature of the employee who conducted the transaction.
- G. The operation, as approved by the CNGC, shall establish and comply with procedures that:
  - 1. Maintain a detailed record by customer name and date of all funds on deposit and withdrawals;
  - 2. Maintain a current balance of all customer cash deposits that are in the Cage/Vault inventory or accountability; and
  - 3. Reconcile this current balance with the deposits and withdrawals at least daily.
- H. The operation, as approved by the CNGC, shall describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form ensuring that the form is signed by the cashier.

**14.4 Safe Deposit Boxes**

- A. The operation shall establish and comply with procedures, as approved by the CNGC, for the utilization of safe deposit boxes, wherein the operation maintains custody.
- B. Access to safe deposit boxes shall be controlled with at least two (2) keys. One controlled by the operation and

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one issued to the customer, which shall be unique to each box.

- C. The customer must sign a log each time they access their respective safe deposit box, which shall include a date/time stamp and the employee who provided access on behalf of the operation.
- D. The issuance and closure of a customer's safe deposit box in the cage shall be evidenced by a document that includes the following information:
  - 1. Safe deposit box number;
  - 2. Date of issuance and closure;
  - 3. Customer's name and signature;
  - 4. Verification of the customer's identity by examination of an identification credential (e.g. driver's license) or other method to ensure the customer's identity. The identification credential information shall be documented; and
  - 5. The name, identification number and signature of the employee who issued or closed the safe deposit box.
- E. The operation shall establish and comply with procedures to maintain a detailed record of all Cage/Vault safe deposit boxes and the current status of each box (e.g. issued, not issued, inactive).
- F. These standards shall apply to all safe deposit boxes, wherein the

operation has guardianship (including non-gaming areas).

**14.5 Chip Standards**

The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with procedures for the receipt, inventory, storage, and destruction of gaming chips.

**14.6 Accounting/Auditing Standards**

The operation shall comply with the following standards:

- A. The cage shall be counted by Revenue Audit and reconciled to the general ledger at least monthly.
- B. The gaming operations shall comply with the following for all cage accounting procedures:
  - 1. Document all procedures and any follow-up procedures;
  - 2. Maintain documentation for inspection; and,
  - 3. Provide all documentation to CNGC for approval.

**14.7 Extraneous Items**

- A. The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, into and out of the cage and/or vault. Items for medical purposes (e.g. throat lozenges, cough drops, or hard candy) are acceptable.

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B. Employees working within the cage area(s) are strictly prohibited from having any personal items with them, except as provided for in 14.6 (A). This shall include but not be limited to the following items:

1. Purses, backpacks, outerwear, etc.;
2. Personal funds;
3. Personal toiletries (e.g. hand lotion, make-up, hair brush, mirrors, cigarettes, etc.); and,
4. Personal electronics and/or equipment (e.g. cellular phones and/or other communications devices, music player, camera, etc.).

C. Food and drinks are prohibited within the cage area(s). This shall not prohibit the utilization of a water cooler in this area or other clear liquids provided they are in a clear cup secured with a clear lid.

D. Secured areas shall 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 secured areas are prohibited.

E. Trash cans and trash bags shall be clear or mesh so as not to obstruct the view of Surveillance.

**14.8 Cage Cashier Access**

A. This area is highly restricted, and only those individuals with sufficient security clearance shall be permitted entry to this area.

B. Employees of the gaming operation not specifically allowed access by title, shall sign an access log upon entering and exiting the area, and shall be accompanied by personnel who are specifically allowed access to this area.

C. Persons authorized to enter the Cage/Vault area without escort shall be listed by title with a corresponding level of access. The operation is responsible to update the list and provide the list to the CNGC every thirty (30) days. At a minimum, the monthly report shall include the title of authorized persons, any changes made, and/or a statement indicating no changes were made from the previous report submitted to the CNGC.

**14.9 General Procedures**

The standards in Sections 4, 16, and 19 shall also apply to Section 14.