

# СМУЯ DBP ЛӨЛСФЭУ Dhaoibh CHEROKEE NATION GAMING COMMISSION

## ADMINISTRATIVE PROCEDURES ACT POSTING

TITLE: Proposed Cherokee Nation Gaming Commission Rules and Regulations & Tribal

**Internal Control Standards** 

**TYPE OF ACTION:** Notice of Proposed Amendments

## PROPOSED RULES:

CHEROKEE NATION GAMING COMMISSION RULES & REGULATIONS

Chapter IV-H – External Audit

#### CHEROKEE NATION GAMING COMMISSION TRIBAL INTERNAL CONTROL STANDARDS

Section 1 – Definitions

Section 2 – Compliance

Section 3 – Small and Charitable

Section 4 – General Provisions

Section 5 – Live Bingo

Section 6 – Pull Tabs

Section 7 – Gaming Systems

Section 8 – Table Games

Section 9 – Card Games

Section 10 – Pari-Mutuel

Section 11 – Casino Instruments

Section 12 – Drop and Count

Section 13 – Cage Operations

Section 14 – Key & Access Controls

Section 15 – Promotions

Section 16 – Complimentaries

Section 17 – Player Tracking

Section 18 – Financial Transactions

Section 19 – Accounting

Section 20 – Information Technology

Section 21 – Auditing Revenue

Section 22 – Surveillance

Section 23 – Internal Audit

Section X – Lines of Credit

Section XX – Keno

**PUBLICATION DATE:** 26 June 2019

#### **SUMMARY:**

The purpose of the attached proposed rule amendments is to implement recommended changes to the tribal internal control standards and related rules and regulations, incorporating: mandatory changes from the National Indian Gaming Commission Minimum Internal Control Standards (25 C.F.R. Section 543); changes to the National Indian Gaming Commission Class III Minimum Internal Control Standards (25 C.F.R. Section 542); changes based on the State Compliance Agency Advisory Memo regarding the changes to 25 C.F.R. Section 542; changes identified through various tribal internal control audit reports issued by the Cherokee Nation Gaming Commission Audit department.

#### **AUTHORITY:**

Title 4 CNCA §§ 22

Tribal-State Compact Part 5 (B)

NIGC MICS § 543

NIGC MICS § 542

NIGC § 547

NIGC Bulletin 2018-3 – Guidance on Class III Minimum Internal Control Standards

OK OMES Advisory Memo 2018-01

#### **REGULATORY ANALYSIS:**

No regulatory analysis of the revised rule was performed.

#### **COMMENT PERIOD:**

Written comments must be received on or before 5 p.m., Friday, 26 July 2019.

#### **SUPPLEMENTARY INFORMATION:**

Comments may be submitted electronically at <a href="mailto:gaming-commission@cherokee.org">gaming-commission@cherokee.org</a>. 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 Rules and Regulations may be obtained by submitting a request electronically or in writing using either of the above electronic / physical addresses.

The Tribal-State Compact may be accessed by visiting the State Compliance Agency website at <a href="https://www.ok.gov/OSF/Tribal\_Gaming">www.ok.gov/OSF/Tribal\_Gaming</a>.

#### **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 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.

As a result of the Colorado River Indian Tribes v. NIGC case, which held the NIGC did not have the authority to promulgate MICS that would apply to Class III gaming, the NIGC promulgated a set of Class II gaming MICS in October 2012, as codified in Section 25 CFR §543; Section 542 remains as an active statute.

The Cherokee Nation entered into a gaming compact with the State of Oklahoma in 2005 (Compact). 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)."

With the passage of Legislative Act 17-14, the Cherokee Nation Tribal Council (CNTC), through Section 22 (C) of the Act, changed the CNGC's rulemaking scope and authority stating "that rules and regulations promulgated...shall not exceed or conflict with the regulations issued by the National Indian Gaming Commission, including but not limited to the National Indian Gaming Commission Minimum Internal Control Standards."

The Attorney General's office drafted a set of proposed revisions to the CNGC TICS, which considered by the Gaming Commission on 3 February 2017. The proposed revisions were approved for publication and public comment pursuant to the Cherokee Nation Administrative Procedures Act and were formally adopted on 18 August 2017.

Recent audits conducted by the CNGC Audit department have identified numerous deficiencies in which the TICS do not contain standards required by either the NIGC MICS or the Tribal-State Compact.

These deficiencies are in addition to / match those identified by the NIGC in their letter to the Commission on 21 July 2017 wherein they listed thirty-three (33) areas in which the then-proposed TICS did not meet the NIGC MICS.

On 13 August 2018, the NIGC published a final rule suspending the Class III MICS contained in 25 C.F.R. Section 542. The next day, the NIGC issued Bulletin 2018-03 – Guidance on the Class III Minimum Internal Control Standards that provided non-binding guidance for Class III MICS; this was done to address Tribal-State Compact issues where the 542 MICS are incorporated by reference. The final rule and bulletin both became effective on 27 September 2018.

The guidance bulletin presented a revamped set of Minimum Internal Control Standards; similar in appearance to those in 542, but with rearranged sections and selected modified standards.

In response to the NIGC Bulletin, the State Compliance Agency (SCA) published Advisory Memorandum 2018-01 on 28 August 2018 in which the SCA makes the following points:

- ∞ Compact terms required tribes to maintain TICS that equal or exceed 25 CFR 542;
- ∞ There may be instances where the 542 MICS are inconsistent or conflict with the NIGC guidance document; and,
- ∞ Where inconsistencies or conflicts exist, tribes should consider adopting the more stringent requirement.

In order to determine if an inconsistency or conflict exists required a comparison of each standard from each document. A stringency assessment was performed to determine which standard to recommend for adoption; these changes are noted in the proposed amendments.

Finally, on 21 December 2018, the NIGC published a final rule amending the 543 (Class II) MICS, reinstating key control standards that were inadvertently removed in an earlier rulemaking process. The effective date of these changes is Tuesday, 22 January 2018. Although no compliance date was specified it is incumbent on the CNGC to revise its TICS to meet the MICS as soon as practicable.

The CNGC TICS must be revised to remove deficiencies to bring them in line with the NIGC MICS and/or Tribal-State Compact, as well as incorporate the recent changes brought about through the Bulletin and the final rule published in December 2018. To this end, a series of comparison documents were drafted to present the existing TICS in relation to the language contained in the relevant source documents, along with recommended revisions.

The CNGC is mandated to make certain changes by virtue of the NIGC actions. Similarly, the CNGC must correct errors in the TICS as they are identified, to bring them into compliance with the relevant source document. In making these select modifications, the CNGC maintains its adherence to Title 4 – Section 22 (C) by adopting the internal control requirements as prescribed by the federal and state governments.



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# CHEROKEE NATION GAMING COMMISSION RULES AND REGULATIONS

CHAPTER:	Financial Accountability	CHAPTER #:	IV
SUBJECT:	External Audit	SECTION – SUBSECTION:	Н
EFFECTIVE DATE:		SUPERSEDES MATERIAL DATED:	7/28/2008
APPROVED BY:		DATE:	6/21/2008

#### **PURPOSE**

The purpose of this Section is to provide for the an annual independent external audit of all gaming operations under the jurisdiction of the Cherokee Nation Gaming Commission in accordance with the provisions set forth in the Indian Gaming Regulatory Act, National Indian Gaming Commission Regulations, Tribal-State Gaming Compact(s), and Title 4 of the Cherokee Nation Code Annotated.

Pursuant to Section 31 of Title 4 of the Cherokee Nation Code Annotated, and in accordance with the Tribal -State Compact Cherokee Nation Gaming Commission (CNGC) is responsible for ensuring that an annual independent audit is conducted for each gaming operation under the jurisdiction of CNGC. CNGC is also responsible for selecting the external auditor.

Pursuant to 25 C.F.R. Part 571 et. seq., the annual independent audit is required to be submitted to the National Indian Gaming Commission (NIGC) no later than one-hundred twenty (120) days after the end of the gaming operation's fiscal year. The annual independent audit reports are required to be submitted to the State Compliance Agency (SCA) no later than one hundred fifty (150) days after the end of the gaming operation's fiscal year.

#### **SCOPE**

The provisions of this Section shall apply to the Certified Public Accountant/Accounting Firm selected to perform the Annual Independent Audit, the Enterprise, in regard to providing unfettered, unrestricted access to the accounting systems and records, and the CNGC for overseeing the audit and submitting the result to the appropriate parties within the time frames established.

#### **AUTHORITY**

Title 4 § 40 CNCA
Title 4 § 43 CNCA
25 U.S.C. §§ 2710 IGRA
25 CFR 571
25 CFR 522
Tribal-State Gaming Compact, Part 5, paragraph (F)
Off-Track Wagering Compact, Section 9

#### A. DEFINITIONS

- 1. Cherokee Nation Gaming Commission (CNGC) The regulatory body established by the Cherokee Nation to oversee and regulate the conduct of gaming on Indian lands owned or leased by the Cherokee Nation or the Enterprise.
- 2. *Enterprise* The entity conducting gaming operations on behalf of or as authorized by the Cherokee Nation under the terms of the Indian Gaming Regulatory Act (IGRA) or pursuant to a Tribal-State Compact to which the Nation is a party.

#### B. DUTIES OF THE ENTERPRISE.

- 1. Each licensed gaming operation shall keep permanent books of account or records, including inventory records of gaming supplies, sufficient to establish the amount of gross and net income, deductions and expenses, receipts and disbursements, and other information required in any financial statement, report or other accounting prepared in connection with the operation.
- 2. The Enterprise shall prepare comparative financial statements covering all financial activities of each licensed gaming operation on Indian lands for each fiscal year. Preparation and fair presentation of the financial statements shall conform to Generally Accepted Accounting Principles (GAAP).
- 3. The CNGC, NIGC, and/or the SCA require the Enterprise to submit statements, reports, and/or accountings for each licensed gaming operation, and to keep specific records that will enable agent(s)/representatives to determine whether or not such operation:
  - a. Is liable for fees payable and in what amount (refer to CNGC Rules & Regulations, Chapter IV C);
  - b. Has properly and completely accounted for all transactions and other matters monitored by the CNGC, NIGC, and/or SCA in accordance with the established MICS, any Tribal Gaming Compact(s), TICS, and/or other laws, regulations, contracts and grants applicable to the operation; and
  - c. Has designed, implemented, and maintains a system of internal controls (or SICS) relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
- 4. Accounting books or records required by the CNGC and NIGC regulations shall be kept at all times available for inspection by authorized agent(s)/representative(s). They shall be retained for no less than five (5) years.

- 5. The Enterprise and/or gaming operation shall provide agent(s)/representative(s) of the external independent auditor:
  - a. Unrestricted access to all information of which management is aware that is relevant to the preparation and presentation of the financial statements, such as records, documentation and other matters;
  - b. Any additional information or access requested by the auditor for the purpose of the audit; and
  - c. Unrestricted access to any persons within the entity from whom the auditor determines necessary to obtain audit evidence.
- 6. The Enterprise shall assume all costs in connection with the audit.

#### C. DUTIES OF THE CNGC.

- 1. The CNGC shall ensure an annual independent financial statement audit of all licensed gaming operations is conducted as prescribed by this regulation.
- 2. In conjunction with the annual independent financial statement audit, required under paragraph (C)(1), the CNGC shall ensure the CPA/Firm performs an "Agreed-Upon Procedures" (AUP) assessment to verify that each gaming operation is in compliance with the MICS, and/or TICS and SICS. The CPA/Firm may rely on internal audit to perform work related to the assessment in accordance with the AUP Scope of Work.
- 3. In addition, the CNGC shall ensure the CPA/Firm performs a separate audit and expresses an opinion on the operation's Adjusted Gross Revenues and Exclusivity Fees, as required by the Tribal Gaming Compact for Covered Games.
- 4. The CNGC shall engage an independent CPA/Firm (external auditor), or agree upon a CPA/Firm with the Enterprise and/or Cherokee Nation Tribal government (if the audit is encompassed within the existing independent Tribal audit system or in conjunction with the audit of the Enterprise). The CNGC must ensure:
  - a. The CPA/Firm selected is of known and demonstrable experience, expertise, and stature in conducting audits, of the kind and scope required under this regulation; and
  - b. The CPA/Firm selected must be licensed by the State Board of Accountancy.
- 5. The CNGC shall be responsible for communicating the status and/or results of the audit if the external independent audits, including the financial statements and independent auditor's report, together with management's letter(s), the AUP, and other documented auditor communications and/or reports, to the NIGC as follows:

- a. The CNGC shall submit two (2) paper copies or one (1) electronic copy of the aforementioned documents within 120 days of the gaming operation's fiscal year end.
- b. If a gaming operation changes its fiscal year, the CNGC shall submit two (2) paper copies or one (1) electronic copy of the aforementioned documents for the stub period from the end of the previous fiscal year to the beginning of the new fiscal year. The submission must be sent to the NIGC within 120 days after the end of the stub period. Alternatively, the audit may incorporate the financial results of the stub period in the financial statements for the new business year.
- c. If a gaming operation ceases to operate and the CNGC has terminated the facility license, the CNGC shall notify the NIGC in accordance with Facility Licensing Regulations and shall submit (2) two paper copies or one (1) electronic copy of the aforementioned documents covering the period since the period covered by the previous financial statements. The submission must be sent to the NIGC within 120 days after the cessation of gaming activity or upon completion of the gaming operation's fiscal year.
- d. The annual independent audit and related reports required under paragraph (C)(5) must be concluded and reports released to the CNGC within 120 days of the gaming operation's fiscal year end or as otherwise indicated; however, the CPA/Firm may request, within a reasonable time frame, an extension where the circumstances justifying the extension request are beyond the CPA's/Enterprises' control, which must be approved by the CNGC and communicated to the NIGC.
- 6. For the separate audit required under paragraph (C)(3), the CNGC shall be responsible for communicating the status and/or results of the audit of Adjusted Gross Gaming Revenues and Exclusivity Fees to the SCA as follows:
  - a. The CNGC shall submit one electronic copy of the aforementioned document within thirty (30) days of completion.
  - b. The audit required by paragraph (C)(6) must be concluded within five (5) months following the close of each calendar year.
  - c. The CPA/Firm may request, within a reasonable time frame, an extension where the circumstances justifying the extension request are beyond the CPA's/Enterprises' control, which must be approved by the CNGC and communicated to the SCA.

#### D. SCOPE OF WORK.

1. The independent CPA/Firm shall provide an annual audit of the financial statements of all gaming operations licensed by the CNGC for each fiscal year. The annual audit shall conform to Generally Accepted Auditing Standards (GAAS) and the standards applicable

- to financial audits contained in Generally Accepted Government Auditing Standards (GAGAS).
- 2. If the CPA/Firm prepares the comparative financial statements on behalf of the Enterprise, preparation and fair presentation of the financial statements shall conform to Generally Accepted Accounting Principles (GAAP).
- 3. In accordance with paragraph (B)(5), the CPA/Firm shall be granted unrestricted access to inspect, examine, photocopy, and audit all papers, books, and records (including computer records) or persons and facilities for the purpose of completing the audits required under this regulation.
  - a. The CPA/Firm will provide a listing of agent(s)/representative(s) assigned to the audit(s), which shall include the full legal name, job title, and contact number, to the Enterprise and the CNGC for security purposes.
  - b. The CPA/Firm's agent(s)/representative(s) shall present official identification upon entering any secured location(s) necessary to perform the audits.
- 4. If the Enterprise has multiple gaming places, facilities, or locations on the Tribe's Indian lands regulated by the CNGC, the Enterprise may choose to consolidate the financial statements of the gaming places, facilities, or locations. The consolidated financial statements shall include consolidating schedules for each individual gaming place, facility, or location. The CPA/Firm shall express an opinion on the consolidated financial statements as a whole and subjects the accompanying financial information to the auditing procedures applicable to an audit of consolidated financial statements.
- 5. The financial statement audit shall include all gaming related contracts that result in purchases of supplies, services, or concessions for more than \$25,000 in any year (except contracts for professional legal or accounting services).
- 6. All expenditures and/or transfers of Gaming Revenue are subject to the limited purposes permitted under IGRA.
- 7. In conjunction with the annual independent financial statement audit, the CPA/Firm shall perform an "Agreed-Upon Procedures" (AUP) assessment to verify that each gaming operation is in compliance with the MICS, and/or TICS and SICS. The CPA/Firm may rely on internal audit to perform work related to the assessment in accordance with the AUP Scope of Work.
- 8. [Reserved for scope of AUP].

REF	CN TICS Section 1 - Definitions	542.1	542 542.2	NIGC Class III Guidance BULLETIN 2018-3	543.1	543 543.2	543.3	Tribal - State Compact Part 3. Definitions	OTB Compact	Other	Recommended Revisions
The Sta Gan Cor Of g the Tril Inti Min imj	purpose of these Tribal Internal Control 1 ndards is to allow the Cherokee Nation ming Commission (CNGC) to ensure inpliance with Federal law and Tribal State in mact standards for operational conduct of a national control standards for operational conduct of jurisdiction of the Cherokee Nation hal Government and the CNGC. The Tribal ernal Control Standards (TICS) meet the inimum Internal Control Standards have been so the National Indian Gaming nmission (NIGC).	This part establishes the minimum nternal control standards for gaming			543.1 What does this part cover?  This part establishes the minimum internal control standards for the conduct of Class II games on Indian lands as defined in 25 U.S.C. 2701 et seq.		Minimum standards. These are the minimum standards and a TGRA may establish and implement additional controls that do not conflict with those set out in this part. (b) TICS. TGRAs must ensure that TICS are established and implemented that provide the level of control that equals or exceeds that applicable standards set forth in this part. 543.3(a)(b)	As used in this Compact:			
The all soft income core better in a	to definitions in this section shall apply to sections of this document unless enwise noted. These definitions are usive to terms used in Tribal-State npacts. In the event of a discrepancy ween these definitions and those found. Tribal-State Compact(s), the Compact(s) inition shall control.		542.2 What are the definitions for this part?  The definitions in this section shall apply to all sections of this part unless otherwise noted.			The definitions in this section apply to all sections of this part unless otherwise noted. 543.2					The definitions in this section shall apply to all sections of this document unless otherwise noted. These definitions are inclusive to terms used in Tribal State compacts. In the event of a discrepancy between these definitions and those found in a Tribal State Compact(s), the Compact(s) definition shall control.
to wa acc a c Acc Acc rec coi the	count access card – an instrument used access customer accounts for gering at a gaming machine. Account ess cards are used in connection with omputerized account database. count access cards are not "smart data".  countability – All financial instruments, eivables, and patron deposits instituting the total amount for which bankroll custodian is responsible at a en time.		used to access customer accounts for wagering at a garning machine. Account access cards are used in connection with a computerized account database. Account access cards are not "smart cards."  Accountability means all items of cash,	Account access card – an instrument used to access customer accounts for wagering at a gaming machine. Account access cards are used in connection with a computerized account database. Account access cards are not "smart cards."  Accountability. All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.		Accountability. All financial instruments, receivables, and patron deposits constituting the total amount for which the bankroll custodian is responsible at a given time.					
			Accumulated credit payout means credit					<ol> <li>"Electronic accounting system" means an electronic system that provides a secure means to receive, store and access data and record critical functions and activities, as set forth in the State-Tribal Gamino Act:</li> </ol>			Accounting system - an electronic system that provides a secure means to receive, store and access data and record critical functions and activities.  Accumulated credit payout - credit earned in a gaming
cal dro Cal gal or	ual hold percentage – the percentage culated by dividing the win by the por coin-in/credits wagered/cash-in. to be calculated for individual tables or ming machines, type of table games, paming machine on a per-day or nulative basis.		percentage calculated by dividing the win by the drop or coin-in (number of credits wagered). Can be calculated for individual tables or gaming machines, type of table	Actual hold percentage. The percentage calculated by dividing the win by the drop or coin-in (number of credits wagered). Can be calculated for individual tables or gaming machines, type of table games, or gaming machines on a per day or cumulative basis.							machine that is paid to a customer manually in lieu of a machine payout.
gai CN ass	ent - A person authorized by the ming operation, as approved by the GC, to make decisions or perform igned tasks or actions on behalf of the ming operation.			Agent. A person authorized by the gaming operation, as approved by the TGRA, to make decisions or perform assigned tasks or actions or behalf of the gaming operation.		Agent. A person authorized by the gaming operation, as approved by the CNGC, to make decisions or perform assigned tasks or actions on behalf of the gaming operation.		rendering of services with respect to the operation, maintenance or management of covered games. The term "covered game employee" includes, but is not limited to, the	employed in the operation or management of the gaming operation, whether employed by contracted to the Nation or by any person or enterprise providing on-site or off-site services to the Nation within or without the gaming facility.	parent, subsidiary, and/or affiliate companies	Agent - A person/employee authorized by the gaming operation, as approved by the CNGC, to make decisions or perform assigned tasks or actions on behalf of the gaming operation.
								"Adjusted gross revenues" means the total receipts received from the play of all covered games minus all prize payouts:      "Annual oversight assessment" means the assessment described in subsection 8 of Part 11 of this Compact;			Adjusted gross revenues - the total receipts received from the play of all covered games minus all prize payouts.
			Ante means a player's initial wager or predetermined contribution to the pot before the dealing of the first hand.								Ante - a player's initial wager or predetermined contribution to the pot before the dealing of the first hand
	tomated payout – payment issued by achine.		<b><u>Betting station means</u></b> The area designated in a pari-mutuel area that accepts	Automated payout. Payment issued by a machine.  Betting station. The area designated in a parimutuel area that accepts wagers and pays winning bets.		Automated payout. Payment issued by a machine.					Betting station the area designated in a pari-mutuel area that accepts wagers and pays winning bets.
			numbered form used to record the event	Betting Ticket. A printed, serially numbered form used to record the event upon which a wager is made, the amount and date of the wager, and sometimes the line or spread (odds).							Betting-ticket – a printed, serially numbered form used- to-record the event upon which a wager is made, the amount and date of the wager, and sometimes the line or- spread (odds).
acc	acceptor - means the device that epts and reads cash by denomination in er to accurately register customer dits.		and reads cash by denomination in order to accurately register customer credits.  Bill acceptor canister means the box	Bill acceptor. The device that accepts and reads cash by denomination in order to accurately register customer credits.  Bill acceptor canister. The box attached to the bil acceptor used to contain cash received by bill							Bill acceptor/validator - means-the device that accepts and reads cash by denomination and cash equivalents in order to accurately register customer credits.
			cash received by bill acceptors.	acceptor used to contain cash received by bill acceptors.			Page 1 of 12				

CN TICS	542	NIGC Class III Guidance		543		Tribal - State Compact	OTB Compact	Other	Recommended Revisions
Section 1 - Definitions	542.1 542.2	BULLETIN 2018-3	543.1	543.2	543.3	Part 3. Definitions	O18 Compact	Other	Recommended Revisions
		Bill acceptor canister content key. The key used to open the bill acceptor canisters.							
	Bill acceptor canister release key	Bill acceptor canister release key. The key used to							
	<b>means</b> the key used to release the bill acceptor canister from the acceptor device.	release the bill acceptor canister from the bill acceptor device.							
	Bill acceptor canister storage rack key	+							
	means the key used to access the storage								
	rack where bill acceptor canisters are								
Bill acceptor drop – cash contained in bill	Bill acceptor drop means cash contained								Bill acceptor drop – cash contained in bill accepto
acceptor canisters.	in bill acceptor canisters.	acceptor canisters.							<del>canisters.</del>
<b>Bill-in meter</b> – a meter included on a gaming machine accepting cash that tracks	gaming machine accepting cash that tracks	a Bill in meter. A meter included on a gaming machine accepting cash that tracks the number							
the number of bills put in the machine.	the number of bills put in the machine.	of bills put in the machine.							
	<b>Boxperson means</b> the first-level supervisor	Boxperson. The first-level supervisor who is							Boxperson - the first-level supervisor who is respo
		in responsible for directly participating in and supervising the operation and conduct of a craps							for directly participating in and supervising the ope
	and supervising the operation and conduct of a craps game.	game.							and conduct of a craps game.
Breakage – the difference between actual	<u>Breakage</u> means the difference between	Breakage. The difference between actual bet		+					Breakage the difference between actual bet ame
bet amounts paid out by a racetrack to	actual bet amounts paid out by a racetrack to	to amounts paid out by a racetrack to bettors and							paid out by a racetrack to bettors and amounts wo
bettors and amounts won due to bet payments being rounded up or down. For	bettors and amounts won due to bet payments being rounded up or down. For	amounts won due to bet payments being rounded up or down. For example, a winning							to bet payments being rounded up or down. For e
example, a winning bet that should pay Four	example, a winning bet that should pay \$4.25	bet that should pay \$4.25 may be actually paid at							Five Cents (\$4.25) may be actually paid at Four Do
Dollars and Twenty Five Cents (\$4.25) may be actually paid at Four Dollars and Twenty	may be actually paid at \$4.20 due to rounding.	\$4.20 due to rounding.							and Twenty Cents (\$4.20) due to rounding.
Cents (\$4.20) due to rounding.	g								
Cage – a secure work area within the		Cage. A secure work area within the gaming		Cage. A secure work area within the					
gaming operation for cashiers, which may include a storage area for the operation's	gaming operation for cashiers and a storage area for the gaming operation bankroll.	operation for cashiers, which may include a storage area for the gaming operation bankroll.		gaming operation for cashiers, which may include a storage area for the					
bankroll.				operation's bankroll.					
Cage accountability form – an itemized list of the components that make up the cage	<u>Cage accountability form</u> means an itemized list of the components that make up	Cage accountability form. An itemized list of the							
accountability.	the cage accountability.	accountability.							
	<u>Cage Credit</u> means advances in the form of cash or gaming chips made to customers at								Cage Credit - advances in the form of cash or gar chips made to customers at the cage. Documente
	the cage. Documented by the players signing								the players signing an IOU or a marker similar to a
	an IOU or a marker similar to a counter check								counter check.
	Cage marker form means a document,								Cage marker form - a document, signed by the
	signed by the customer, evidencing an extension of credit at the cage to the								customer, evidencing an extension of credit at the to the customer by the gaming operation.
	customer by the gaming operation.  Calibration module means the section of a	_							, , , , , ,
	weigh scale used to set the scale to a specific								
	amount or number of coins to be counted.								
		h Call bets. A wager made without cash or chips,							Call bets - means a wager made without cash or ch
	or chips, reserved for a known customer and includes marked bets (which are	reserved for a known customer and includes marked bets (which are supplemental bets made							reserved for a known customer and includes marke (which are supplemental bets mde during hand of
		during a hand of play). For the purpose of							For the purpose of settling a call bet, a hand of pla
		d settling a call bet, a hand of play in craps is defined as a natural winner (e.g., seven or eleven							craps is defined as a natural winner (e.g., seven or or the come-out roll), a natural loser (e.g., a two, t
	(e.g., seven or eleven or the come-out roll), a	on the come-out roll), a natural loser (e.g., a two,							twelve on the come-out roll), a seven-out, or the
		three or twelve on the come-out roll), a seven- er out, or the player making his point, whichever							making his point, whichever comes first.
Card game – a game in which the gaming operation is not party to wagers and from	<u>Card game</u> means a game in which the gaming operation is not party to wagers and	4				"Nonhouse-banked card games" means any card game in which the tribe has no interest in the outcome of the game,			
which the operation receives compensation	from which the gaming operation receives					including games played in tournament formats and games in			
in the form of a rake, a time buy-in, or other	compensation in the form of a rake, a time buy-in, or other fee or payment from a playe	or				which the tribe collects a fee from the player for participating,			
fee or payment from a player for the privilege of playing.		*				and all bets are placed in a common pool or pot from which all player winnings, prizes and direct costs are paid. As			
	for the privilege of playing.								
	for the privilege of playing.					provided herein, administrative fees may be charged by the			
	tor the privilege of playing.								
	tor the privilege of playing.					provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee			
Coul seem book the countries found						provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee paid the state; provided that the tribe may seed the pool as it			
Card room bank – the operating fund assigned to the card room or main card	Card room bank means the operating func assigned to the card room or main card roon					provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee paid the state; provided that the tribe may seed the pool as it			
room bank.	<u>Card room bank</u> , means the operating fund	m		Cach guivalent Down		provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee paid the state; provided that the tribe may seed the pool as it			
assigned to the card room or main card	<u>Card room bank</u> , means the operating fund			Cash equivalents. Documents, financial instruments other than cash,		provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee paid the state; provided that the tribe may seed the pool as it			
assigned to the card room or main card room bank.  Cash equivalents – documents, financial instruments other than cash, or anything else of representative value to which the	<u>Card room bank</u> , means the operating fund	Cash equivalents. Documents, financial instruments other than cash, or anything else of representative value to which the gaming		financial instruments other than cash, or anything else of representative		provided herein, administrative fees may be charged by the tribe agains any common pool in an amount equal to any fee paid the state; provided that the tribe may seed the pool as it			
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CN TICS Section 1 - Definitions	542 542.1 542.2	NIGC Class III Guidance BULLETIN 2018-3	543.1	543 543.2	543.3	Tribal - State Compact Part 3. Definitions	OTB Compact	Other	Recommended Revisions
				Voucher system. A system that securely maintains records of vouchers and coupons; validates payment of vouchers; records successful or failed payments of vouchers and coupons; and controls the purging of expired vouchers and coupons.					Casino management system - A system that securel maintains records of cash-out tickets/vouchers and coupons; validates payment of cash-out tickets/vouchers records successful or failed payments of cash-out tickets/vouchers and coupons; and controls the purgi of expired cash-out tickets/vouchers and coupons.
Chips – cash substitutes, in various denominations, issued by a gaming operation and used for wagering.	<b>Chips means</b> cash substitutes, in variou denominations, issued by a gaming oper and used for wagering.	s Chips. Cash substitutes, in various ation denominations, issued by a gaming operation and used for wagering.							
Class II gaming – Class II gaming has the same meaning as defined in 25 U.S.C. 2703(7)(A).				Class II gaming. Class II gaming has the same meaning as defined in 25 U.S.C. 2703(7)(A).				CN LA17-14 §4.D. "Class II Gaming" means: (1) Bingo or lotto (whether or not electronic, computer, or other technological aids are used) when players: (a) Play for prizes with cards bearing numbers or other designations; (b) Cover numbers or designations when object, similarly numbered or designated, are drawn or electronically determined; and (c) Win the game by being the first person to cover a designated pattern on such cards. (2) If played in the same location as bingo or lotto, Class II gaming includes: (a) Pull +tabs, punch boards, tip jars, instant bingo, and other games similar to bingo; and (b) Non-banking games that: (f) State law explicitly authorizes, or does not explicitly prohibit, and are played legally anywhere in the state; and (ii) Play in conformity with state laws and regulations concerning hours, periods of operation, and limitations on wagers and pot sizes.	
Class II gaming system – all components,				Class II gaming system. All		"Central computer" means a computer to which player			
Liass I gaming system—all components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations or part \$47.				Cross in gaming system. All components, whether or not technologic aids in electronic, computer, mechanical, or other technologic form, that function together to aid the play of one or more Class II games, including accounting functions mandated by these regulations or part 547 of this		central computer means a computer to which player terminals are linked to allow competition in electronic bonanza-style bingo games;			
							Class III Gaming means all forms of gaming defined in 25 U.S.C. \$2703 (8).  Limited Class III Gaming means off-track betting.	CN LA17-14 \$4.E. "Class III Gaming" includes all those forms of gaming that are not Class I or Class II gaming.  IGRA 2703(8) The term "class III gaming" means all forms of gaming that are not class I gaming	Class III/Covered gaming - means all forms of gamithat are not strictly class I gaming or class II gaming, defined by any Tribal State Compact to which the Na is a party.
Coin-in meter – meter that displays the total amount wagered in a gaming machine that includes coins-in and credits played.	Coin-in meter means the meter that displays the total amount wagered in a gaming machine that includes coins-in a credits played.	Coin-in meter. The meter that displays the total amount wagered in a gaming machine that includes coins-in and credits played.						or class II gaming	
Coin room – an area where coins and tokens are stored.		And Coin room. An area where coins and tokens are stored.							Coin room an area where coins and tokens are sto
CNGC – (Cherokee Nation Gaming Commission) the tribally designated entity responsible for gaming regulation. In accordance with Cherokee Nation Code Annotated Title 4, the Cherokee Nation Gaming Commission is the Tribal Gaming Regulatory Authority (TGRA) and designated as the responsible party for gaming regulation.	Tribal gaming regulatory authority means the tribally designated entity responsible for gaming regulation.			TGRA. Tribal gaming regulatory authority, which is the entity authorized by tribal law to regulate gaming conducted pursuant to the Indian Gaming Regulatory Act.		governmental agency that has the authority to carry out the	the person or persons appointed by the Nation to be responsible for regulatory oversight of the Nation's gaming.		
Compact – means the "Tribal Gaming Compact" between the Cherokee Nation and the State of Oklahoma, as approved on December 28, 2004.						*Compact* means this Tribal Gaming Compact between the state and the tribe entered into pursuant to Sections 21 and 22 of the State-Tribal Gaming Act;	Compact means this document and any appendices attached hereto.	Nation and the State of Oklahoma, as approved	Compact – means-the "Tribal Gaming Compact" or a other agreement and/or appendices thereto between Cherokee Nation and the State of Oklahoma, as appropriete on December 28, 2004 for the purposes of conductin Class III gaming.
Complimentary services and items — services and items provided at no cost, or at a reduced cost, to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses. Complimentary services and items exclude any services and/or items provided, at no cost or at a reduced cost, to a person for business and/or governmental purposes, which are categorized and treated as business expenses of the gaming operation.	<b>Complimentary means</b> a service or iter provided at no cost, or at a reduced cost customer.	Complimentary services and items. Services and items provided to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses.		Complimentary services and items. Services and items provided to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses.					Complimentary services and items – services and it provided at no cost, or at a reduced cost, to a patron . the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the operatic Services and items may include, but are not limited to travel, lodging, food, beverages, or entertainment expenses. Complimentary services and items exclude services and/or items provided, at no cost or at a reduced, to a person for business and/or governmental-purposes, which are categorized and treated as busine expenses of the gaming operation.
Controls – means Systems of Internal Control Standards, established by gaming operations or enterprise and subject to approve by CNGC.									Controls – means Systems of Internal Control Standa established by gaming operations or enterprise and subject to approve by CNGC.
Count - the act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, player interface, gaming machine, shift, or other period.	<u>Count</u> means the total funds scounted particular game, gaming machine, shift, other period.	for a Count. The act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, player interface, shift, or other period.		Count. The act of counting and recording the drop and/or other funds. Also, the total funds counted for a particular game, player interface, shift, or other period.					

CN TICS Section 1 - Definitions 542.1		543	Tribal - State Compact	OTB Compact	Other Recommended Revisions
	542 NIGC Class III Guidance 542.2 BULLETIN 2018-3	543.1 543.2	543.3 Part 3. Definitions	O1D Compact	Other Recommended Revisions
Count room – a secured room where the	Count room means a room where the coin Count room. A secured room where the count is	Count room. A secured room where			Count room – a secured room where the count is
cash drop and cash equivalents from	and cash drop from gaming machines, table	the count is performed in which the			performed in which the <del>cash drop</del> - cash and cash
gaming machines, table games, or other	games, or other games are transported to equivalents are counted.	cash and cash equivalents are			equivalents <del>from gaming machines, table games</del>
games are transported to and counted.	and counted.	counted.			<del>games are transported to and</del> are counted.
Count team – personnel that perform either	<u>Count team</u> means personnel that perform Count team. Personnel that perform either the				
the count of the gaming machine drop	either the count of the gaming machine drop count of the gaming machine drop and/or the				
and/or the table game drop.	and/or the table game drop. table game drop.				
Counter check – a form provided by the	Country short was as form asserted by Country short. A form asserted by the country				
gaming operation for the customer to use in	<b>Counter check. means</b> a form provided by the gaming operation for the customer to operation for the customer to use in lieu of a				
lieu of a personal check.	use in lieu of a personal check.				
Counter game – a game in which the	<u>Counter game</u> means a game in which the				
gaming operation is a party to wagers and	gaming operation is a party to wagers and				
wherein the operation documents all wagering activity. The term includes, but is	wherein the operation documents all wagering activity. The term includes, but is				
not limited to, bingo, keno, and pari-mutuel	not limited to, bingo, keno, and pari-mutuel				
race books. The term does not include table	race books. The term does not include table				
games, card games and gaming machines.	games, card games and gaming machines.				
	(Adopted May 11, 2006)				
Coupon - A financial instrument of fixed	Coupon. A financial instrument of fixed	Coupon. A financial instrument of			
wagering value that can only be used to	wagering value that can only be used to acquire	fixed wagering value that can only be			
acquire non-cashable credits through	non-cashable credits through interaction with a	used to acquire non-cashable credits			
interaction with a voucher system. This does	voucher system. This does not include	through interaction with a voucher			
not include instruments such as printed	instruments such as printed advertising material	system. This does not include			
advertising material that cannot be validated	that cannot be validated directly by a voucher	instruments such as printed			
directly by a voucher system.	system.	advertising material that cannot be			
		validated directly by a voucher system.			
Covered game – means the following			5. "Covered game" means the following games conducted in		Covered game — means the following games co
games conducted in accordance with the			accordance with the standards, as applicable, set forth in		in accordance with the standards, as applicable,
standards, as applicable, set forth in Sections			Sections 11 through 18 of the State-Tribal Gaming Act: an		in Sections 11 through 18 of the State-Tribal G
11 through 18 of the State-Tribal Gaming			electronic bonanza-style bingo game, an electronic		an electronic bonanza-style bingo game, an ele
Act: an electronic bonanza-style bingo			amusement game, an electronic instant bingo game,		amusement game, an electronic instant bingo
game, an electronic amusement game, an			nonhouse-banked card games; any other game, if the		nonhouse-banked card games; any other game
electronic instant bingo game, nonhouse- banked card games; any other game, if the			operation of such game by a tribe would require a compact and if such game has been: (i) approved by the Oklahoma		operation of such game by a tribe would requir compact and if such game has been: (i) approv
operation of such game by a tribe would			Horse Racing Commission for use by an organizational		Oklahoma Horse Racing Commission for use b
require a compact and if such game has			licensee, (ii) approved by state legislation for use by any		organizational licensee, (ii) approved by state le
been: (i) approved by the Oklahoma Horse			person or entity, or (iii) (!~~approved by amendment of the		for use by any person or entity, or (iii) approved
Racing Commission for use by an			State-Tribal Gaming Act; and upon election by the tribe by		amendment of the State-Tribal Gaming Act;
organizational licensee, (ii) approved by			written supplement to this Compact, any Class II game in use		election by the tribe by written supplement to t
state legislation for use by any person or			by the tribe, provided that no exclusivity payments shall be		Compact, any Class II game in use by the tribe,
entity, or (iii) approved by amendment of			required for the operation of such Class II game.		that no exclusivity payments shall be required for
the State-Tribal Gaming Act; and upon			, , , , , , , , , , , , , , , , , , ,		operation of such Class II game.
election by the tribe by written supplement					,
to this Compact, any Class II game in use by					
the tribe, provided that no exclusivity					
payments shall be required for the					
operation of such Class II game.					
Credit – the right granted by a gaming	Credit means the right granted by a gaming Credit. The right granted by a gaming operation				
operation to a customer to defer payment	operation to a customer to defer payment of to a customer to defer payment of debt or to				
of debt or to incur debt and defer its	debt or to incur debt and defer its payment. incur debt and defer its payment.				
of debt or to incur debt and defer its payment.					Credit limit - the maximum dollar amount of cre
	debt or to incur debt and defer its payment.  Credit limit means the maximum dollar amount of credit assigned to a customer by credit assigned to a customer by the gaming				Credit limit - the maximum dollar amount of creassigned to a customer by the gaming operation
	<u>Credit limit</u> means the maximum dollar Credit limit. The maximum dollar amount of				
	Credit limit means the maximum dollar Credit limit. The maximum dollar amount of amount of credit assigned to a customer by the gaming				
payment.	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit limit. The maximum dollar amount of credit assigned to a customer by the gaming operation.				
navment.  Credit slip – a form used to record the	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record  Credit slip. A form used to record either. (1) The				
Credit slip – a form used to record the return of chips from a gaming table to the	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either. (1) The return of chips from a gaming return of chips from a gaming table to the cage;				
Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs,				
Credit slip – a form used to record the return of chips from a gaming table to the	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either. (1) The return of chips from a gaming return of chips from a gaming table to the cage;				
Credit slip — a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming leader to a customer by the gaming operation.  Credit slip, A form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage				
Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming leader to a customer by the gaming operation.  Credit slip, A form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage	Currency cassette. A compartment that contains a specified denomination			
Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that contains a specified denomination of	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming leader to a customer by the gaming operation.  Credit slip, A form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage	that contains a specified denomination			
Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming leader to a customer by the gaming operation.  Credit slip, A form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage				
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Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or bankroll.  Credit slip. A form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or bankroll.	that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to			
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Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.  Customer deposits – the amounts placed with a cage cashier by customers for the customers' use at a future time.  Deal – a specific pull tab game that has a specific serial number associated with each game.  Dealer – an employee who operates a game, individually or as part of a crew, administering house rules and making paworffs.	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or bankroll.  Customer deposits means the amounts placed with a cage cashier by customers for the customers' use at a future time.  Deal means a specific pull tab game that has a specific serial number associated with each game.  Dealer means an employee who operates a game, individually or as a part of a crew, administering house rules and making payoffs.	that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.			
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Credit slip – a form used to record the return of chips from a gaming table to the cage or the transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or a bankroll.  Currency cassette – A compartment that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.  Customer deposits – the amounts placed with a cage cashier by customers for the customers' use at a future time.  Deal – a specific pull tab game that has a specific serial number associated with each game.  Dealer – an employee who operates a game, individually or as part of a crew, administering house rules and making paxoffs.  Dedicated camera – a video camera that continuously records a specific activity.	Credit limit means the maximum dollar amount of credit assigned to a customer by the gaming operation.  Credit slip means a form used to record either: (1) The return of chips from a gaming table to the cage; or (2) The transfer of IOUs, markers, or negotiable checks from a gaming table to a cage or bankroll.  Customer deposits means the amounts placed with a cage cashier by customers for the customers' use at a future time.  Deal means a specific serial number associated with each game.  Dealer means an employee who operates a game, individually or as a part of a crew, administering house rules and making payoffs.  Dedicated camera means a video camera required to continuously record a specific activity.  Deskman means a person who authorizes payment of winning tickets and verifies payouts for keno games.  Draw ticket means ab lank keno ticket whose numbers are functed out when balls are drawn for the game that is used to verify winning tickets.	that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.  Dedicated camera. A video camera	7. "Documents" means books, records, electronic, magnetic and computer media documents and other writings and materials, copies thereof, and information contained therein;		

Section 1 - Definitions	542.1 542.2	BULLETIN 2018-3 543.1	543         Tribal - State Comp           543.2         543.3         Part 3. Definition	
Drop (for gaming machines) –means the		Drop (for gaming machines). The total amount of	Gaming machine count means the	S  Drop (for gaming machines) — means the total amou
total amount of cash, cash-out tickets,	total amount of cash, cash-out tickets,	cash, cash-out tickets, coupons, coins, and	total amount of coins, tokens, and	of cash, cash-out tickets, and coupons, <del>coins, and tok</del>
coupons, coins, and tokens removed from	coupons, coins, and tokens removed from	tokens removed from drop buckets and/or bill	cash removed from a gaming	removed from drop boxes/financial_casino instrumer
drop boxes/financial instrument storage	drop boxes and/or bill acceptor canisters.	acceptor canisters.	machine. The amount counted is	storage <del>components</del> containers.
components.			entered on the Gaming Machine	
	Bill Acceptor Drop means cash contained in		Count Sheet and is considered the	
	bill acceptor canisters.		drop. Also, the procedure of counting	
			the coins, tokens, and cash or the	
			process of verifying gaming machine	
			coin and token inventory.	
Drop (for kiosks) – the total amount of				Drop (for kiosks) – the total amount of gaming-
gaming instruments/financial instruments				instruments/financial instruments removed from an
removed an electronic kiosk.				electronic kiosk.
Drop (for table games) – means the total		Drop (for table games). The total amount of cash,		Drop (for table games) – means the total amount of
amount of cash, chips, and tokens removed	amount of cash, chips, and tokens removed	chips, and tokens removed from drop boxes, plus		cash, chips, coins, and tokens removed from <del>drop box</del>
from drop boxes/financial instrument	from drop boxes, plus the amount of credit	the amount of credit issued at the tables.		casino <del>financial</del> instrument storage containers
storage components, plus the amount of	issued at the tables.			c <del>omponents</del> , plus the amount of credit issued at the
credit issued at the tables.				tables.
Drop box – Drop box means a locked	<u>Drop box</u> means a locked container affixed	Drop box. A locked container affixed to the	Drop box. A locked container in which	Drop box Drop box means a locked container affixe
container affixed to the gaming table into	to the gaming table into which the drop is	gaming table into which the drop is placed. The	cash or cash equivalents are placed at	the gaming table into which the drop is placed. The g
which the drop is placed. The game type,	placed. The game type, table number, and	games type, table number, and shift are	the time of a transaction, typically	type, table number, and shift are indicated on the box
table number, and shift are indicated on the	shift are indicated on the box.	indicated on the box.	used in card games.	
hox				
Drop box contents keys – the key used to	<u>Drop box contents keys</u> means the key	Drop box contents keys. The key used to open		Drop box contents keys – the key used to open drop
open drop boxes.	used to open drop boxes.	drop boxes.		boxes.
Drop box release keys – the key used to		Drop box release keys. The key used to release		Drop box release keys – the key used to release drop
release drop boxes from tables.	to release drop boxes from tables.	drop boxes from tables.		BONES HOW CONCEST
	<u>Drop box storage rack keys</u> means the key			Drop-box storage rack keys – the key used to access
	used to access the storage rack where drop			storage rack-where-drop-boxes are secured-
1	boxes are secured. <b>Drop bucket means</b> a container located in			
	the drop cabinet (or in a secured portion of			
	the gaming machine in coinless/cashless			
	configurations) for the purpose of collecting			
	coins, tokens, cash-out tickets, and coupons			
	from the gaming machine.			
Drop cabinet – the wooden or metal base	<u>Drop cabinet</u> means the wooden or metal	Drop cabinet. The wooden or metal base of the		Drop cabinet—the wooden or metal base of the gam
of the gaming machine that contains the	base of the gaming machine that contains	gaming machine that contains the gaming		machine that contains the gaming machine drop buck
gaming machine drop bucket.	the machine drop bucket.	machine drop bucket.		
Dress marked the seried of time that	Description of the second of t	Deep period. The period of time that course		
Drop period – the period of time that		Drop period. The period of time that occurs		
occurs between sequential drops.		between sequential drops.		
Drop proceeds – the total amount of	Mav 4. 2005)	Drop proceeds. The total amount of financial	Drop proceeds. The total amount of	
financial instruments removed from drop		instruments removed from drop boxes and bill	financial instruments removed from	Drop proceeds – the total amount of financial casino
boxes and financial instrument storage		acceptor canisters.	drop boxes and financial instrument	instruments removed from drop boxes and financial-
components.			storage components.	casino instrument storage containers components.
Earned and unearned take – race bets	Earned and unearned take means race	Earned and unearned take. Race bets taken on		Earned and unearned take – race bets taken on prese
taken on present and future race events.	bets taken on present and future race events.	present and future race events. Earned take		and future race events. Earned take means bets receive
Earned take means bets received on current	Earned take means bets received on current			on current or present events. Unearned take means bei
or present events. Unearned take means	or present events. Unearned take means bets	events. Unearned take means bets taken on		taken on future race events.
bets taken on future race events.	taken on future race events.	future race events.		
		future race events.		
		future race events.		
		future race events.		
		future race events.		
		future race events.		
		future race events.		
bets taken on future race events.	taken on future race events.			
bets taken on future race events.  EPROM or programmable storage media-	taken on future race events.  EPROM means erasable programmable reac			
bets taken on future race events.  EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media.	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game			
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media. Exception report – a listing of occurrences,	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences,	Exception report. A listing of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a	occurrences, transactions or items that	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media.	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences,	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.	occurrences, transactions or items that	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB).	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a	taken on future race events.  EPROM means erasable programmable reaconly memory or other equivalent game	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media-EPROM or programmable storage media-EPROM means erasable programmable readonly memory or other equivalent game software media.  Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of	EPROM means erasable programmable read only memory or other equivalent game software media.  Fill means a transaction whereby a supply	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB), Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips,	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media-EPROM or programmable storage media-EPROM means erasable programmable read- only memory or other equivalent game software media.  Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of chips, coins, or tokens is transferred from a	EPROM means erasable programmable read only memory or other equivalent game software media.  Fill means a transaction whereby a supply	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB), Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media-EPROM or programmable storage media-EPROM means erasable programmable readonly memory or other equivalent game software media.  Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of	EPROM means erasable programmable read only memory or other equivalent game software media.  Fill means a transaction whereby a supply	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to	occurrences, transactions or items that fall outside a predetermined range of	
EPROM or programmable storage media—EPROM or programmable storage media—EPROM means erasable programmable read- only memory or other equivalent game software media.  Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	EPROM means erasable programmable read only memory or other equivalent game software media.  EILL means a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	occurrences, transactions or items that fall outside a predetermined range of	tokens is transferred from a bankroll to a table game o
EPROM or programmable storage media— EPROM or programmable storage media— EPROM means erasable programmable read- only memory or other equivalent game software media Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming	EPROM means erasable programmable read only memory or other equivalent game software media.  FILL means a transaction whereby a supply of chips, coins, or tokens is transferred from a	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	occurrences, transactions or items that fall outside a predetermined range of	tokens is transferred from a bankroll to a table game o
EPROM or programmable storage media- EPROM or programmable storage media- EPROM means erasable programmable read- only memory or other equivalent game software media. Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.  Fill slip – a document evidencing a fill.	EPROM means erasable programmable read only memory or other equivalent game software media.  EILL means a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.  Fill slip. A document evidencing a fill.	occurrences, transactions or items that fall outside a predetermined range of accentability	tokens is transferred from a bankroll to a table game of gaming machine:
EPROM or programmable storage media-EPROM or programmable storage media-EPROM means erasable programmable readonly memory or other equivalent game software media.  Exception report – a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Fill – a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.  Fill slip – a document evidencing a fill.  Financial instrument – Any tangible item of	EPROM means erasable programmable read only memory or other equivalent game software media.  EILL means a transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.	Exception report. A listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.  Financial Accounting Standards Board (FASB). Generally accepted accounting principles used by private and for-profit corporations that are not considered governmental entities. See GASB below for tribal governmental entities.  Fill. A transaction whereby a supply of chips, coins, or tokens is transferred from a bankroll to a table game or gaming machine.  Fill slip. A document evidencing a fill.  Financial instrument. Any tangible item of value	occurrences, transactions or items that fall outside a predetermined range of accentability  Financial instrument. Any tangible	tokens is transferred from a bankroll to a table game of gaming machine.  Casino Financial instrument – Any tangible item of
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CN TICS	542 NIGC Class III Guidance	543		Tribal - State Compact	OTB Compact	Other	Recommended Revisions
Section 1 - Definitions 542.1  Manufacturer name or manufacturer's logo;	542.2 BULLETIN 2018-3 (2) Manufacturer name or manufacturer's	543.1 543.2	543.3	Part 3. Definitions			
	logo;						
Ticket count; and, Prize structure, which shall include the	(3) Ticket count; and, (4) Prize structure, which shall include the						
number of winning pull tabs by	number of winning pull tabs by						
denomination, with their respective winning symbols, numbers or both.	denomination, with their respective winning symbols, numbers or both.						
Future wagers – bets on races to be run in	Future wagers means bets on races to be Future wagers. Bets on races to be run in the						Future wagers bets on races to be run in the
the future (e.g., Kentucky Derby).	run in the future (e.g., Kentucky Derby). future (e.g., Kentucky Derby).						(e.g., Kentucky Derby).
				<ol> <li>"Game play credits" means a method of representing value obtained from the exchange of cash or cash</li> </ol>			<b>Game play credits</b> - a method of representing obtained from the exchange of cash or cash e
				equivalents, or earned as a prize, in connection with			or earned as a prize, in connection with electr
				electronic gaming. Game play credits may be redeemed for cash or cash equivalents:			gaming. Game play credits may be redeemed cash equivalents:
Game server – an electronic selection	Game server means an electronic selection			<ol><li>"Central computer" means a computer to which player</li></ol>			
device, utilizing a random number generator.	device, utilizing a random number generator.			terminals are linked to allow competition in electronic bonanza-style bingo games;			
					Gaming Facility means any room or rooms	CN LA17-14 §4.K. "Gaming Facility" means any	
					where off-track bets authorized by this Compact are placed.	premises, buildings, facilities, improvements,	
						and/or equipment used or maintained in connection with the conduct of gaming,	
						including but not limited to the storage of	
						gaming equipment and/or materials and directly tied to the gaming operation/facility. This	<b>'</b>
						definition shall not include non-gaming	
						operations, even if such operations are within	
					"Gaming Operation" means the gaming	the same building as gaming operations.  CN LA 17-14 §4.U. "Nation" or "Tribe" means the	2
					authorized by the Nation within Nation's Indian		
					country by this Compact.		
					"Nation" means the Cherokee Nation, its		
					authorized officials, agents and representatives and includes Cherokee Nation Enterprises, LLC.,		
					a wholly owned tribally chartered Cherokee	'	
					limited liability company whose principal		
					function is the management of Cherokee gaming interests.		
Gaming device/component – any						CN LA17-14 §4.J. "Gaming Equipment" means al	ı
component of the gaming system, required to conduct gaming on a gaming machine or						electronic, electro-mechanical, mechanical, or other physical components utilized in the play	
technological aid used to conduct gaming						of Class II and Class III games.	
activities, which may or may not include the machine/interface itself.							
		No. of the Control of		16 (10)			
Gaming machine/player interface – the device of a gaming system that directly	Gaming machine means an electronic or electromechanical machine that allows a electromechanical machine that allows a	Player interface. Any components(s) of a Class II gaming system, including		<ol> <li>"Player terminals" means electronic or electromechanical terminals housed in cabinets with input devices and video</li> </ol>			
allows player interaction or participation in a	player to play games of chance, some of to play games of chance, some of which may be	an electronic or technologic aid (not		screens or electromechanical displays on which players play			
gaming activity.	which may be affected by skill, which contains a microprocessor with random with random number generator capability for	limitied to terminals, player stations, handhelds, fixed units, etc.), that		electronic bonanza-style bingo games, electronic instant bingo games or electronic amusement games;			
	number generator capability for outcome outcome selection or computer terminal that	directly enables player interaction in a		origo games or electionic amazement games,			
	selection or computer terminal that accesses accesses an outcome that is subsequestly and	Class II game.					
	an outcome that is subsequesntly and randomly selected in drawings that are electronically conducted by central computer or						
	electronically conducted by central computer other such methods of chance selection,						
	or other such methods of chance selection, whether mechanical or electronic. The machine is activated by the insertion of cash or cash						
	machine is activated by the insertion of cash equivalents and which awards cash, cash						
	or cash equivalents and which awards cash, equivalents, merchandise, or a written statement						
	cash equivalents, merchandise, or a written statement of the player's accumulated written statements may be redeemable for cash.						
	credits, which written statements may be						
	redeemable for cash. (Revised May 4, 2005)						
Gaming machine analysis report – a report prepared that compares theoretical to actual	Gaming machine analysis report means a Gaming machine analysis report. A report report prepared that compares theoretical to prepared that compares theoretical to actual						
old by a gaming machine on a monthly or	actual hold by a gaming machine on a hold by a gaming machine on a monthly or other						
other periodic basis.	monthly or other periodic basis. periodic basis.						
	Gaming machine booths and change Gaming machine booths and change banks. A						Gaming machine booths and change bank
	<u>banks</u> means a booth or small cage in the booth or small cage in the gaming machine area						or small cage in the gaming machine area us
	gaming machine area used to provide used to provide change to players, store change aprons and aprons and extra coin, and account for jackpot						provide change to players, store change apro- coin, and account for jackpot and other payo
	extra coin, and account for jackpot and other and other payouts.						3 , 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1
	Gaming machine count means the total						Gaming machine count - the total amount
	amount of coins, tokens, and cash removed						removed from a gaming machine. The amou
	from a gaming machine. The amount counted is entered on the Gaming Machine						entered on the Gaming Machine/Soft Count considered the drop.
	Count Sheet and is considered the drop.						·
	Also, the procedure of counting the coins, tokens, and cash or the process of verifying						
	gaming machine coin and token inventory.						
	gaming machine coin and token inventory.						
	Gaming machine pay table means the						
combinations illustrated on the face of the	Gaming machine pay table, means the reel strip combinations illustrated on the face						
Gaming machine pay table – the reel strip combinations illustrated on the face of the gaming machine that can identify payouts of designated coin amounts.	Gaming machine pay table means the						

CN TICS Section 1 Definitions 543	542	NIGC Class III Guidance	E43.4	543	F42 5	Tribal - State Compact	OTB Compact	Other	Recommended Revisions
Section 1 - Definitions 542	.1 542.2	BULLETIN 2018-3	543.1	543.2	543.3	Part 3. Definitions			Enterprise the tribe as the tribe leaves
						13. "Enterprise" means the tribe or the tribal agency or			Enterprise - the tribe or the tribal agency or se
						section of tribal management with direct responsibility for			tribal management with direct responsibility fo
						the conduct of covered games, the tribal business enterprise			conduct of gaming, or the tribal business enter
						that conducts covered games, or a person, corporation or			conducts gaming.
						other entity that has entered into a mangement contract with			
						the tribe to conduct covered games, in accordance with			
						IGRA. The names, addresses and identifying information of			
						any covered game employees shall be forwarded to the SCA			
						at least annually. In any event, the tribe shall have the			
						ultimate responsibility for ensuring that the tribe or			
						enterprise fulfills the responsibilities under this Compact. For			
						purposes of enforcement, the tribe is deemed to have made			
						all promises for the enterprise;			
						14. "Facility" means any building of the tribe in which covered			Facility - any building of the tribe in which co
						authorized by this Compact are conducted by the enterprise,			authorized by this Compact are conducted by
						located on Indian lands as defined by IGRA. The tribe shall			enterprise, located on Indian lands as defined
						have the ultimate responsibility for ensuring that a facility			The tribe shall have the ultimate responsibili
						confroms to the Compact as required herein;			ensuring that a facility confroms to the Com
	Gaming operation accounts receivable								Gaming operation accounts receivable (fo
	(for gaming operation credit) means credit								operation credit) - credit extended to gamin
	extended to gaming operation customers in								customers in the form of markers, returned c
	the form of markers, returned checks, or								other credit instruments that have not been
									other credit instruments that have not been
	other credit instruments that have not been								
	repaid.								
ming promotion - Any promotional				Gaming promotion. Any promotional					
ivity or award that requires game play as				activity or award that requires game					
ondition of eligibility.				play as a condition of eligibility.					
Statuon of engionity.				play as a condition of eligibility.					
ning system – any system used to				Class II Gamina System All				CN LA 17-14 §4.N. "Gaming System" means all	Gaming system - all components whether o
ming system – any system used to nduct gaming on a gaming machine or				Class II Gaming System. All					
				components, whether or not				components, whether or not technologic aids in	
hnological aid used to conduct gaming				technologic aids in electronic,				electronic, computer, mechanical, or other	other technologic form, that function togeth
ivities, inclusive of any and all support				computer, mechanical, or other				technologic form, that function together to aid	
tems (both hardware and software).				technologic form, that function				the play of one or more Class II games or any	inclusive of any and all support systems, play
				together to aid the play of one or				Class III games, inclusive of any and all support	
				more Class II fames, including				systems, player tracking and gaming accounting	9
				accounting functions mandated by				functions.	
				these regulations or part 547 of this					
				chapter.					
				Voucher system. A financial					
				instrument of fixed wagering value,					
				usually paper, that can be used only to					
				acquire an equivalent value of					
				cashable credits or cash through					
				_					
				interaction with a voucher system.					
enerally Accepted Accounting		Generally Accepted Accounting Principles		Generally Accepted Accounting					Generally Accepted Accounting Principles
inciples (GAAP) - A widely accepted set		(GAAP). A widely accepted set of rules,		Principles (GAAP). A widely accepted					widely accepted set of rules, conventions, sta
rules, conventions, standards, and		conventions, standards, and procedures for		set of rules, conventions, standards,					procedures for reporting financial informatio
ocedures for reporting financial		reporting financial information, as established by		and procedures for reporting financial					established by the Financial Accounting Stan
formation, as established by the Financial		the Financial Accounting Standards Board		information, as established by the					(FASB), including, but not limited to, the Aud
ccounting Standards Board (FASB),		(FASB), including, but not limited to, the		Financial Accounting Standards Board					Accounting Guide for Gaming the standards
cluding, but not limited to, the standards		standards for casino accounting published by the		(FASB), including, but not limited to,					accounting published by the American Institu
r casino accounting published by the		American Institute of Certified Public		the standards for casino accounting					Certified Public Accountants (AICPA).
merican Institute of Certified Public		Accountants (AICPA).		published by the American Institute of					
countants (AICPA).				Certified Public Accountants (AICPA).					
enerally Accepted Auditing Standards		Generally Accepted Auditing Standards (GAAS).		Generally Accepted Auditing Standards					
AAS) - A widely accepted set of standards		A widely accepted set of standards that provide a		(GAAS). A widely accepted set of					
at provide a measure of audit quality and		measure of audit quality and the objectives to be		standards that provide a measure of					
objectives to be achieved in an audit, as		achieved in an audit, as established by the		audit quality and the objectives to be					
ablished by the Auditing Standards Board		Auditing Standards Board of the American		achieved in an audit, as established by					
the American Institute of Certified Public		Institute of Certified Public Accountants (AICPA).							
countants (AICPA).		institute of Certified Fublic Accountants (AICPA).		the Auditing Standards Board of the American Institute of Certified Public					
ountains (MICFA).									
				Accountants (AICPA).					
vernmental Accounting Standards		Governmental Accounting Standards Board		Governmental Accounting Standards					
ard (GASB) - Generally accepted		(GASB). Generally accepted accounting		Board (GASB). Generally accepted					
ounting principles used by state and		principles used by state and local governments.		accounting principles used by state					
Il governments.		pp.es used by state and local governments.		and local governments.					
a governments.				and local governments.					
ss gaming revenue – annual total	Gross aamina revenue means annual total	Gross gaming revenue. The win from gaming							
ount of cash wagered on Class II and	amount of cash wagered on Class II and Class								
ss III games and admission fees		gaming wins and losses before deducting costs							
luding table or card fees), less any		and expenses (See Win). Annual total amount of							
ounts paid out as prizes or paid for prizes		cash wagered on class II and class III games and							
rded.		admission fees (including table or card fees), less							
		any amounts paid out as prizes or paid for prizes							
		awarded.							
d – the relationship of win to coin-in for	Hold means the relationship of win to coin-	Hold. The relationship of win to coin-in for		+				<u> </u>	1
ning machines and win to drop for table		gaming machines and win to drop for table							
nes.	table games.	names							
nes.  b – the person or entity that is licensed		Hub. The person or entity that is licensed to		+				<u> </u>	Hub the person or entity that is licensed to
provide the operator of a pari-mutuel		provide the operator of a pari-mutuel wagering							operator of a pari mutuel wagering operatio
gering operation information related to	= = :	operation information related to horse racing							related to horse racing that is used to determ
se racing that is used to determine	related to horse racing that is used to	that is used to determine winners of races or							of races or payoffs on wagers accepted by the
ners of races or payoffs on wagers		payoffs on wagers accepted by the pari-mutuel							mutuel wagering operation.
epted by the pari-mutuel wagering		wagering operation.							
eration.	wagering operation.								
lependent – The separation of functions		Independent. The separation of functions to		Independent. The separation of					
ensure that the agent or process		ensure that the agent or process monitoring,		functions to ensure that the agent or					
nitoring, reviewing, or authorizing the		reviewing, or authorizing the controlled activity,		process monitoring, reviewing, or					
strolled activity, function, or transaction is		function, or transaction is separate from the		authorizing the controlled activity,					
	1	agents or process performing the controlled		function, or transaction is separate					
parate from the agents or process		_							
parate from the agents or process forming the controlled activity, function,		activity, function, or transaction.		from the agents or process performing					
parate from the agents or process efforming the controlled activity, function, transaction.		activity, function, or transaction.		from the agents or process performing the controlled activity, function, or					

REF CN TICS Section 1 - Definitions	542.1 542.1	542.2	NIGC Class III Guidance BULLETIN 2018-3	543.1	543 543.2	543.3	Tribal - State Compact Part 3. Definitions	OTB Compact	Other	Recommended Revisions
Section 1 - Definitions	542.1	542.2	BULLETIN 2018-3	543.1	543.2	543.3	17. "Independent testing laboratory" means a laboratory of			Independent testing laboratory - a laboratory of
							national reputation that is demonstrably competent and			national reputation that is demonstrably competent and
							qualified to scientifically test and evaluate devices for			qualified to scientifically test and evaluate devices for compliance with established applicable technical
							compliance with this Compact and to otherwise perform the functions assigned to it in this Compact. An independent			standards. with this Compact and to otherwise perform-
							testing laboratory shall not be owned or controlled by the			the functions assigned to it in this Compact. An
							tribe, the enterprise, an organizational licensee as defined in			independent testing laboratory shall meet the provisions
							the State-Tribal Gaming Act, the state, or any manufacturer,			required under 25 CFR 547 and Tribal Gaming Compact
							supplier or operator of gaming devices. The selection of an independent testing laboratory for any purpose under this			provisions. not be owned or controlled by the tribe, the enterprise, an organizational licensee as defined in the
							Compact shall be made from a list of one or more			State-Tribal Gaming Act, the state, or any manufacturer,
							laboratories mutually agreed upon by the parties; provided			supplier or operator of gaming devices. The selection of
							that the parties hereby agree that any laboratory upon which			an independent testing laboratory for any purpose under
							the National Indian Gaming Commission has relied for such testing may be utilized for testing required by this Compact;			this Compact shall be made from a list of one or more- laboratories mutually agreed upon by the parties;
							testing may be dailized for testing required by this compact,			provided that the parties hereby agree that any laborator
										upon which the National Indian Gaming Commission has
										relied for such testing may be utilized for testing required
										by this Compact;
							18. "IGRA" means the Indian Gaming Regulatory Act,	Act means the Indian Gaming Regulatory Act,	CN LA 17-14 §4.P. "IGRA" means the Indian	IGRA - Indian Gaming Regulatory Act,
								Pub. L. 100-497, Oct. 17, 1988, 102 Stat. 2467	Gaming Regulatory Act of 1988, Public Law 100	-
								codified at 25 U.S.C. §2701 et seq., 18 U.S.C.	497, as codified at 25 U. S. C. §2701 et. Seq., as amended.	
Internal audit – persons who perform an	Internal audit me	neans persons who perform Inte	rnal audit. Persons who perform an audit					§1166 to 1168.	amended.	
audit function of a gaming operation that			ction of a gaming operation that are							
are independent of the department subject			ependent of the department subject to audit.							
to audit. Independence is obtained through the organizational reporting relationship, as			ependence is obtained through the anizational reporting relationship, as the							
the organizational reporting relationship, as the internal audit department shall not			rnal audit department shall not report to							
report to management of the gaming			nagement of the gaming operation. Internal							
operation. Internal audit activities should be	Internal audit activi	ivities should be conducted aud	it activities should be conducted in a manner							
conducted in a manner that permits			permits objective evaluation of areas							
objective evaluation of areas examined.  Internal audit personnel may provide audit			mined. Internal audit personnel may provide it coverage to more than one operation							
coverage to more than one (1) operation		-	nin a Tribe's gaming operation holdings.							
within a tribe's gaming operation holdings.	operation holdings		3 5 F							
	Issue slip means a		e slip. A copy of a credit instrument that is							Issue slip - a copy of a credit instrument that is retained
	instrument that is a sequence control p		ined for numerical sequence control poses.							for numerical sequence control purposes.
Jackpot payout – Jackpot payout means			spot prize payout. The portion of a jackpot							Jackpot payout – Jackpot payout means the portion of a
the portion of a jackpot paid by gaming	jackpot paid by gar	aming machine personnel. paid	by gaming machine personnel. The amount							jackpot paid by gaming machine personnel. The amount
machine personnel. The amount is usually			sually determined as the difference between							is usually determined as the difference between the total
determined as the difference between the total posted jackpot amount and the coins			total posted jackpot amount and the amount I out by the machine. May also be the total							posted jackpot amount and the coins paid out- accumulated credit paid by the machine. May also be the
paid out by the machine. May also be the		o be the total amount of the am								total amount of the jackpot.
total amount of the jackpot.	jackpot.									
Kiosk – a device capable of redeeming					Kiosk. A device capable of redeeming					
vouchers and/or wagering credits or					vouchers and/or wagering credits or					
initiating electronic transfers of money to or					initiating electronic transfers of money					
from a patron deposit account.					to or from a patron deposit account.					
Lammer – a type of chip that is placed on a	<u>Lammer button</u> n	means a type of chip that Lan	imer button. A type of chip that is placed on							
gaming table to indicate that the amount of			aming table to indicate that the amount of							
chips designated thereon has been given to			os designated thereon has been given to the							
the customer for wagering on credit before completion of the credit instrument.			comer for wagering on credit before appletion of the credit instrument. Lammer							
Lammer button may also mean a type of			ton may also mean a type of chip used to							
chip used to evidence transfers between			lence transfers between table banks and card							
table banks and card room banks.	between table ban	inks and card room banks. roo	m banks.							
			es of credit. The privilege granted by a		Lines of credit. The privilege granted					Lines of credit - the privilege granted by a gaming
			ning operation to a patron to: (1) Defer ment of debt; or (2) Incur debt and defer its		by a gaming operation to a patron to: (1) Defer payment of debt; or					operation to a patron to: (1) Defer payment of debt; or
			ment under specific terms and conditions.		(2) Incur debt and defer its payment					(2) Incur debt and defer its payment under specific terms
			·		under specific terms and conditions.					and conditions.
Linked electronic game – any game linked		c game means any game		<del></del>						
to two (2) or more gaming operations that		or more gaming operations								
are physically separate and not regulated by the same Tribal gaming regulatory authority.		y separate and not regulated al gaming regulatory								
	authority									
Main card room bank – a fund of cash,		bank means a fund of								
coin, and chips used primarily for poker and pan card game areas. It is used to make		nips used primarily for poker ne areas. Used to make even								
even cash transfers between various games		tween various games as								
as needed. It may be used similarly in other		used similarly in other areas								
areas of the gaming operation.	of the gaming ope	peration.								
Manual payout – any non-automated		Ma	nual payout. Any non-automated payout.		Manual payout. Any non-automated					
payout.					payout.					
Marker -A document, signed by the patron,			ker. A document, signed by the customer,		Marker. A document, signed by the					
evidencing an extension of credit to him or promising to repay credit issued by the			lencing an extension of credit to him by the ning operation.		patron, promising to repay credit issued by the gaming operation.					
gaming operation.	the gaming operat	ation.			3 5 5 mm					
		ay means that players are								Marker credit play - players are allowed to purchase
	allowed to purchas form of a market.	ase chips using credit in the								chips using credit in the form of a market.
		y form means a form								Marker inventory form - a form maintained at table
		ole games or in the gaming								games or in the gaming operation pit that are used to
		t are used to track marker individual table or pit.								track marker inventories at the individual table or pit.
	inventories at the i	andividual table of pit.								
			ker transfer form. A form used to document	-						Marker transfer form - a form used to document
		ers of markers from the pit tran	sfers of markers from the pit to the cage.							transfers of markers from the pit to the cage.
	to the cage.  Master credit reco	cord means a form to			1					Master credit record - a form to record the date, time,
		time, shift, game, table,								shift, game, table, amount of credit given, and the
	amount of credit g	given, and the signatures or								signatures or initials of the persons extending the credit.
	initials of the person	sons extending the credit.								
Master game program number – the	Master game prog	ogram number means the Ma	ster game program. The game program							
game program number listed on a gaming	game program nur	umber listed on a gaming nur	nber listed on a gaming machine EPROM.							1
machine EPROM.	machine EPROM.					Page 8 of 12		1	_1	

REF	CN TICS	542		NIGC Class III Guidance		543		Tribal - State Compact	OTB Compact	Other	Recommended Revisions
KEF	Section 1 - Definitions	542.1	542.2	BULLETIN 2018-3	543.1	543.2	543.3	Part 3. Definitions	OTB Compact	Other	Recommended Revisions
Ma	laster game sheet – a form used to			Master game sheet. A form used to record, by	515.2	31312	3.13.3	Turt 5. Definitions			
	cord, by shift and day, each table game's		ft and day, each table game's	shift and day, each table game's winnings and							
	innings and losses. This form reflects the		losses. This form reflects the	losses. This form reflects the opening and closing							
	pening and closing table inventories, the		closing table inventories, the	table inventories, the fills and credits, and the							
fills	Is and credits, and the drop and win.	fills and credits	ts, and the drop and win.	drop and win.							
	leter – an electronic (soft) or mechanical		s an electronic (soft) or	Meter. An electronic (soft) or mechanical (hard)							
	ard) apparatus in a gaming machine. May		ard) apparatus in a gaming	apparatus in a gaming machine. May record the							
	cord the number/amount of credits agered, the number/amount of cash or		record the number of coins number of coins dropped, the	number of coins wagered, the number of coins dropped, the number of times the handle was							
	ash equivalents dropped, the number of		nes the handle was pulled, or	pulled, or the number of coins paid out to							
	mes the handle was pulled, or the		f coins paid out to winning	winning players.							
	umber/amount of credits paid out to	players.	r coms paid out to winning	willing players.							
	inning players.	players.									
	IICS – Minimum Internal Control Standards		minimum internal control	MICS. Minimum internal control standards.		MICS . Minimum Internal Control					
	romulgated by the NIGC.	standards in th				Standards in this part.					
	lotion activated dedicated camera – a		ated dedicated camera	Motion activated dedicated camera. A video							
	deo camera that, upon its detection of		eo camera that, upon its	camera that, upon its detection of activity or motion in a specific area, begins to record the							
	ctivity or motion in a specific area, begins record the activity or area.		ctivity or motion in a specific o record the activity or area.	activity or area.							
101	record the activity of area.	area, begins to	o record the activity of area.	activity of area.							
Mu	lulti-game machine – a gaming machine	Multi-game n	machine means a gaming	Multi-game machine. A gaming machine that							
	at includes more than one (1) type of			includes more than one type of game option.							
gar	ame option.	game option.									
				Multi-race ticket. A keno ticket that is played in							Multi-race ticket - a keno ticket that is played in multi
		played in multi	tiple games.	multiple games.						IIGPA 2703(9) The term "net revenues" means	games.
										gross revenues of an Indian gaming activity less	Net revenues - gross revenues of an Indian gaming activity less amounts paid out as, or paid for, prizes and
										amounts paid out as, or paid for, prizes and total	total operating expenses, excluding management fees.
										operating expenses, excluding management	total operating expenses, excluding management fees.
										fees.	
Ne	etwork communication equipment – a			Network communication equipment. A device		Network communication equipment.					
	evice or collection of devices that controls			or collection of devices that controls data		A device or collection of devices that					
	ata communication in a system including,			communication in a system including, but not		controls data communication in a					
	ut not limited to, cables, switches, hubs,			limited to, cables, switches, hubs, routers,		system including, but not limited to,					
	outers, wireless access points, landline			wireless access points, landline telephones and		cables, switches, hubs, routers, wireless					
	lephones and cellular telephones.			cellular telephones.		access points, landline telephones and					
						cellular telephones.					
NIT	IGC – National Indian Gaming	Commission	means the National Indian			Commission. The National Indian	CN LA 17-14 §4.V. "NIGC" means the		Commission means the National Indian Gaming		+
	ommission.	Gaming Comm				Gaming Commission, established by	National Indian Gaming Commission.		Commission established pursuant to 25 U.S.C.		
Co	on mission.	Garning Cornir	111331011.			the Indian Gaming Regulatory Act, 25	reational Indian Gaming Commission.		§2704.		
						U. S. C. 2701 et sea.			32701.		
On	n-line gaming machine monitoring – a	On-line gamii	ing machine monitoring	On-line gaming machine monitoring. A system							
sys	stem used by a gaming operation to	<u>system</u> mean	ns a system used by a gaming	used by a gaming operation to monitor gaming							
	onitor gaming machine meter readings			machine meter readings and/or other activities							
and	nd/or other activities on an on-line basis.	readings and/o	or other activities on an on-line	on an on-line basis.							
$\vdash$		hasis	m						+		-
				Order for credit. A form that is used to request							Order for credit - a form that is used to request the
			transfer of chips or markers	the transfer of chips or markers from a table to							transfer of chips or markers from a table to the cage. Th
				the cage. The order precedes the actual transfer							order precedes the actual transfer transaction that is
			nsfer transaction that is	transaction that is documented on a credit slip.							documented on a credit slip.
		documented o	on a credit slip.								
		Outstation me	neans areas other than the main								
			ere bets may be placed and								
		tickets paid.									
	ar percentage – the percentage of each	Par percentag	ge means the percentage of	Par percentage. The percentage of each dollar							
dol	ollar wagered that the house wins (i.e.,	each dollar wa	agered that the house wins (i.e.,	wagered that the house wins (i.e., gaming							
gar	aming operation advantage).	gaming operat	ition advantage).	operation advantage).							
	ar sheet – a specification sheet for a			Par sheet. A specification sheet for a gaming							
	aming machine that provides machine			machine that provides machine hold percentage,							
	old percentage, model number, hit equency, reel combination, number of			model number, hit frequency, reel combination,							
	els, number of coins that can be accepted,			number of reels, number of coins that can be accepted, and reel strip listing.							
	nd reel strip listing	licting	be accepted, and reer strip	accepted, and reer strip listing.							
	ari-mutuel wagering – a system of	Pari-mutuel w	wagering means a system of	Pari-mutuel wagering. A system of wagering on					Off-Track Betting means Pari-Mutuel betting on		Pari-mutuel/off-track betting wagering – a system of
	agering on horse races, jai-alai, greyhound			horse races, jai-alai, greyhound, and harness					races into an interstate common Pari-Mutuel		wagering on horse races, jai-alai, greyhound and harne
	nd harness racing, where the winners			racing, where the winners divide the total					pool consisting of the Pari-Mutuel wagers		racing, on races, where bets are placed into an intersta
	vide the total amount wagered, net of		unt wagered, net of	amount wagered, net of commissions and					placed at track(s), its intrastate betting locations,		common Pari-Mutuel pool consisting of the Pari-Mutu
cor	ommissions and operating expenses,	commissions a	and operating expenses,	operating expenses, proportionate to the					other jurisdictions, and the Pari-Mutuel wagers		wagers placed at track(s), intrastate betting locations,
pro	roportionate to the individual amount	proportionate	to the individual amount	individual amount wagered.					placed at the Nation Gaming Facilities		other jurisdictions, and Pari-Mutuel wagers placed at
wa	agered.	wagered.							authorized by this Compact.		Cherokee Nation gaming facilities (where authorized b
											OTB Compact), where the winners divide the total
											amount wagered, net of commissions and operating
											expenses, proportionate to the individual amount
											wagered. Definitions related to Pari-Mutuel wagering ca
											be found in Section 10 - Pari-Mutuel.
											<u> </u>
Pat	atron – any person who is a customer or					Patron. A person who is a customer		20. "Patron" means any person who is on the premises of a		CN LA 17-14 §4.M. "Gaming Public" or "Patron"	
	uest of the gaming operation and may					or guest of the gaming operation and		gaming facility, for the purpose of playing covered games		means any natural person that is on the	
	teract with games. Also may be referred					may interact with a Class II game. Also		authorized by this Compact;		premises of a gaming facility acting or serving in	
to a	as a "player" or "customer."					may be referred to as a "player."				the capcity as a customer or guest for the	
D-4	etron denosit account			Patron deposit account. An account maintained		Patron denosit account An account		+	+	nurnose of gaming	<u> </u>
	atron deposit account – an account aintained on behalf of a patron, for the			Patron deposit account. An account maintained on behalf of a patron, for the deposit and		Patron deposit account. An account maintained on behalf of a patron, for					
	eposit and withdrawal of funds for the			withdrawal of funds for the primary purpose of		the deposit and withdrawal of funds					
	rimary purpose of interacting with a aming activity.			interacting with a gaming activity.		for the primary purpose of interacting with a gaming activity.					
gai	aning activity.					with a gaming activity.					
Pay	ayment slip – part of a marker form on	Payment slip	means that part of a marker	Payment slip. Part of a marker form on which	·						
	hich customer payments are recorded.		customer payments are	customer payments are recorded.							
		recorded.									<u> </u>
	ayout – a transaction associated with a			Prize payout. A payment to a player associated							
	inning event.	a winning ever	nt.	with a winning or qualifying event.							
	(N – the personal identification number	DIAL	the personal identification	DIN. The personal identification assets				+	+		<u> </u>
wir			the personal identification	PIN. The personal identification number used to							
wir PIN		number used t	to access a player's account.	access a patron deposit account.							
wir PIN	sed to access player's account.			Pit podium. A stand located in the middle of the				+	1		Pit podium - a stand located in the middle of the table
wir PIN		Die no di	neans a stand located in the			i i	I .	1		1	pourum a stand located in the middle of the table
wir PIN			neans a stand located in the	1 1							used by gaming operation supervisory personnel as a
wir PIN		middle of the t	tables used by gaming	tables used by gaming operation supervisory							
wir PIN		middle of the t operation supe	tables used by gaming pervisory personnel as a	1 1							used by gaming operation supervisory personnel as a workspace and record storage area.
PIN use		middle of the t operation supe workspace and	tables used by gaming pervisory personnel as a d record storage area.	tables used by gaming operation supervisory							used by gaming operation supervisory personnel as a workspace and record storage area.

CN TICS           Section 1 - Definitions         542.1	542 NIGC Class III Guidance 542.2 BULLETIN 2018-3	543 543.1 543.2	Tribal - State Compact  543.3 Part 3. Definitions	OTB Compact	Other Recommended Revisions
Player tracking system – a system typically	Player tracking system means a system Player tracking system. A system typically used	343.1 343.2	545.5 Part 5. Definitions		Player tracking system – a system typically used i
used in gaming departments that can	typically used in gaming machine in gaming machine departments that can record				gaming departments that can record the gaming a
record the gaming activity of individual	departments that can record the gaming the gaming machine play of individual				of individual patrons <del>customers</del> .
customers.	machine play of individual customers.				
Post time – the time when a pari-mutuel	Post time_means the time when a pari- Post time. The time when a pari-mutuel track				Post time – the time when a pari-mutuel track sto
track stops accepting bets in accordance	mutuel track stops accepting bets in stops accepting bets in accordance with rules				accepting bets in accordance with rules and regul
with rules and regulations of the applicable	accordance with rules and regulations of the and regulations of the applicable jurisdiction.				of the applicable jurisdiction.
jurisdiction.	applicable jurisdiction.				
Primary and secondary jackpots – promotional pools offered at certain card	Primary and secondary jackpots means promotional pools offered at certain card				
games that can be won in addition to the	games that can be won in addition to the				
primary pot.	primary pot.				
Prize payouts – payment to a player		Prize payout. Payment to a player			
associated with a winning or qualifying		associated with a winning or qualifying			
Progressive gaming machine – a gaming	Progressive gaming machine means a Progressive gaming machine. A gaming	event.			
machine, with a payoff indicator, in which	gaming machine, with a payoff indicator, in machine, with a payoff indicator, in which the				
the payoff increases as it is played (i.e.,	which the payoff increases as it is played (i.e., payoff increases as it is played (i.e., deferred				
deferred payout). The payoff amount is	deferred payout). The payoff amount is payout). The payoff amount is accumulated,				
accumulated, displayed on a machine and will remain until a player lines up the jackpot	accumulated, displayed on a machine and will displayed on a machine and will remain until a remain until a player lines up the jackpot to player lines up the jackpot symbols that result in				
symbols that result in the progressive	symbols that result in the progressive the progressive amount being paid.				
amount being paid.	amount being paid.				
Progressive jackpot – deferred payout from a progressive gaming machine.	Progressive jackpot means deferred Progressive jackpot. Deferred payout from a progressive gaming machine.				
, .,, ., .,	, y				
	Progressive table game means table games Progressive table game. Table games that offer				Progressive table game - table games that off
	that offer progressive jackpots. progressive jackpots.				progressive jackpots.
Promotional payout – merchandise or	Promotional payout means merchandise Promotional payout. Merchandise or awards				
awards given to players by the gaming	or awards given to players by the gaming given to players by the gaming operation based				
operation based on a wagering activity.	operation based on a wagering activity. on a wagering activity.				
December of the second of the	December and acceptance with and for	Drawatianal arrayasina acts and/or			
Promotional progressive pots and/or pools – funds contributed to a table game	Promotional progressive pots and/or pools means funds contributed to a table	Promotional progressive pots and/or pools. Funds contributed to a table			
or card game by and for the benefit of	game or card game by and for the benefit of	game or card game by and for the			
players. Funds are distributed to players	players. Funds are distributed to players	benefit of players. Funds are			
based on a predetermined event.	based on a predetermined event. (Revised	distributed to players based on a			
	May 5, 2005)  Rabbit ears means a device, generally V - Rabbit ears. A device, generally V-shaped, that	nredetermined event			
	shaped, that holds the numbered balls holds the numbered balls selected during a keno				
	selected during a keno or bingo game so that or bingo game so that the numbers are visible to				
	the numbers are visible to players and players and employees.				
Rake – a commission charged by the house	employees  Rake means a commission charged by the				
for maintaining or dealing a game such as	house for maintaining or dealing a game				
poker.	such as poker.				
Rake circle – the area of a table where a rake is placed.	Rake circle means The area of a table where a rake is placed.				
Random number generator – a device that	Random number generator means a Random number generator. A device that				Random number generator – a device that gen
generates numbers in the absence of a	device that generates numbers in the generates numbers in the absence of a pattern.				numbers in the absence of a pattern. May be us
pattern. May be used to determine	absence of a pattern. May be used to May be used to determine numbers selected in				determine numbers selected in various games si
numbers selected in various games such as	determine numbers selected in various various games such as keno and bingo. Also				bingo and keno. Also commonly used in gaming
bingo. Also commonly used in gaming machines to generate game outcome.	games such as keno and bingo. Also commonly used in gaming machines to generate game outcome.				machines to generate game outcome.
	generate game outcome				
Reel symbols – symbols listed on reel strips	Reel symbols isted on reel Reel symbols. The symbols listed on reel strips				
of display on gaming machines.	strips of display on gaming machines. of gaming machines.				
	Rim credit means extensions of credit that Rim credit. Extensions of credit that are not				Rim credit - extensions of credit that are not ev
	are not evidenced by the immediate evidenced by the immediate preparation of a				by the immediate preparation of a marker and d
	preparation of a marker and does not include marker and does not include call bets.				include call bets.
	call hets		22. "Rules and regulations" means the rules and regulations		Rules and regulations - the rules and regulatio
			promulgated by the Tribal Compliance Agency for		promulgated by the CNGC.
			implementation of this Compact;		
Runner – a gaming employee who	Runner means a gaming employee who Runner. A gaming employee who transports				
transports chips/cash to or from a gaming	transports chips/cash to or from a gaming chips/cash to or from a gaming table and a				
table and a cashier.  SAM – a screen-automated machine used	table and a cashier. cashier.  SAM means a screen-automated machine				SAM a screen automated machine used to ac
to accept pari-mutuel wagers. SAMs also	used to accept pari-mutuel wagers. SAM's				mutuel wagers. SAMs also pay winning tickets in
pay winning tickets in the form of a voucher,	also pay winning tickets in the form of a				of a voucher, which is redeemable for cash.
which is redeemable for cash.	voucher, which is redeemable for cash.				
	Series number means the unique identifying				Series number -the unique identifying number
	number printed on each sheet of bingo				on each sheet of bingo paper that identifies the
	paper that identifies the bingo paper as a				paper as a series or packet. The series number i
	series or packet. The series number is not the				free space or center space number located on t
	free space or center space number located				paper.
	on the bingo paper, (Adopted May 4, 2005)				
Shift – a time period, unless otherwise	Shift. means an eight-hour period, unless Shift. An eight-hour period, unless otherwise	Shift. A time period, unless otherwise			
	otherwise aproved by the Tribal gaming approved by the Tribal gaming regulatory	approved by the tribal gaming			
approved by CNGC, not to exceed 24 hours.	regulatory authority, not to exceed twenty- authority, not to exceed twenty-four (24) hours.	authority, not to exceed 24 hours.			
		The state of the s			
approved by CNGC, not to exceed 24 hours.	four (24) hours.	Shill. An agent financed by the			Shill – an agent financed by the house and activ
		Shill. An agent financed by the gaming operation and acting as a			<b>Shill</b> – an agent financed by the house and acti player for the purpose of starting or maintainin

	P.40		MCCCI W.C. id				77-1 6-4 6	OVD C	Oth	December ded Decisions
CN TICS Section 1 - Definitions	542 542.1	542.2	NIGC Class III Guidance BULLETIN 2018-3	543.1	543 543.2	543.3	Tribal - State Compact  Part 3. Definitions	OTB Compact	Other	Recommended Revisions
SICS (System of Internal Control	3.2.2	J-12.2	SICS (System of Internal Control Standards). An	515.2	SICS (System of Internal Control	545.5	Tut 3. Definitions			
Standards) – an overall operational			overall operational framework for a gaming		Standards). An overall operational					
framework for a gaming operation that			operation that incorporates principles of		framework for a gaming operation that					
incorporates principles of independence			independence and segregation of function, and		incorporates principles of					
and segregation of function, and is			is comprised of written policies, procedures, and		independence and segregation of					
comprised of written policies, procedures			standard practices based on overarching		function, and is comprised of written					
and standard practices based on			regulatory standards specifically designed to		policies, procedures and standard					
overarching regulatory standards specifically			create a system of checks and balances to		practices based on overarching					
designed to create a system of checks and			safeguard the integrity of a gaming operation		regulatory standards specifically					
balances to safeguard the integrity of a			and protect its assets from unauthorized access,		designed to create a system of checks					
gaming operation and protect its assets			misappropriation, forgery, theft, or fraud.		and balances to safeguard the					
from unauthorized access, misappropriation,					integrity of a gaming operation and					
forgery, theft, or fraud.					protect its assets from unauthorized					
					access, misappropriation, forgery,					
					theft, or fraud.					
Smart card – a card with embedded			Smart card. A card with embedded integrated		Smart card. A card with embedded					
integrated circuits that possesses the sole			circuits that possesses the means to		integrated circuits that possesses the					
means to electronically store or retrieve			electronically store or retrieve account data.		means to electronically store or					
account data.					retrieve account data.					
Soft count –means the count of the			ts Soft count. The count of the contents in a drop							Soft count —means the count of the contents in a
contents in a drop box/financial instrument	in a drop bo	ox or a bill acceptor canister.	box or a bill acceptor canister.							drop box/financial-instrument storage container
storage component.							24. "State" means the State of Oklahoma	State means the State of Oklahoma, its		State - the State of Oklahoma and/or its authorize
							24. State means the state of Oklahoma	authorized officials, agents, and representatives.		officials, agents, and representatives.
								addionaged officials, agents, and representatives.		ometals, agents, and representatives.
State Compliance Agency - means the							25. "State Compliance Agency" ("SCA") means the state			State Compliance Agency (SCA) - means the sta
state agency that has the authority to carry							agency that has the authority to carry out the state's			agency that has the authority to carry out the stat
out the state's oversight responsibilities							oversight responsibilities under this Compact, which shall be			oversight responsibilities under theis Compact, wh
under this Compact, which shall be the							the Office of State Finance or its successor agency.			shall be the Office of State Finance or its successor
Office of State Finance or its successor										agency.
agency										
Statistical drop – total amount of money,		drop means total amount of	Statistical drop. The total amount of money,							Statistical drop – total amount of money, chips a
chips and tokens contained in the drop		os and tokens contained in the	chips and tokens contained in the drop boxes,							tokens contained in the drop boxes/financial casi
boxes/financial instrument storage		plus credit issued, minus pit	plus pit credit issued, minus pit credit payments							instrument storage <del>components</del> containers, plus
components, plus credit issued, minus pit		ents in cash in the pit. (Adopted	in cash in the pit.							issued, minus pit credit payments in cash in the p
credit payments in cash in the pit.	May 11, 200	06)								
Statistical win slosing bankroll plus	Statistical	win magne closing bankroll plu	s Statistical win. The closing hankfull, plus, credit							<del>-  </del>
Statistical win – closing bankroll, plus credit slips for cash, chips or tokens			us Statistical win. The closing bankroll, plus credit di slips for cash, chips or tokens returned to the							
			cage, plus drop, minus opening bankroll, minus							
returned to the cage, plus drop, minus opening bankroll, minus fills to the table,		plus drop, minus opening	r fills to the table, plus marker credits.							
			fills to the table, plus marker credits.							
plus marker credits.	credits. (Ad	lopted May 11, 2006)								
Sufficient clarity – The capacity of a	Sufficient c	clarity means use of monitoring	Sufficient clarity. The capacity of a surveillance		Sufficient clarity. The capacity of a					
surveillance system to record images at a		ng at a minimum of twenty (20)			surveillance system to record images					
minimum of 20 frames per second or		second. Multiplexer tape	frames per second or equivalent recording speed		at a minimum of 20 frames per second					
equivalent recording speed and at a		are insufficient to satisfy the	and at a resolution sufficient to clearly identify		or equivalent recording speed and at a					
resolution sufficient to clearly identify the		t of sufficient clarity.	the intended activity, person, object, or location.		resolution sufficient to clearly identify					
intended activity, person, object, or location.	·	•			the intended activity, person, object, or					
Multiplexer tape recordings are insufficient					location.					
to satisfy the requirement of sufficient										
clarity										
Surveillance operation room(s) – the		te room means a secure	Surveillance operation room(s). The secured		Surveillance operation room(s). The					
secured area(s) where surveillance takes		na gaming operation used	area(s) where surveillance takes place and/or		secured area(s) where surveillance					
place and/or where active surveillance	primarily for	r casino surveillance.	where active surveillance equipment is located.		takes place and/or where active					
equipment is located.					surveillance equipment is located.					
Surveillance system – a system of video	Sunsillana	e sustam magns a system of	Surveillance system. A system of video cameras,		Surveillance system. A system of					_
cameras, monitors, recorders, video printers,		resease recorders, video	monitors, recorders, video printers, switches,		video cameras, monitors, recorders,					
switches, selectors, and other equipment		itches, selectors, and other	selectors, and other equipment used for		video printers, switches, selectors, and					
used for surveillance.		uipment used for casino	surveillance.		other equipment used for surveillance.					
used for surveillance.	supreillance	ulpinent used for casino	surveinance.		other equipment used for surveillance.					
Table games – games that are banked by	Table aame	es means games that are	Table games. Games that are banked by the				19. "Nonhouse-banked card games" means any card game,			Table games – games that are non-house banke
the house or a pool whereby the house or		the house or a pool whereby the					including games played in tournament formats and games in			house or a pool games, including games played i
the pool pays all winning bets and collects		e pool pays all winning bets and					which the tribe collects a fee from the player for participating			tournament format, whereby all bets are placed in
from all losing bets.		n all losing bets.	bets				and all bets are placed in a common pool or pot from which			common player's pool, from which all player winn
		3					all player winnings, prizes and direct costs are paid. As			prizes and direct costs are paid; the house or the
							provided herein, adminstrative fees may be charged by the			pays all winning bets and collects from all losing I
							tribe against any common pool in an amount equal to any			
							fee paid to the state; provided that the tribe may seed the			
							pool as it determines necessary from time to time;			
T-11-1			Table Secretary W. C. C. C.				•			
Table inventory –the total coins, chips, and		ntory means the total coins,	Table inventory. The total coins, chips, and							
markers at a table.  Table inventory form – the form used by		narkers at a table.	markers at a table.							
gaming operation supervisory personnel to		ntory form means the form	Table inventory form. The form used by gaming operation supervisory personnel to document							
document the inventory of chips, coins, and		ning operation supervisory o document the inventory of	the inventory of chips, coins, and tokens on a							
tokens on a table at the beginning and	II c									
ending of a shift		, and tokens on a table at the and ending of a shift	table at the beginning and ending of a shift.							
Table tray – the container located on			Table tray. The container located on gaming							
gaming tables where chips, coins, or cash			e tables where chips, coins, or cash are stored that							
are stored that are used in the game.		are used in the game.	are used in the game.							
game.	Stored that t									
		s the same as earned and	Take. The same as earned and unearned take.							Take – the same as earned and unearned take.
Take – the same as earned and unearned	unearned ta									
Take – the same as earned and unearned take.										
Take – the same as earned and unearned take.										
Take – the same as earned and unearned take.	Į.									
Take – the same as earned and unearned take.			i l							
Take – the same as earned and unearned take.							T. C.			i i
Take – the same as earned and unearned take.										
Take – the same as earned and unearned take.										
Take – the same as earned and unearned take.										
take.										
take.  Theoretical hold – the intended hold			d Theoretical hold. The intended hold percentage							
Theoretical hold – the intended hold percentage or win of an individual gaming	percentage	or win of an individual gaming	or win of an individual gaming machine as							
Theoretical hold – the intended hold percentage or win of an individual gaming machine as computed by reference to its	percentage machine as	or win of an individual gaming computed by reference to its	or win of an individual gaming machine as computed by reference to its payout schedule							
Theoretical hold – the intended hold percentage or win of an individual gaming	percentage machine as	or win of an individual gaming	or win of an individual gaming machine as							

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Section 1 - Definitions	542.1	542.2	BULLETIN 2018-3	543.1	543.2	543.3	Part 3. Definitions			
Theoretical hold worksheet – a worksheet		Theoretical hold worksheet means a	Theoretical hold worksheet. A worksheet	- 10.2	2.5.2	J-10.0				
provided by the manufacturer for all gaming		worksheet provided by the manufacturer for								
machines that indicate the theoretical			machines that indicate the theoretical							
		all gaming machines that indicate the								
percentages that the gaming machine		theoretical percentages that the gaming	percentages that the gaming machine should							
should hold based on adequate levels of		machine should hold based on adequate	hold based on adequate levels of coin-in. The							
coin-in. The worksheet also indicates the		levels of coin-in. The worksheet also indicate	worksheet also indicates the reel strip settings,							
reel strip settings, number of credits that		the reel strip settings, number of credits that	number of credits that may be played, the							
may be played, the payout schedule, the		may be played, the payout schedule, the	payout schedule, the number of reels and other							
number of reels and other information		number of reels and other information	information descriptive of the particular type of							
descriptive of the particular type of gaming		descriptive of the particular type of gaming								
machine.		machine.	garring macrine.							
TICS (Tribal Internal Control Standards) –			TICS. Tribal Internal Control Standards		TICS. Tribal Internal Control Standards		Part 5. (A) requires the tribe to promulgate regulations that			TICS (Tribal Internal Control Standards) – st
standards established by the CNGC that			established by the TGRA that are at least as		established by the TGRA that are at		expressly include or incorporate by reference the Compact			established by the CNGC that meet the internal
meet the standards set forth in 25 CFR Parts			stringent as the standards set forth in this part.		least as stringent as the standards set		provisions; (B) including the internal control provisions			standards set forth in 25 CFR Parts 542 and 54
542 and 543.					forth in this part.		included in Part C and D.			Tribal State Compacts to which the Nation is a
542 and 543.					iorariii alis parc		included in Fart C and B.			Those State Compacts to which the Nation's a
Tier A -Gaming operations with annual		Tier A means gaming operations with	Tier A. Gaming operations with annual gross		Tier A. Gaming operations with					Tier A - Gaming operations with annual gross
gross gaming revenues of more than \$3 1		annual gross gaming revenues of more than	gaming revenues of more than \$3 million but		annual gross gaming revenues of					revenues of more than \$3 1 million but not mo
million but not more than \$8 million.		\$1 million but not more than \$5 million.	not more than \$8 million.		more than \$3 million but not more					5 million.
					than \$8 million.					
Tier B - Gaming operations with annual		Tier B means gaming operations with	Tier B. Gaming operations with annual gross		Tier B. Gaming operations with					Tier B - Gaming operations with annual gross
gross gaming revenues of more than \$8		annual gross gaming revenues of more than			annual gross gaming revenues of					revenues of more than \$8 5 million but not mo
million but not more than \$15 million.		\$5 million but not more than \$15 million.	not more than \$15 million.		more than \$8 million but not more					\$15 million.
		45ION DUCTION MOTE WAIT \$15 MINION.	not more than \$15 million.		than \$15 million.					\$15 minon.
Tier C - Gaming operations with annual		Tier C means gaming operations with	Tier C. Gaming operations with annual gross		Tier C. Gaming operations with				+	
gross gaming revenues of more than \$15		annual gross gaming revenues of more than	garming revenues or more than \$15 million.		annual gross gaming revenues of					
million.		\$15 million.			more than \$15 million.				+	
Tokens – a coin-like cash substitute, in			Tokens. A coin-like cash substitute, in various							
various denominations, used for gambling		various denominations, used for gambling	denominations, used for gambling transactions.							
transactions.		transactions.								
Vault – means a secure area within the		Vault means a secure area within the	Vault. A secure area where cash and cash		Vault. A secure area where cash and					
gaming operation where (tokens, checks)		gaming operation where tokens, checks,	equivalents are stored.		cash equivalents are stored.					Vault – means a secure area within the gamin
cash equivalents, cash, coins, and chips are		cash, coins, and chips are stored.								where (tokens, checks) cash equivalents, cash,
stored		cash, coms, and emps are stored.								chips are stored.
Voucher -A financial instrument of fixed			Voucher, A financial instrument of fixed		Voucher. A financial instrument of					Voucher A financial instrument of fixed wage
wagering value, usually paper, that can be			wagering value, usually paper, that can be used		fixed wagering value, usually paper,					usually paper, that can be used only to acquire
used only to acquire an equivalent value of			only to acquire an equivalent value of cashable		that can be used only to acquire an					
					, ,					equivalent value of cashable credits or cash the
cashable credits or cash through interaction			credits or cash through interaction with a		equivalent value of cashable credits or					interaction with a voucher system.
with a voucher system.			voucher system.		cash through interaction with a					
Voucher system - A system that securely			Voucher system. A system that securely		Voucher system. A system that					Voucher system - A system that securely main
maintains records of vouchers and coupons;			maintains records of vouchers and coupons;		securely maintains records of vouchers					records of vouchers and coupons; validates pa
validates payment of vouchers; records			validates payment of vouchers; records		and coupons; validates payment of					vouchers; records successful or failed payment
successful or failed payments of vouchers			successful or failed payments of vouchers and		vouchers; records successful or failed					vouchers and coupons; and controls the purgi
and coupons; and controls the purging of			coupons; and controls the purging of expired		payments of vouchers and coupons;					expired vouchers and coupons.
										expired voderiers and coapons.
expired vouchers and coupons.			vouchers and coupons.		and controls the purging of expired					
					vouchers and coupons.					
Weigh / Count – the value of coins and		Weigh/Count means the value of coins and	d							Weigh / Count – the value of coins and toker
tokens counted by a weigh machine.		tokens counted by a weigh machine.								by a weigh machine.
Wide area progressive gaming machine –		Wide area progressive gaming machine	Wide area progressive gaming machine. A							
a progressive gaming machine that is linked			is progressive gaming machine that is linked to							
to machines in other operations and play on			machines in other operations and play on the							
the machines affect the progressive amount.		play on the machines affect the progressive								
As wagers are placed, the progressive		amount. As wagers are placed, the	wagers are placed, the progressive meters on all							
meters on all of the linked machines		progressive meters on all of the linked	of the linked machines increase.							
increases.		machines increase.								
Win – the net win resulting from all gaming		Win means the net win resulting from all	Win. The win from gaming activities, which is the							
activities. Net win results from deducting all		gaming activities. Net win results from	difference between gaming wins and losses							
gaming losses from all wins prior to		deducting all gaming losses from all wins								
			before deducting costs and expenses (see Gross							
considering associated operating expenses.		prior to considering associated operating	Gaming Revenue).							
Win to write held nercentant win		Win to write held re	Win to write held percentage. The use divided						+	
Win-to-write hold percentage – win			Win-to-write hold percentage. The win divided							
divided by write to determine hold		divided by write to determine hold	by write to determine hold percentage.							
percentage.		percentage.								
		Wrap means the method of storing coins	Wrap. The method of storing coins after the							
		after the count process has been completed,	, count process has been completed, including,							
		including, but not limited to, wrapping,	but not limited to, wrapping, racking, or bagging.							
		racking, or bagging. May also refer to the	May also refer to the total amount or value of							
		total amount or value of the counted and	the counted and stored coins.							
Write – the total amount wagered in keno,		Write means the total amount wagered in	Write. The total amount wagered in keno, bingo,						1	Write – the total amount wagered in keno, b
bingo, pull tabs, and pari-mutuel operations.		keno, bingo, pull tabs, and pari-mutuel	pull tabs, and pari-mutuel operations.							tabs, and pari-mutuel operations.
		operations.							+	
Writer - Writer means an employee who		Writer means Writer means an employee	Writer. An employee who writes keno, bingo,							Writer – Writer means an employee agent v
Writer means an employee who		had been sufficient to some the former and the first conservation	pull tabs, or pari-mutuel tickets. A keno writer		1		i l			keno, bingo, pull tabs, or pari-mutuel tickets.
		who writes keno, bingo, pull tabs, or pari-	pull tabs, of pari-filutuel tickets. A kello writer				l l			
Writer – Writer means an employee who writes keno, bingo, pull tabs, or pari-mutuel tickets. A keno writer usually also makes		mutuel tickets. A keno writer usually also	usually also makes payouts.							writer usually also makes payouts.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
2.1	Section 2 - Compliance	E42.2 How do I comply with this part?	542.3 How do tribal governments comply with this	Part 5. RULES AND REGULATIONS; MINIMUM		2.1 General
2.1		542.3 How do I comply with this part?	part?	REQUIREMENTS FOR OPERATIONS		
A	The Cherokee Nation Gaming Commission (CNGC) is required to establish and implement internal control standards pursuant to 25 CFR part 542 and 543 to ensure that gaming operations comply with the National Indian Gaming Commission's Minimum Internal Control Standards (MICS) and the Tribal Gaming Compact(s) between the Cherokee Nation and the State of Oklahoma, in particular, Part 5, regarding the minimum requirements for operations, and the procedural aspects of Part 6.	542.3(g)(1) Enforcement of Commission Minimum Internal Control Standards. Each Tribal gaming regulatory authority is required to establish and implement internal control standards pursuant to paragraph (c) of this section. Each gaming operation is then required, pursuant to paragraph (d) of this section, to develop and implement an internal control system that complies with the Tribal internal control standards. Failure to do so may subject the Tribal operator of the gaming operation, and/or the management contractor, to penalties under 25 U.S. C. 2713.	543.3(b) <i>TICS</i> . TGRAs must ensure that TICS are established and implemented that provide a level of control that equals or exceeds the applicable standards set forth in this part.  543.3(h)(1) Each TGRA is required to establish and implement TICS pursuant to paragraph (b) of this section. Each gaming operation is then required, pursuant to paragraph (c) of this section, to develop a SICS that implements the TICS. Failure to comply with this subsection may subject the tribal operator of the gaming operation, or the management contractor, to penalties under 25 U.S.C. 2713.	5(A) Regulations. At all times during the Term of this Compact, the tribe shall be responsible for all duties which are assigned to it, the enterprise, the facility, and the TCA under this Compact. The tribe shall promulgate any rules and regulations necessary to implmement this Compact, which at a minimum shall expressly include or incorporate by reference all provisions of Part 5 and the procedural requirements of Part 6 of this Compact	-	The Cherokee Nation Gaming Commission (CNGC) is required to establish, and implement, and revise internal control standards pursuant to 25 CFR part 542 and 543 to ensure that gaming operations comply with the National Indian Gaming Commission's Minimum Internal Control Standards (MICS) and the internal control standards or standards of operation required under any Tribal-State Gaming Compact(s) between the Cherokee Nation and the State of Oklahoma, in particular, Part 5, regarding the minimum requirements for operations, and the procedural aspects of Part 6.
В	The MICS are minimum standards and the CNGC shall establish controls as defined within these Tribal Internal Control Standards (TICS) that do not conflict with the MICS or the Compact.		543.3 (a) Minimum standards. These are minimum standards and a TGRA may establish and implement additional controls that do not conflict with those set out in this part.	5(B) Compliance; Internal Control Standards. All enterprises and facilities shall comply with, and all covered games approved under the procedures set forth in this Compact shall be operated in accordance with the requirements set forth in this Compact, including, but not limited to, those set forth in subsections C and D of this Part. In addition, all enterprises and facilities shall comply with the 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 MICS are minimum standards and the CNGC shall establish controls as defined within these Tribal Internal Control Standards (TICS) that do not conflict are: (1) scrupulously consistent with those in the MICS; and (2) not impose additional standards not otherwise required under the Gaming Code, any Tribal-State Gaming Compact, MICS, NIGC regulations, or other applicable federal laws or regulations. with the MICS or the Compact.
		542.4(a) If there is a direct conflict between an internal control standard established in a Tribal-State compact and a standard or requirement set forth in this part, then the internal control standard established in a Tribal-State compact shall prevail.  542.4(b) If an internal control standard in a Tribal-State compact provides a level of control that equals or exceeds the level of control under an internal control standard or requirement set forth in this part then the Tribal-State compact standard shall prevail.  542.4(c) If an internal control standard or requirement set forth in this part provides a level of control that exceeds the level of control under an internal control standard established in a Tribal-State compact, then the internal control standard or requirement set forth in this part shall prevail.				For any overlapping areas within the internal control standards covered in 25 CFR 542 and/or related guidance for Class III, 25 CFR 543 for Class II, any additional internal controls required within any Tribal-State Gaming Compact(s), or other applicable standard, the more stringent requirement or most comprehensive standard shall prevail.
С	Each gaming operation is then required to develop a System of Internal Control Standards (SICS), as approved by the CNGC, that implements the standards reflected in this document.	542.3(d) <i>Gaming operations</i> . Each gaming operation shall develop and implement an internal control system that, at a minimum, complies with the tribal internal control standards.  542.3(g)(1) Each gaming operation is then required, pursuant to paragraph (d) of this section, to develop and implement an internal control system that complies with the Tribal internal control standards	SICS, as approved by the TGRA, to implement the TICS.  543.3(h)(1) Each TGRA is required to establish and implement TICS pursuant to paragraph (b) of this section. Each gaming operation is then required,	Part 5(A) Regulations. At all times during the Term of this Compact, the tribe shall be responsible for all duties which are assigned to it, the enterprise, the facility, and the TCA under this Compact. The tribe shall promulgate any rules and regulations necessary to implmement this Compact, which at a minimum shall expressly include or incorporate by reference all provisions of Part 5 and the procedural requirements of Part 6 of this Compact		D

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
	Failure to do so may subject the tribal operator of the operation and/or the management contractor, to penalties under 25 USC 2713	542.3(g)(1) Failure to do so may subject the Tribal operator of the gaming operation, and/or the management contractor, to penalties under 25 U.S.C. 2713.	543.3(h)(1) Each TGRA is required to establish and implement TICS pursuant to paragraph (b) of this			
	or Cherokee Nation law or regulation.	operation, and/or the management contractor, to penalities under 25 0.5.c. 2725.	section. Each gaming operation is then required,			
D			pursuant to paragraph (c) of this section, to develop a			_
			SICS that implements the TICS. Failure to comply with this subsection may subject the tribal operator of the			
			gaming operation, or the management contractor,			
			to penalties under 25 U.S.C. 2713.			
	Enforcement action by the NIGC will not be initiated under this part	542.3(g)(2) Recognizing that Tribes are the primary regulator of their gaming	543.3(h)(2) Enforcement of Commission MICS.			Enforcement action by the NIGC will not be initiated under
	without first informing the Cherokee Nation and CNGC of deficiencies in the TICS or absence of SICS for its gaming operation(s) and	operation(s), enforcement action by the Commission will not be initiated under this part without first informing the Tribe and Tribal gaming regulatory authority	Enforcement action by the Commission will not be initiated under this part without first informing the tribe			this part without first informing the Cherokee Nation and CNGC of deficiencies in the TICS or absence of SICS for its
	allowing a reasonable period of time to address such deficiencies.	of deficiencies in the internal controls of its gaming operation and allowing a	and TGRA of deficiencies in the TICS or absence of SICS			gaming operation(s) and allowing a reasonable period of
Е	Such prior notice and opportunity for corrective action are not	reasonable period of time to address such deficiencies. Such prior notice and	for its gaming operation and allowing a reasonable			F time to address such deficiencies. Such prior notice and
	required where the threat to the integrity of the operation is immediate and severe.	opportunity for corrective action is not required where the threat to the integrity of the gaming operation is immediate and severe.	period of time to address such deficiencies. Such prior notice and opportunity for corrective action are not			opportunity for corrective action are not required where the threat to the integrity of the operation is immediate and
	ininediate and severe.	of the gaming operation is immediate and severe.	required where the threat to the integrity of the gaming			severe.
			operation is immediate and severe.			
F	Each gaming facility must comply with the standards applicable to their respective tiers.					G
	Nothing in these TICS shall be construed to grant to a state	542.5 Nothing in this part shall be construed to grant to a state jurisdiction in	n	4(A) nothing in this Compact shall limit the tribe's right to		
G	jurisdiction in Class II gaming or extend a state's jurisdiction in Class III gaming.	class II gaming or extend a state's jurisdiction in class III gaming.		operate any game that is Class II under IGRA		H
		542.3(a) Compliance based upon tier.				
2.2	Determination of Tier	542.3(b) Determination of tier.	543.3(f) Determination of tier.			2.2 Determination of Tier Level.
		542.3(a)(1) Tier A gaming operations must comply with §§542.1 through 542.18,				Certain standards may be applicable in accordance with the
		and §§542.20 through 542.23.				gaming operation's tier level as established within Section 1
		542.3(a)(2) Tier B gaming operations must comply with §§542.1 through 542.18,				– Definitions for Tier A, Tier B, and Tier C.
		and §§542.30 through 542.33.				A
		542.3(a)(3) Tier C gaming operations must comply with §§542.1 through 542.18,				
		and §§542.40 through 542.43.				
	Determination of tier level will be made based upon the annual gross	542.3(b)(1) The determination of tier level shall be made based upon the	543.3(f)(1) The determination of tier level will be made			
	gaming revenues indicated within the gaming operations' audited financial statements.	annual gross gaming revenues indicated within the gaming operation's audited financial statements. Gaming operations moving from one tier to	based upon the annual gross gaming revenues indicated within the gaming operation's audited financial			
A		another shall have nine (9) months from the date of the independent certified	statements.			В
		public accountant's audit report to achieve compliance with the requirements of				
	Gaming operations moving from one tier to another shall have nine	the new tier. 542.3(b)(1) Determination of tier. The determination of tier level shall be made	543.3(f)(2) Gaming operations moving from one tier			
	(9) months from the date of the independent certified public	based upon the annual gross gaming revenues indicated within the gaming	to another will have nine months from the date of			
	accountant's audit report to achieve compliance with the requirements of the new tier.	operation's audited financial statements. Gaming operations moving from one tier to another shall have nine (9) months from the date of the independent	the independent certified public accountant's audit report to achieve compliance with the requirements			
В	requirements of the new ten.	certified public accountant's audit report to achieve compliance with the	of the new tier. The TGRA may extend the deadline by			С
		requirements of the new tier.	an additional six months if written notice is provided to			
			the Commission no later than two weeks before the expiration of the nine month period.			
	The CNGC may extend the deadline by an additional six (6) months at	542.3(b)(2) The Tribal gaming regulatory authority may extend the deadline by an				
		additional six (6) months if written notice is provided to the Commission no later	another will have nine months from the date of the			
	two weeks before the expiration of the nine (9) month period.	than two weeks before the expiration of the nine (9) month period.	independent certified public accountant's audit report			
С			to achieve compliance with the requirements of the new tier. The TGRA may extend the deadline by an			D
			additional six months if written notice is provided to			
			the Commission no later than two weeks before the expiration of the nine month period.			
-		542.3(d)(2) New gaming operations. All gaming operations that commence				All gaming operations that commence operations after the
		operations after August 26, 2002, shall compy with this part before				established effective date of the TICS or the effective date
		commencement of operations.				E of any revisions thereafter, must comply with the TICS
						before the commencement of operations.
2.3	Tribal Internal Control Standards	542.3(c) Tribal internal control standards.	543.3(b) <i>TICS</i> .			2.3 Tribal Internal Control Standards.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs R	EF Recommended Revisions
	The CNGC must ensure that the Tribal Internal Control Standards	542.3(c) Within six (6) months of June 27, 2002, each Tribal gaming regulatory	543.3(b)(1) TICS . TGRAs must ensure that TICS are	5(A) Regulations. At all times during the Term of this Compact,		The CNGC must ensure that the Tribal Internal Control
	(TICS) provide a level of control that does not exceed or conflict with	authority shall, in accordance with the Tribal gaming ordinance, establish and	established and implemented that provide a level of	the tribe shall be responsible for all duties which are assigned to		Standards (TICS) provide a level of control that does not
	the applicable standards set forth in the MICS and the Compact. The	implement tribal internal control standards that shall:	control that equals or exceeds the applicable standards	it, the enterprise, the facility, and the TCA under this Compact.		exceed or conflict with the applicable standards set forth in
	CNGC shall, in accordance with the tribal gaming ordinance,		set forth in this part. (1) Evaluation of existing TICS. Each	The tribe shall promulgate any rules and regulations necessary		2.1(A-C) of this section. the MICS and the Compact. The
	determine whether and to what extent revisions are necessary to		TGRA must, in accordance with the tribal gaming	to implement this Compact, which at a minimum shall expressly		CNGC shall, in accordance with the tribal gaming ordinance,
	ensure compliance.		ordinance, determine whether and to what extent their	include or incorporate by reference all provisions of Part 5 and		determine whether and to what extent revisions are
			TICS require revision to ensure compliance with this	the procedural requirements of Part 6 of this Compact		necessary to ensure compliance.
			part.			,
				5(B) Compliance; Internal Control Standards. All enterprises		
				and facilities shall comply with, and all covered games approved		
Α				under the procedures set forth in this Compact shall be		
				operated in accordance with the requirements set forth in this		
				Compact, including, but not limited to, those set forth in		
				subsections C and D of this Part. In addition, all enterprises and		
				facilities shall comply with the 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).		
<u> </u>						
	The CNGC shall establish deadlines for compliance with these Tribal	542.3(c)(4) Establish a deadline, which shall not exceed nine (9) months from June	_ ·			The CNGC shall establish deadlines for compliance with
	Internal Control Standards (TICS) and shall ensure compliance with	27, 2002, by which a gaming operation must come into compliance with the tribal	1			these Tribal Internal Control Standards (TICS) and shall
	those deadlines as set forth by the National Indian Gaming	internal control standards. However, the Tribal gaming regulatory authority may	within twelve months of the effective date of this part			ensure compliance with those deadlines as set forth by the
	Commission (NIGC) and in accordance with the Cherokee Nation	extend the deadline by an additional six (6) months if written notice is provided to	and implemented at the commencement of the next			National Indian Gaming Commission (NIGC) and in
	gaming ordinance, Title 4 of Cherokee Nation Code Annotated and	the Commission no later than two weeks before the expiration of the nine (9)	fiscal year. At the discretion of the TGRA, gaming			accordance with the Cherokee Nation gaming ordinance,
	shall establish, implement, and revise the control standards within this	month period.	operations may have an additional six months to come			Title 4 of Cherokee Nation Code Annotated, and shall
	document as follows:		into compliance with the TICS.			establish, implement, and revise the control standards-
						within this document as follows . Tribal Internal Control
			543.3(c)(1) Existing gaming operations. All gaming			Standards shall:
В			operations that are operating on or before the effective			В
			date of this part, must comply with this part within the			
			time requirments established in paragraph (b) of this			
			section. In the interim, such operations must contine to			
			comply with existing TICS.			
			543.3(c)(2) New gaming operations. All gaming			
			operations that commence operations after the effective			
			date of this part must comply with this part before			
			commencement of operations.			
			·			
1	These Tribal Internal Control Standards shall provide a level of control	542.3(c)(1) Provide a level of control that equals or exceeds those set forth in this		Part 5(B) Compliance; Internal Control Standards. All		These Tribal Internal Control Standards shall p Provide a
	that does not exceed or conflict with those set forth in 25 CFR Part	part;		enterprises and facilities shall comply with, and all covered		level of control that does not exceed or conflict with those
	542 and 543;			games approved under the procedures set forth in this Compact		standards set forth in 25 CFR Part 542 and 543, the
				shall be operated in accordance with the requirements set forth		minimum standards, as provided for in 2.1(B) of this part;
				in this Compact, including, but not limited to, those set forth in		
1				subsections C and D of this Part. In addition, all enterprises and		1
_				facilities shall comply with the tribal internal control standards		1
				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).		
				ancernal Control Standards (25 C. A., Falt 542).		
	Contain standards for currency transaction reporting that comply with	542.3(c)(2) Contain standards for currency transaction reporting that comply with				Contain standards for currency transaction reporting that
2	31 CFR Chapter X;	31 CFR part 103;				comply with IRS regulations and 31 CFR Chapter X; and
2	Establish standards for games that are not addressed in this part; and,	542.3(c)(3) Establish standards for games that are not addressed in this part; and				Establish standards for games authorized that are not
J	Continuous for Fort services at 1911 1911	FAC 2/4) Consider a constitute Foot possition				currently addressed. in this part; and,
	Gaming operations. Each gaming operation shall develop and	542.3(d) Gaming operations. Each gaming operation shall develop and implement				Gaming operations. Each gaming operation shall develop
4	implement an internal control system that, at a minimum, complies	an internal control system that, at a minimum, complies with the tribal internal				4 and implement an internal control system that, at a
	with the tribal internal control standards and is approved by CNGC.	control standards.				minimum, complies with the tribal internal control
		1				standards and is approved by CNGC.

REF CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
			5(A) Regulations. At all times during the Term of this Compact,		Any additional controls proposed by the SCA related to the
			the tribe shall be responsible for all duties which are assigned to		implementation of any Tribal-State Gaming Compact(s) w
			it, the enterprise, the facility, and the TCA under this Compact.		be given good faith consideration. The CNGC shall notify
			The tribe shall promulgate any rules and regulations necessary		the SCA of its response or action with respect to such
			to implement this Compact, which at a minimum shall expressly		proposals.
			include or incorporate by reference all provisions of Part 5 and		
			the procedural requirements of Part 6 of this Compact. Nothing		
			in this Compact shall be construed to affect the tribe's right to		
			amend its rules and regulations, provided that any such		С
			amendment shall be in conformity with this Compact. <b>The SCA</b>		
			may propose additional rules and regulations related to		
			implementation of this Compact to the TCA at any time, and		
			the TCA shall give good faith consideration to such		
			suggestions and shall notify the SCA of its response or		
			action with respect thereto.		
The CNGC will provide for a comment period for any proposed					
additions/revisions of the CNGC TICS prior to their implementation in					D
decordance with the energice nation national active recedure net					D
Legislative Act 13-07 as amended.					
2.4 Extension Process for Gaming Operations					2.4 Extension Process for Gaming Operations
	542.3(d)(1) Existing gaming operations. All gaming operations that are operating	543.3(c)(1) Existing gaming operations. All gaming			Jerus Samuel
	on or before June 27, 2002, shall comply with this part within the time	operations that are operating on or before the effective			
	requirements established in paragraph (c) of this section. In the interim, such	date of this part, must comply with this part within the			
	operations shall continue to comply with existing tribal internal control standards				
		section. In the interim, such operations must continue to			
		comply with existing TICS.			
		, , , , , , , , , , , , , , , , , , ,			
New gaming operations. All gaming operations that commence	542.3(d)(2) New gaming operations. All gaming operations that commence	543.3(b)(2) Compliance date. All changes necessary to			New gaming operations. All gaming operations that
operations after the effective date of this part must comply with this	operations after August 26, 2002, shall comply with this part before	ensure compliance with this part must be promulgated			commence operations after the effective date of this part-
part before commencement of operations.	commencement of operations.	within twelve months of the effective date of this part			must comply with this part before commencement of
		and implemented at the commencement of the next			operations.
		fiscal year. At the discretion of the TGRA, gaming			
		operations may have an additional six months to come			
A		into compliance with the TICS.			A
		543.3(c)(2) New gaming operations. All gaming			
		operations that commence operations after the effective			
		date of this part must comply with this part before			
		commencement of operations.			
		543.3(c)(2) New gaming operations. All gaming			
		operations that commence operations after the effective	,		
		date of this part must comply with this part before			
		commencement of operations.			
2.5 Variance Process for Gaming Operations	542.18(a) Tribal gaming regulatory authority approval. Revised May 4, 2005)	543.5(a) TGRA approval.			2.4 Variance Process for Gaming Operations
CNGC may approve a variance for a gaming operation if it has	542.18(a)(1) A Tribal gaming regulatory authority may approve a variance for a	543.5(a)(1) A TGRA may approve an alternate standard			CNGC may approve a variance from these standards for a
determined that the variance will achieve a level of control sufficient	gaming operation if it has determined that the variance will achieve a level of	from those required by this part if it has determined tha	,		gaming operation if it has determined that the variance (i.e.
to accomplish the purpose of the standard it is to replace.	control sufficient to accomplish the purpose of the standard it is to replace.	the alternate standard will achieve a level of security and			alternate standard) will achieve a level of control security
to accomplish the purpose of the standard it is to replace.	control sametene to accomplish the purpose of the standard it is to replace.	integrity sufficient to accomplish the purpose of the			and integrity sufficient to accomplish the purpose of the
		standard it is to replace. A gaming operation may			standard it is to replace. A gaming operation may
A					, ,
		implement an alternate standard upon TGRA approval			implement an alternate standard, in accordance with CNGC
		subject to the Chair's decision pursuant to paragraph (b)			approval. Class II MICS variances are subject to the NIGC
		of this section.			Chair's decision, pursuant to Section 2.5 of this part.
For each standard, for which the gaming operations seeks a variance,	[7/3/19/a)/2) For each appropriated standard formula in Till 1	543.5(a)(2) For each <b>enumerated</b> standard for which the			For each enumerated standard, for which the a licensed
it shall submit to the CNGC a written request by management and a	542.18(a)(2) For each enumerated standard for which the Tribal gaming regulator				gaming operations seeks a variance, it shall submit to the
B detailed report, which shall include the following:	authority approves a variance, it shall submit to the Chairman of the NIGC, within				B CNGC a written request by management and a detailed
	thirty (30) days, a detailed report, which shall include the following:	include the following:			report, which shall include the following:
1 A detailed description of the variance;	542.18(a)(2)(i) A detailed description of the variance;		†		A detailed description of the variance; and
An explanation of how the variance achieves a level of security,	542.18(a)(2)(ii) An explanation of how the variance achieves a level of control	543.5(a)(2)(i) An explanation of how the alternate			An explanation of how the variance achieves a level of
integrity, and controls sufficient to accomplish the purpose of the	sufficient to accomplish the purpose of the standard it is to replace; and	standard achieves a level of security and integrity			security, integrity, and controls sufficient to accomplish the
standard it is to replace; and,	1 1 2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	sufficient to accomplish the purpose of the standard it is	;		purpose of the standard it is to replace. and,
		to replace: and	<u> </u>		
The alternate standard as approved and the record on which it is		543.5(a)(2)(ii) The alternate standard as approved and			The alternate standard as approved and the record on
	•				2 I
3 based.		the record on which it is based.			<sup>3</sup> which it is based.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
C	For each standard for which the CNGC approves a variance that may not comply specifically to those standards promulgated by the NIGC, the CNGC shall submit to the NIGC or directly to the Chairman of the NIGC, within thirty (30) days, a report from the CNGC or its designee authorizing the variance and that documentation submitted to and used by the CNGC in its determination and authorization of the variance as prescribed.	542	543.5(a)(2) For each enumerated standard for which the TGRA approves an alternate standard, it must submit to the Chair within 30 days a detailed report, which must include the following:  543.5(a)(2)(i) An explanation of how the alternate standard achieves a level of security and integrity sufficient to accomplish the purpose of the standard it is to replace; and  543.5(a)(2)(ii) The alternate standard as approved and the record on which it is based.	Tribal - State Compact	Other Regs	REF Recommended Revisions  For each standard for which the CNGC approves a variance that may not comply specifically to those standards promulgated by the NIGC in 25 CFR 543, the CNGC shall submit to the NIGC or directly to the Chairman of the NIGC Chairperson, within thirty (30) days, a report from the CNGC or its designee authorizing the variance and that the documentation submitted to and used by the CNGC in its determination and authorization of the variance as prescribed.
		542.18(a)(2)(iii) Evidence that the Tribal gaming regulatory authority has approved the variance.  542.18(a)(3) <b>In the event</b> that the Tribal gaming regulatory authority or the Tribe chooses to submit a variance request directly to the Chairman, it may do so without the approval requirement set forth in paragraph (a)(2)(iii) of this section and such request shall be deemed as having been approved by the Tribal gaming regulatory authority.	543.5(a)(3) In the event that the TGRA or the tribal government chooses to submit an alternate standard request directly to the Chair for joint government to government review, the TGRA or tribal government may do so without the approval requirement set forth in paragraph (a)(1) of this section.			In the event that the CNGC or the Cherokee Nation government chooses to submit an alternate standard request directly to the NIGC Chair for joint government to government review, the CNGC or tribal government may do so without the approval requirement set forth in Section 2.6.
2.6	NIGC Concurrence Review by Chairman of the NIGC.	<b>542 Variance process is not applicable.</b> 542.18(b) Review by the Chairman. (Revised May 4, 2005)	543.5(b) Chair review.			2.5 NIGC Concurrence with a Class II MICS Variance Review by Chairman person of the NIGC.
1	Following receipt of the variance approval from the CNGC, the Chairman or his or her designee shall have sixty (60) days to concur with or object to the approval of the variance.	542.18(b)(1) Following receipt of the variance approval, the Chairman or his or her designee shall have sixty (60) days to concur with or object to the approval of the variance. 542.18(b)(1)	543.5(b)(1) The Chair may approve or object to an alternate standard approved by a TGRA.			Following receipt of the variance approval from the CNGC, the Chairman or his or her designee shall have sixty (60) days to concur with or object to the approval of the variance.  The Chairperson may approve or object to an alternate standard approved by the CNGC.
2	Any objection raised by the Chairman shall be in the form of a written explanation based on the fact that either there is no valid explanation of why the gaming operation should have received a variance approval from the CNGC or the approved variance does not provide a level of control or security sufficient to accomplish the purpose of the standard it is to replace.		543.5(b)(2) If the Chair approves the alternate standard, the Tribe may continue to use it as authorized by the TGRA.			Any objection raised by the Chairman shall be in the form- of a written explanation based on the fact that either there is no valid explanation of why the gaming operation should have received a variance approval from the CNGC or the- approved variance does not provide a level of control or- security sufficient to accomplish the purpose of the standard it is to replace.  If the Chairperson approves the alternate standard, the gaming operation may continue to use it as authorized by the CNGC.
3	If the Chairman fails to object in writing within sixty (60)days after the date of receipt of a complete submission, the variance shall be considered concurred with by the Chairman of the NIGC.	542.18(b)(3) If the Chairman fails to object in writing within sixty (60) days after the date of receipt of a complete submission, the variance shall be considered concurred with by the Chairman. 542.18(b)(3)	543.5(b)(3) If the Chair objects, the operation may no longer use the alternate standard and must follow the relevant MICS set forth in this part.			If the Chairman fails to object in writing within sixty- (60)days after the date of receipt of a complete submission, the variance shall be considered concurred with by the Chairman of the NIGC.  If the Chairperson objects, the operation may no longer use the alternate standard and must follow the relevant Class II MICS set forth in this part.
4		542.18(b)(4) The 60-day deadline may be extended, provided such extension is mutually agreed upon by the Tribal gaming regulatory authority and the Chairman. 542.18(b)(4)	543.5(b)(4) Any objection by the Chair must be in writing and provide reasons that the alternate standard, as approved by the TGRA, does not provide a level of security or integrity sufficient to accomplish the purpose of the standard it is to replace.			The sixty (60) day deadline may be extended, provided such extension is mutually agreed upon by the CNGC and the Chairman of the NIGC.  4 Any objection by the Chairperson must be in writing and provide reasons that the alternate standard, as approved by the CNGC, does not provide a level of security or integrity sufficient to accomplish the purpose of the standard it is to replace.
			543.5(b)(5) If the Chair fails to approve or object in writing within 60 days after the date of receipt of a complete submission, the alternate standard is considered approved by the Chair. The Chair may, upon notification to the TGRA, extend this deadline an additional 60 days.			If the Chairperson fails to approve or object in writing within 60 days after the date of receipt of a complete submission, the alternate standard is considered approved. The Chairperson may, upon notification to the CNGC, extend this deadline an additional 60 days.

REF	CN TICS	542	543 Tri	bal - State Compact Other Regs	REF Recommended Revisions
	Curing Chairman's Objections. Following an objection by the Chairman, to the issuance of a variance, the CNGC shall have an opportunity to cure any objections noted by the Chairman.	542.18(c)(1) Curing Chairmans objections. (Revised May 4, 2005) Following an objection by the Chairman to the issuance of a variance, the Tribal gaming regulatory authority shall have the opportunity to cure any objections noted by	543.5(c) Appeal of Chair decision. A TGRA may appeal the Chair's decision pursuant to 25 CFR chapter III, subchapter H.		Curing Chairman's Objections. Following an objection by- the Chairman, to the issuance of a variance, the CNGC shall- have an opportunity to cure any objections noted by the
В		the Chairman.			B Chairman.  Appeal of Chairperson decision. The CNGC may appeal the Chair's decision pursuant to 25 CFR chapter III, subchapter
		542.18(a)(2)(iii) Evidence that the Tribal gaming regulatory authority has approved the variance.	government chooses to submit an alternate standard request directly to the Chair for joint government to		The CNGC may choose to submit an alternate standard request directly to the Chair for joint government to government review.
		542.18(a)(3) In the event that the Tribal gaming regulatory authority or the Tribe chooses to submit a variance request directly to the Chairman, it may do so without the approval requirement set forth in paragraph (a)(2)(iii) of this section and such request shall be deemed as having been approved by the Tribal gaming regulatory authority.	government review, the TGRA or tribal government may do so without the approval requirement set forth in paragraph (a)(1) of this section.		The CNGC may choose to submit an alternate standard request directly to the Chairperson for joint government to government review. See Section 2.4 above.
1	Rescinding its initial approval of the variance; or,	542.18(c)(2)(i) Rescinding its initial approval of the variance; or			1 Rescinding its initial approval of the variance; or,
2	Rescinding its initial approval, having the gaming operation submit a revised variance request, approving it, and re- submitting it to the Chairman.	542.18(c)(2)(ii) Rescinding its initial approval, revising the variance, approving it, and re-submitting it to the Chairman.			Rescinding its initial approval, having the gaming operation—  submit a revised variance request, approving it, and re— submitting it to the Chairman.
С	Upon any re-submission of a variance approval, the Chairman shall have thirty (30) days to concur with or object to the re-submitted variance.	542.18(c)(3) Upon any re-submission of a variance approval, the Chairman shall have thirty (30) days to concur with or object to the re-submitted variance.			Upon any re-submission of a variance approval, the-  Chairman shall have thirty (30) days to concur with or object to the re-submitted variance.
D	If the Chairman fails to object in writing within thirty (30) days after the date of receipt of the re-submitted variance, the re-submitted variance shall be considered concurred with by the Chairman.	542.18(c)(4) If the Chairman fails to object in writing within thirty (30) days after the date of receipt of the re-submitted variance, the re-submitted variance shall be considered concurred with by the Chairman.			If the Chairman fails to object in writing within thirty (30)- days after the date of receipt of the re-submitted variance, the re-submitted variance shall be considered concurred- with by the Chairman.
E	The thirty (30) day deadline may be extended, provided such extension is mutually agreed upon by the CNGC and the NIGC Chairman.	542.18(c)(5) The thirty (30) day deadline may be extended, provided such extension is mutually agreed upon by the Tribal gaming regulatory authority and the Chairman.			The thirty (30) day deadline may be extended, provided such extension is mutually agreed upon by the CNGC and the NIGC Chairman.
F	Upon receipt of objections to a re-submission of a variance, the CNGC, as approved by the CNGC, shall be entitled to an appeal to the full National Indian Gaming Commission, in accordance with the following process:	542.18(d)(1) Appeals. (Revised May 4, 2005) Upon receipt of objections to a resubmission of a variance, the Tribal gaming regulatory authority shall be entitled to an appeal to the full Commission in accordance with the following process:			Upon receipt of objections to a re-submission of avariance, the CNGC, as approved by the CNGC, shall beentitled to an appeal to the full National Indian Gaming-Commission, in accordance with the following process:
1	Within thirty (30) days of receiving an objection to a re- submission, the CNGC shall file its notice of appeal. Failure to file an appeal within this time period shall result in a waiver of the opportunity for an appeal.	542.18(d)(1)(i) Within thirty (30) days of receiving an objection to a resubmission, the Tribal gaming regulatory authority shall file its notice of appeal.			Within thirty (30) days of receiving an objection to a resubmission, the CNGC shall file its notice of appeal. Failure to file an appeal within this time period shall result in awaiver of the opportunity for an appeal.
G	An appeal under this section shall specify the reasons why the gaming operation believes the Chairman's objections should be reviewed, and shall include supporting documentation, if any.				An appeal under this section shall specify the reasons why- the gaming operation believes the Chairman's objections- should be reviewed, and shall include supporting- documentation. If any.
		542.18(d)(1)(ii) Failure to file an appeal within the time provided by this section shall result in a waiver of the opportunity for an appeal.			
		542.18(d)(1)(iii) An appeal under this section shall specify the reasons why the Tribal gaming regulatory authority believes the Chairman's objections should be reviewed, and shall include supporting documentation, if any.			
Н	The gaming operation shall be provided with any comments offered by the Chairman of the NIGC to the CNGC on the substance of the appeal, and shall be offered the opportunity to respond to any such comments within their written documentation.	542.18(d)(1)(iv) The Tribal gaming regulatory authority shall be provided with any comments offered by the Chairman to the Commission on the substance of the appeal by the Tribal gaming regulatory authority and shall be offered the opportunity to respond to any such comments.			The gaming operation shall be provided with any- comments offered by the Chairman of the NIGC to the- H CNGC on the substance of the appeal, and shall be offered- the opportunity to respond to any such comments within- their written documentation.
I	Within thirty (30) days after receipt of the appeal, the NIGC shall render a decision based upon the criteria set forth in 25 CFR 542.18, paragraph (b)(2) unless the CNGC elects to wave the thirty (30) day requirement in writing and to provide the NIGC additional time, not to exceed an additional thirty (30) days, to render a decision, allowing the NIGC sixty (60) days for consideration.	542.18(d)(1)(v) Within thirty (30) days after receipt of the appeal, the Commission shall render a decision based upon the criteria contained within paragraph (b)(2) of this section unless the Tribal gaming regulatory authority elects to wave the thirty (30) day requirement and to provide the Commission additional time, not to exceed an additional thirty (30) days, to render a decision.			Within thirty (30) days after receipt of the appeal, the NIGC-shall render a decision based upon the criteria set forth in 25 CFR 542.18, paragraph (b)(2) unless the CNGC elects towave the thirty (30) day requirement in writing and to provide the NIGC additional time, not to exceed an additional thirty (30) days, to render a decision, allowing the NIGC sixty (60) days for consideration.
J	In the absence of a decision within the time provided, the re- submission through the appeal process shall be considered concurred with by the NIGC and become effective.	542.18(d)(1)(vi) In the absence of a decision within the time provided, the Tribal gaming regulatory authority's resubmission shall be considered concurred with by the Commission and become effective.			In the absence of a decision within the time provided, the resubmission through the appeal process shall be considered concurred with by the NIGC and become effective.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
	The gaming operation shall comply with standards that achieve a level	542.18(e) Effective date of variance. The gaming operation shall comply with		·		The gaming operation shall comply with standards that
	of control sufficient to accomplish the purpose of the standard it is to	standards that achieve a level of control sufficient to accomplish the purpose of				achieve a level of control sufficient to accomplish the
	replace until such time as the Commission objects to the Tribal	the standard it is to replace until such time as the Commission objects to the				purpose of the standard it is to replace until such time as-
		Tribal gaming regulatory authority's approval of a variance as provided in				the Commission objects to the Tribal gaming regulatory
	paragraph 2.6 (A) of this section. Concurrence in a variance by the	paragraph (b) of this section. Concurrence in a variance by the Chairman or				authority's approval of a variance as provided in paragraph
	Chairman or Commission is discretionary and variances will not be	Commission is discretionary and variances will not be granted routinely. The				2.6 (A) of this section. Concurrence in a variance by the
K		gaming operation shall comply with standards at least as stringent as those set forth in this part until such time as the Chairman or Commission concurs with the				Chairman or Commission is discretionary and variances will not be granted routinely. The gaming operation shall
	the Chairman or Commission concurs with the Tribal gaming	Tribal gaming regulatory authority's approval of a variance. (Revised May 4, 2005)				comply with standards at least as stringent as those set
	regulatory authority's approval of a variance.	Tribal gaining regulatory authority 3 approval of a variance. (Newsea May 4, 2005)				forth in this part until such time as the Chairman or-
	regulatory dutilishing supprioral of a variance.					Commission concurs with the Tribal gaming regulatory
						authority's approval of a variance.
	CPA Testing and Guidelines	542.3(f) <i>CPA testing.</i> (Revised August 12, 2005)	543(d) Annual requirements.			2.76 CPA Testing and Guidelines-External Audit Standards.
2.7			,			
	Consistent with 25 CFR 571.12, Audit Standards, an annual			5(F) Audits. Consistent with 25 C.F.R., Section 571.12. Audit		Consistent with 25 CFR 571.12 and current Tribal-State
	independent financial statement audit of the Tribe's gaming			Standards, the TCA shall ensure that an annual independent		Gaming Compact(s), External Audit Standards, an annual
	operations shall be conducted as prescribed by the CNGC, provided			financial audit of the enterprise's conduct of covered games		independent financial statement audit of the Tribe's CNGC
	that the auditor selected by the CNGC shall be a firm of known and			subject to this Compact is secured. The audit shall, at a		licensed gaming operations shall be conducted as prescribed by the CNGC, in accordance with CNGC Rules
	demonstrable experience, expertise, and stature in conducting audits of this kind and scope. The audit shall examine revenues and expenses			minimum, examine revenues and expenses in connection with the conduct of covered games in accordance with generally		and Regulations, Chapter IV, Section H. provided that the
	incurred in connection with the conduct of all gaming activities in			accepted auditing standards and shall include, but not be		auditor selected by the CNGC shall be a firm of known and
	accordance with generally accepted auditing standards and shall			limited to, those matters necessary to verify the determination		demonstrable experience, expertise, and stature in-
	include, but not be limited to, those matters necessary to verify the			of adjusted gross revenues and the basis of the payments made		conducting audits of this kind and scope. The audit shall-
	determination of adjusted gross revenues and the basis of the			to the state pursuant to Part 11 of this Compact.		examine revenues and expenses incurred in connection with
	payments made to the NIGC and to the State pursuant to the			·		the conduct of all gaming activities in accordance with
Α	requirements set forth in the Tribal- State Compact. The audit shall be			5(F)(3) The audit shall be conducted within five (5) months		A generally accepted auditing standards and shall include, but
	concluded within five (5) months following the close of each calendar			following the close of each calendar year, provided that		not be limited to, those matters necessary to verify the
	year, provided that extensions may be requested by the CNGC. The			extensions may be requested by the tribe and shall not be		determination of adjusted gross revenues and the basis of
	audit report for the conduct of covered games shall be submitted to			refused by the state where the circumstances justifying the		the payments made to the NIGC and to the State pursuant
	the SCA within thirty (30) days of completion. The auditors work			extension request are beyond the tribe's control.		to the requirements set forth in the Tribal-State Compact.
	papers concerning covered games shall be made available to the SCA					The audit shall be concluded within five (5) months
	upon request.					following the close of each calendar year, provided that extensions may be requested by the CNGC. The audit
						report for the conduct of covered games shall be submitted
						to the SCA within thirty (30) days of completion. The-
						auditors work papers concerning covered games shall be
						made available to the SCA upon request.
	The Tribel Operator of the naming approximations and/or management					The Tribel Operator of the naming encustions and for
	The Tribal Operator of the gaming operations and/or management contractor may include their respective corporate audit in conjunction					The Tribal Operator of the gaming operations and/or-
	with the audits required by the CNGC. For reporting purposes, the					management contractor may include their respective- corporate audit in conjunction with the audits required by-
	audit of the conduct of covered games, as specified by the Tribal-					the CNGC. For reporting purposes, the audit of the conduct
	State Compact, shall be separately stated. Further, as part of the audit					of covered games, as specified by the Tribal-State Compact,
	report, the independent CPA shall certify to the CNGC that, in the					shall be separately stated. Further, as part of the audit
В	course of the audit, the auditor discovered no matters within the					Preport, the independent CPA shall certify to the CNGC that,
	scope of the audit which were determined or believed to be in					in the course of the audit, the auditor discovered no-
	violation of any provision stated within the Tribal-State Compact.					matters within the scope of the audit which were-
						determined or believed to be in violation of any
						provision stated within the Tribal-State Compact.
_	All gaming related contracts that result in purchases of supplies,					All gaming related contracts that result in purchases of
_	services, or concessions for more than \$25,000 in any year (except for					supplies, services, or concessions for more than \$25,000 in-
С	contracts for professional legal or accounting services) shall be					any year (except for contracts for professional legal or
	specifically included within the scope of the audit.					accounting services) shall be specifically included within the
	Copies of the annual independent financial audit of the Tribe's gaming					Scope of the audit.  Copies of the annual independent financial audit of the
	operations shall be submitted directly to the CNGC for distribution to					Tribe's gaming operations shall be submitted directly to the
	the National Indian Gaming Commission and to the State Compliance					CNGC for distribution to the National Indian Gaming
D	Agency, in accordance to the Tribal-State Compact, within 120 days of					Commission and to the State Compliance Agency, in-
	the gaming operations fiscal year end.					accordance to the Tribal-State Compact, within 120 days of
						the gaming operations fiscal year end.
	In addition to the annual independent financial statement audit, the					In addition to the annual independent financial statement-
	independent certified public accountant (CPA) shall perform an					audit, the independent certified public accountant (CPA)
E	assessment to verify that the gaming operation is in compliance with					shall perform an assessment to verify that the gaming
-	the MICS, and / or the Tribal Internal Control Standards (TICS) or					operation is in compliance with the MICS, and / or the
	SICS.			· ·		Tribal Internal Control Standards (TICS) or SICS.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
	An Independent CPA shall be engaged on an annual basis to perform	542.3(f)(1) An independent certified public accountant (CPA) shall be	543.23(d)(1) Agreed upon procedures. A CPA must be			An Independent CPA shall be engaged on an annual basis
	"Agreed-Upon Procedures" to verify that the gaming operation is in	engaged to perform "Agreed-Upon Procedures" to verify that the gaming	engaged to perform an an assessment to verify whether			to perform "Agreed-Upon Procedures" to verify that the
		operation is in compliance with the minimum internal control standards (MICS)	the gaming operation is in compliance with these MICS,			gaming operation is in compliance with the Tribal Internal
	in this document or a tribally approved variance thereto that has	set forth in this part or a Tribally approved variance thereto that has received	and/or the TICS or SICS if they provide at least the same			Controls Standards (TICS) set forth in this document or a
	received NIGC concurrence (where applicable), the NIGC MICS, and	Commission concurrence. The CPA shall report each event and procedure	level of controls as the MICS. The assessment must be			tribally approved variance thereto that has received NIGC
	the SICS where they provide the level of control required. The CPA	discovered by or brought to the CPA's attention that the CPA believes does not	performed in accordance with agreed upon procedures			concurrence (where applicable), the NIGC MICS, and the
	shall report each event and procedure discovered by or brought to	satisfy the minimum standards or Tribally approved variance that has received	and the most recent versions of the Statements on			SICS where they provide the level of control required. The
	the CPAs attention that the CPA believes does not satisfy these	Commission concurrence. The "Agreed-Upon Procedures" may be performed in	Standards for Attestation Engagements and Agreed- Upon Procedures Engagements (collectively "SSAEs"),			CPA shall report each event and procedure discovered by
	standards or the Tribal approved variance that has received NIGC	conjunction with the annual audit. The CPA shall report its findings to the Tribe,				brought to the CPAs attention that the CPA believes does not satisfy these standards or the Tribal approved variance
	concurrence. The "Agreed-Upon Procedures" may be performed in conjunction with the annual audit. The CPA shall report its findings to	Tribal gaming regulatory authority, and management. The Tribe shall submit two copies of the report to the Commission within 120 days of the gaming operation.				that has received NIGC concurrence. The "Agreed-Upon-
	,	fiscal year end. This regulation is intended to communicate the Commission's	s Accountants.			Procedures" may be performed in conjunction with the
F	copies of the report to the NIGC within 120 days of the gaming	position on the minimum agreed-upon procedures to be performed by the CPA.	(2) The tribe must submit two copies of the agreed-			annual audit. The CPA shall report its findings to the CNGC
	operations fiscal year end. Throughout these regulations, the CPAs	Throughout these regulations, the CPA's engagement and reporting are based on				the Tribe, and to management. The CNGC shall submit two
		Statements on Standards for Attestation Engagements (SSAEs) in effect as of	days of the gaming operation's fiscal year end in			copies of the report to the NIGC within 120 days of the-
	Attestation Engagements (SSAEs). If future revisions are made to the	December 31, 2003, specifically SSAE 10 ("Revision and Recodification Agreed-	conjunction with the submission of the annual financial			gaming operations fiscal year end. Throughout these
	SSAEs or new SSAEs are adopted that are applicable to this type of	Upon Procedures Engagements."). If future revisions are made to the SSAEs or	audit report required pursuant to 25 CFR part 571.			regulations, the CPAs engagement and reporting are base
	engagement, the CPA is to comply with any new or revised	new SSAEs are adopted that are applicable to this type of engagement, the CPA is				on Statements on Standards for Attestation Engagements
	professional standards in conducting engagements pursuant to these	to comply with any new or revised professional standards in conducting				(SSAEs). If future revisions are made to the SSAEs or new-
	regulations and the issuance of the agreed-upon procedures report.	engagements pursuant to these regulations and the issuance of the agreed-upon				SSAEs are adopted that are applicable to this type of
	The CPA shall perform the "Agreed- Upon procedures" in accordance	procedures report. The CPA shall perform the "Agreed-Upon Procedures" in				engagement, the CPA is to comply with any new or revised
	with the following:	accordance with the following: (Revised August 12, 2005)				professional standards in conducting engagements
						pursuant to these regulations and the issuance of the
						agreed upon procedures report. The CPA shall perform th
	The CPA shall compare the Tribal Internal Control Standards (TICS) to	542.3(f)(2)(i) The CPA shall compare the Tribal internal control standards to the				The CPA shall compare the Tribal Internal Control Standard
1		MICS to ascertain whether the criteria set forth in the MICS or Commission				(TICS) to the NIGC MICS to ascertain whether the criteria s
	MICS or NIGC approved variances are adequately addressed.	approved variances are adequately addressed.				forth in the NIGC MICS or NIGC approved variances are
	The CPA may utilize CNGC personnel to cross-reference the TICS to	E42.2(f)/2)(ji) The CBA may utilize personnel of the Tribal gaming regulatory				adequately addressed.  The CPA may utilize CNGC personnel to cross-reference the
	the NIGC MICS, provided the CPA performs a review of the work	542.3(f)(2)(ii) The CPA may utilize personnel of the Tribal gaming regulatory authority to cross-reference the Tribal internal control standards to the MICS,				TICS to the NIGC MICS, provided the CPA performs a review
	performed by CNGC personnel and assumes complete responsibility	provided the CPA performs a review of the Tribal gaming regulatory authority				of the work performed by CNGC personnel and assumes-
2	for the proper completion of the work product.	personnel's work and assumes complete responsibility for the proper completion				complete responsibility for the proper completion of the
	los the proper completion of the work product.	of the work product.				work product.
		or the work product.				Work products
	The CPA shall report each procedure discovered by or brought to the	542.3(2)(iii) The CPA shall report each procedure discovered by or brought to the				The CPA shall report each procedure discovered by or-
3	CPA's attention that the CPA believes does not satisfy the NIGC MICS	CPA's attention that the CPA believes does not satisfy paragraph (f)(2)(i) of this				3 brought to the CPA's attention that the CPA believes does
	requirements in part 2.7 (F)(1) in this section.	section.				not satisfy the NIGC MICS requirements in part 2.7 (F)(1) in
						this section.
	As a prerequisite to the evaluation of the gaming operation's system	542.3(f)(1)(i) As a prerequisite to the evaluation of the gaming operation's				As a prerequisite to the evaluation of the gaming
	of internal control standards (SICS), it is recommended that the CPA	internal control systems, it is recommended that the CPA obtain and review an				operation's system of internal control standards (SICS), it is
	obtain and review an organization chart depicting segregation of	organization chart depicting segregation of functions and responsibilities, a				recommended that the CPA obtain and review an-
4	functions and responsibilities, a description of the duties and responsibilities of each position shown on the organization chart, and	description of the duties and responsibilities of each position shown on the organization chart, and an accurate, detailed narrative description of the gaming				organization chart depicting segregation of functions and responsibilities, a description of the duties and
	an accurate, detailed narrative description of the operation's	operation's procedures in effect that demonstrate compliance.				responsibilities of each position shown on the organization
	procedures in effect that demonstrate compliance.	Toperation's procedures in effect that demonstrate compliance.				chart, and an accurate, detailed narrative description of the
	procedures in effect that demonstrate compilance.					operation's procedures in effect that demonstrate
						compliance
	The CPA shall complete the CPA NIGC MICS Compliance checklists or	542.3(f)(1)(ii) Complete the CPA NIGC MICS Compliance checklists or other				The CPA shall complete the CPA NIGC MICS Compliance
		comparable testing procedures. The checklists should measure compliance on a				checklists or other comparable testing procedures. The
	compliance on a sampling basis by performing walk-throughs,	sampling basis by performing walkthroughs, observations and substantive testing	j.			checklists should measure compliance on a sampling basis
	observations and substantive testing. The CPA shall complete separate	The CPA shall complete separate checklists for each gaming revenue center, cage				by performing walk-throughs, observations and substantiv
	checklists for each gaming revenue center, cage and credit, internal	and credit, internal audit, surveillance, information technology and complimentary	·			testing. The CPA shall complete separate checklists for eac
	audit, surveillance, information technology and complimentary	services or items. All questions on each applicable checklist should be completed				gaming revenue center, cage and credit, internal audit,
		Work-paper references are suggested for all "no" responses for the results				surveillance, information technology and complimentary
	completed. Work-paper references are suggested for all "no"	obtained during testing (unless a note in the "W/P Ref" can explain the				services or items. All questions on each applicable checklis
_	responses for the results obtained during testing (unless a note in the	exception).				should be completed. Work-paper references are
5	"W/P Ref" can explain the exception). If the CPA determines that the	[7.2.2(0/2) Alternatively 24.4]				5 suggested for all "no" responses for the results obtained
	internal audit procedures performed during the fiscal year have been	542.3(f)(2) <b>Alternatively, at the discretion of the Tribe,</b> the Tribe may engage				during testing (unless a note in the "W/P Ref" can explain-
	properly completed, the CPA may rely on the work of the internal audit for the completion of the MICS checklists as they relate to the	an independent certified public accountant (CPA) to perform the testing,				the exception).
	standards covered by this part.	observations and procedures reflected in paragraphs (f)(1)(i), (ii), and (iii) of this				
	standards covered by this part.	section utilizing the Tribal internal control standards adopted by the Tribal gaming regulatory authority or Tribally approved variance that has received				
		Commission concurrence. Accordingly, the CPA will verify compliance by the				
		gaming operation with the Tribal internal control standards. Should the Tribe				
		elect this alternative, as a prerequisite, the CPA will perform the following:				
		elect and atternative, as a prerequisite, the CLA will perform the following.				
	The CPA shall perform, at a minimum, the following procedures in	542.3(f)(1)(iii) The CPA shall perform, at a minimum, the following procedures in				The CPA shall perform, at a minimum, the following
	Time of A shan perform, at a minimum, the following procedures in	Is in the control of				<del>тте стл этан реноти, аса пинитин, ите тономину</del>
6	conjunction with the completion of the checklists:	conjunction with the completion of the checklists:				6 procedures in conjunction with the completion of the

REF	CN TICS	542 543	Tribal - State Compact	Other Regs	REF Recommended Revisions
	At least one unannounced observation of each of the following:	542.3(f)(1)(iii)(A) At least one unannounced observation of each of the following:	·		At least one unannounced observation of each of the
	Gaming machine coin drop, gaming machine currency acceptor drop,	Gaming machine coin drop, gaming machine currency acceptor drop, table games			following: Gaming machine coin drop, gaming machine
	table games drop, gaming machine coin count, gaming machine	drop, gaming machine coin count, gaming machine currency acceptor count, and			currency acceptor drop, table games drop, gaming machin
	currency acceptor count, and table games count. The AICPA's "Audits	table games count. The AICPA's "Audits of Casinos" Audit and Accounting Guide			coin count, gaming machine currency acceptor count, and
	of Casinos" Audit and Accounting Guide states that "observations of	states that "observations of operations in the casino cage and count room should			table games count. The AICPA's "Audits of Casinos" Audit
	operations in the casino cage and count room should not be	not be announced in advance * * *" For purposes of these procedures,			and Accounting Guide states that "observations of
	announced in advance * * *" For purposes of these procedures,	"unannounced" means that no officers, directors, or employees are given advance			operations in the casino cage and count room should not
	"unannounced" means that no officers, directors, or employees are	information regarding the dates or times of such observations. The independent			be announced in advance * * *" For purposes of these-
а	given advance information regarding the dates or times of such	accountant should make arrangements with the gaming operation and Tribal			a procedures, "unannounced" means that no officers,
	observations. The independent accountant should make arrangements	gaming regulatory authority to ensure proper identification of the CPA's			directors, or employees are given advance information
	with the gaming operation and CNGC to ensure proper identification	personnel and to provide for their prompt access to the count rooms.			regarding the dates or times of such observations. The
	of the CPA's personnel and to provide for their prompt access to the				independent accountant should make arrangements with-
	count rooms.				the gaming operation and CNGC to ensure proper-
					identification of the CPA's personnel and to provide for-
					their prompt access to the count rooms.
	The gaming machine coin count observation would include a weigh	542.3(f)(1)(iii)(A)(1) The gaming machine coin count observation would include a			The gaming machine coin count observation would include
	scale test of all denominations using pre-counted coin. The count	weigh scale test of all denominations using pre-counted coin. The count would be			a weigh scale test of all denominations using pre-counted
	would be in process when these tests are performed, and would be	in process when these tests are performed, and would be conducted prior to the			coin. The count would be in process when these tests are
h	conducted prior to the commencement of any other walk-through	commencement of any other walk-through procedures. For computerized weigh			performed, and would be conducted prior to the
D	i i i i i i i i i i i i i i i i i i i	scales, the test can be conducted at the conclusion of the count, but before the			commencement of any other walk-through procedures. For
	at the conclusion of the count, but before the final totals are	final totals are generated.			computerized weigh scales, the test can be conducted at
	generated.				the conclusion of the count, but before the final totals are
					<del>generated.</del>
	The checklists should provide for drop/count observations, inclusive of	542.3(f)(1)(iii)(A)(2) The checklists should provide for drop/count observations,			The checklists should provide for drop/count observations,
1	hard drop/count, soft drop/count and currency acceptor drop/count.	inclusive of hard drop/count, soft drop/count and currency acceptor drop/count.			inclusive of hard drop/count, soft drop/count and currency
	The count room would not be entered until the count is in process	The count room would not be entered until the count is in process and the CPA			acceptor drop/count. The count room would not be entered
	and the CPA would not leave the room until the monies have been	would not leave the room until the monies have been counted and verified to the			until the count is in process and the CPA would not leave
	counted and verified to the count sheet by the CPA and accepted into	count sheet by the CPA and accepted into accountability. If the drop teams are			the room until the monies have been counted and verified-
		unaware of the drop observations and the count observations would be			to the count sheet by the CPA and accepted into-
	and the count observations would be unexpected, the hard count and				accountability. If the drop teams are unaware of the drop-
С	soft count rooms may be entered simultaneously. Additionally, if the	Additionally, if the gaming machine currency acceptor count begins immediately			€ observations and the count observations would be
	gaming machine currency acceptor count begins immediately after	after the table games count in the same location, by the same count team, and			unexpected, the hard count and soft count rooms may be
	the table games count in the same location, by the same count team,	using the same equipment, the currency acceptor count observation can be			entered simultaneously. Additionally, if the gaming machine
	and using the same equipment, the currency acceptor count	conducted on the same day as the table games count observation, provided the			currency acceptor count begins immediately after the table
	observation can be conducted on the same day as the table games	CPA remains until monies are transferred to the vault/ cashier.			games count in the same location, by the same count team,
	count observation, provided the CPA remains until monies are				and using the same equipment, the currency acceptor countries observation can be conducted on the same day as the table
	transferred to the vault/cashier.				games count observation, provided the CPA remains until
Ь	Observations of the gaming operation's employees as they perform	542.3(f)(1)(iii)(B) Observations of the gaming operation's employees as they			Observations of the gaming operation's employees as they
	their duties.	perform their duties.			perform their duties.
е	Interviews with the gaming operation's employees who perform the relevant procedures.	542.3(f)(1)(iii)(C) Interviews with the gaming operation's employees who perform the relevant procedures.			e e Interviews with the gaming operation's employees who perform the relevant procedures.
		542.3(f)(1)(iii)(D) Compliance testing of various documents relevant to the			Compliance testing of various documents relevant to the
f	The scope of such testing should be indicated on the checklist where	procedures. The scope of such testing should be indicated on the checklist where			f procedures. The scope of such testing should be indicated
1	applicable.	applicable.			on the checklist where applicable.
	For new gaming operations that have been in operation for three	542.3(f)(1)(iii)(E) For new gaming operations that have been in operation for three			For new gaming operations that have been in operation for
_	months or less at the end of their business year, performance of this	months or less at the end of their business year, performance of this regulation,			three months or less at the end of their business year,
y	regulation, is not required for the partial period.	section 542.3(f), is not required for the partial period.			performance of this regulation, is not required for the
-	Delicense on Internal Auditors The CDA	E42.2/0/2) Pulling and Extended Auditory. The CDA annual to the first and the control of the con			partial period.
	Reliance on Internal Auditors. The CPA may rely on the work of an	542.3(f)(3) <b>Reliance on Internal Auditors.</b> The CPA may rely on the work of an internal auditors to the every allowed by the professional standards for the auditors to the every allowed by the professional standards for the			Reliance on Internal Auditors. The CPA may rely on the work
1	internal auditor, to the extent allowed by the professional standards,	internal auditor, to the extent allowed by the professional standards, for the			of an internal auditor, to the extent allowed by the
	for the performance of the recommended procedures specified in	performance of the recommended procedures specified in paragraphs (f)(1)(iii)(B), been properly completed, the CPA may rely on the work			professional standards, for the performance of the
	parts 2.7 (F) (6) (d, e and f) of this section, and for the completion of	(C), and (D) of this section, and for the completion of the checklists as they relate of the internal audit for the completion of the MICS			recommended procedures specified in parts 2.7 (F) (6) (d, e and f) of this section, and for the completion of the
G	the checklists as they relate to the procedures covered therein, provided that the internal audit department can demonstrate to the	to the procedures covered therein provided that the internal audit department can demonstrate to the satisfaction of the CPA that the requirements contained part.			checklists as they relate to the procedures covered therein,
	satisfaction of the CPA that the requirements contained within Section				provided that the internal audit department can
	23 – Internal Audit, as applicable, have been satisfied.	542.3(f)(3)(i)			demonstrate to the satisfaction of the CPA that the
					requirements contained within Section 23 – Internal Audit
					as applicable, have been satisfied.
<b>H</b>	Agreed-Upon Procedures are to be performed by the CPA to	542.3(f)(3)(ii) Agreed-upon procedures are to be performed by the CPA to			Agreed-Upon Procedures are to be performed by the CPA-
		determine that the internal audit procedures performed for a past 12-month			to determine that the internal audit procedures performed
1	month period (includes two 6- month periods) encompassing a	period (includes two 6-month periods) encompassing a portion or all of the most			for a past 12-month period (includes two 6- month periods
1	portion or all of the most recent business year has been properly	recent business year has been properly completed. The CPA will apply the			1 encompassing a portion or all of the most recent business
1		following Agreed-Upon Procedures to the gaming operation's written assertion:			year has been properly completed. The CPA will apply the
1	the gaming operation's written assertion:				following Agreed-Up Procedures to the gaming operation's
					written assertion:
<u> </u>		<u> </u>			

		542.3(f)(3)(ii)(A) Obtain internal audit department work-papers completed for a 12-	543.23(d)(3)(i)(B) Ensuring that the internal auditor		Other Regs	
		5 12.5(1)(5)(1)(1) (1) Obtain internal dualit department from papers completed for d 22	343.23(d)(3)(i)(b) Elisuring that the internal additor	l l		Obtain the internal audit department work-papers
	month period (includes two 6-month periods) encompassing a	month period (includes two 6-month periods) encompassing a portion or all of	completed checklists for each gaming department of the			completed for a 12-month period (includes two 6-month-
		the most recent business year and determine whether the CPA NIGC MICS	operation;			periods) encompassing a portion or all of the most recent
	•	-	operation,			
	* *	Compliance Checklists or other comparable testing procedures were included in				business year and determine whether the proper the CPA
		the internal audit workpapers and all steps described in the checklists were				Trade trace compliance enecklists of other comparable
, ,	work papers and all steps described in the checklists were initialed or	initialed or signed by an internal audit representative.				testing procedures were included in the internal audit wor
, ,	signed by an internal audit representative.					papers and all steps described in the checklists were
, ,						initialed or signed by an internal audit representative.
	5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
	• •	542.3(f)(3)(ii)(B) For the internal audit work-papers obtained in paragraph	543.23(d)(3) Review of internal audit. (i) The CPA must			For the internal audit work- papers obtained in part 2.7
	•		determine compliance by the gaming operation with the			G)(1)(a) of this section, on a sample basis, re-perform the
, ,	CPA NIGC MICS Compliance Checklists or other comparable testing	CPA NIGC MICS Compliance Checklists or other comparable testing procedures	internal audit reuirements in this paragraph (d) by:			procedures included in the CPA NIGC MICS Compliance
, '	procedures prepared by the internal audit department and determine	prepared by internal audit and determine if all instances of noncompliance noted				Checklists or other comparable testing procedures
, ,	if all instances of noncompliance noted in the sample were	in the sample were documented as such by internal audit. The CPA NIGC MICS				prepared by the internal audit department and determine
	•	Compliance Checklists or other comparable testing procedures for the applicable				if all instances of noncompliance noted in the sample
	•	- · · · · · · · · · · · · · · · · · · ·				were documented as such by the internal auditor(s). The-
		Drop and Count procedures are not included in the sample reperformance of				-
		procedures because the CPA is required to perform the drop and count				CPA NIGC MICS Compliance Checklists or other comparable
, '	re-performance of procedures because the CPA is required to perform	observations as required under paragraph (f)(1)(iii)(A) of this section of the				testing procedures for the applicable Drop and Count
, ,	the Drop and Count observations under part 2.7 (F) (6) (a) of this	Agreed-Upon Procedures. The CPA's sample should comprise a minimum of 3				procedures are not included in the sample re-performance
		percent of the procedures required in each CPA NIGC MICS Compliance Checklist				of procedures because the CPA is required to perform the
	3 .	or other comparable testing procedures for the gaming machine and table game				b Drop and Count observations under part 2.7 (F) (6) (a) of
		. 3. 3 3				
		departments and 5 percent for the other departments completed by internal audit				this section of the Agreed-Upon Procedures. The CPAs
		in compliance with the internal audit MICS. The reperformance of procedures is				sample should comprise a minimum of 3 percent of the
i i	for the other departments completed by the internal audit	performed as follows:				procedures required in each CNGC Compliance Checklist or
1	department in compliance with the Section 23 - Internal Audit TICS.					other comparable testing procedures for the gaming-
	The re-performance of the procedures is performed as follows:					machine and table game departments and 5 percent for the
, ,	The re-performance of the procedures is performed as follows:					other departments completed by the internal audit
, ,						
, ,						department in compliance with the Section 23 - Internal
, ,						Audit TICS. The re-performance of the procedures is
, ,						performed as follows:
, ,						
, ,						
			543.23(d)(3)(i)(A) Completing the internal audit checklist;			
ļ!						
, ,	For inquires, the CPA should either speak with the same individual or	542.3(f)(3)(ii)(B)(1) For inquiries, the CPA should either speak with the same				For inquires, the CPA should either speak with the same-
, , ,	an individual of the same job position as the internal auditor did for	individual or an individual of the same job position as the internal auditor did for				individual or an individual of the same job position as the
, ' '	the procedure indicated in their checklist.	the procedure indicated in their checklist.				internal auditor did for the procedure indicated in their
,	'	'				checklist.
,	For observations, the CPA should observe the same process as the	542.3(f)(3)(ii)(B)(2) For observations, the CPA should observe the same process as				For observations, the CPA should observe the same process
ı ii '	internal auditor did for the procedure as indicated in their checklist.	the internal auditor did for the procedure as indicated in their checklist.				# as the internal auditor did for the procedure as indicated in
, ,						their checklist.
,	For document testing, the CPA should look at the same original	542.3(f)(3)(ii)(B)(3) For document testing, the CPA should look at the same original				For document testing, the CPA should look at the same
	-	document as tested by the internal auditor for the procedure as indicated in their				original document as tested by the internal auditor for the
		·				iii procedure as indicated in their checklist. The CPA need only
	-	checklist. The CPA need only retest the minimum sample size required in the				procedure as maleated in their checkist. The er wheed only
, ,	sample size required in the checklist.	checklist.				retest the minimum sample size required in the checklist.
I			543.23(d)(3)(i)(C )Verifying that any areas of non-		+	
 			compliance have been identified;			
_ <del></del>	The CPA is to investigate and resolve any differences between their re-	542.3(f)(3)(ii)(C) The CPA is to investigate and resolve any differences between				The CPA is to investigate and resolve any differences
С	performance results and the internal audit results.	their reperformance results and the internal audit results.				€ between their re-performance results and the internal audit
1	•					results.
	Ensure that audit reports are completed and include responses from		543.23(d)(3)(i)(D) Ensuring that audit reports are			Ensure that audit reports are completed and include
ı d	management.		completed and include responses from management;			d responses from management.
I	management.		completed and include responses from management;			- ne <del>sponses from management.</del>
	Varify that appropriate follow up as a well-findle on her hand		d1  U		<del></del>	Vorification appropriate fall account as a state for the
i i	Verify that appropriate follow-up on audit findings has been		543.23(d)(3)(i)(E) Verifying that appropriate follow-up on			Verify that appropriate follow-up on audit findings has
e	conducted and necessary corrective measures have been taken to		audit findings has been conducted and necessary			e been conducted and necessary corrective measures have
- , 1	effectively mitigate the noted risks.		corrective measures have taken to effectively mitigate			been taken to effectively mitigate the noted risks.
, ├			the noted risks.			
——————————————————————————————————————	Documentation is maintained for 5 years by the CPA indicating the	542.3(f)(3)(ii)(D) Documentation is maintained for 5 years by the CPA indicating				Documentation is maintained for 5 years by the CPA
		the procedures reperformed along with the results.				f indicating the procedures reperformed along with the
, 1	,	,				results
	When performing the procedures for part 2.7 (G) (1) (b) of this section	542.3(f)(3)(ii)(E) When performing the procedures for paragraph (f)(3)(ii)(B) of this				When performing the procedures for part 2.7 (G) (1) (b) of
		section in subsequent years, the CPA must select a different sample so that the				this section in subsequent years, the CPA must select a-
	•	CPA will reperform substantially all of the procedures after several years.				g different sample so that the CPA will re-perform
, 1	several years.					substantially all of the procedures after several years.
	Any additional procedures performed at the account of the NICO II	E42.2(A/2)(i)/E) Any additional presedures performed at the reserved of			<del></del>	Any additional procedures newformed at the second of the
. '		542.3(f)(3)(ii)(F) Any additional procedures performed at the request of the				Any additional procedures performed at the request of the
	CNGC, or management should be included in the Agreed-Upon	Commission, the Tribal gaming regulatory authority or management should be				NIGC, the CNGC, or management should be included in the
						- In the second of the second
		included in the Agreed-Upon Procedures report transmitted to the Commission.				h Agreed-Upon Procedures report transmitted to the CNGC-
h		included in the Agreed-Upon Procedures report transmitted to the Commission.				Agreed-Upon Procedures report transmitted to the CNGC- and subsequently to the NIGC.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Report Format. The NIGC has concluded that the performance of the	542.3(f)(4)(i) <b>Report Format.</b> The NIGC has concluded that the performance of	542.23(d)(4) Report format. The SSAEs are applicable to		-		Report Format. The NIGC has concluded that the
ų.	procedures is an attestation engagement in which the CPA applies	these procedures is an attestation engagement in which the CPA applies such	agreed-upon procedures engagements required in this				performance of the procedures is an attestation
ų.	such Agreed-Upon Procedures to the gaming operation's assertion	Agreed-Upon Procedures to the gaming operation's assertion that it is in	part. All noted instances of noncompliance with the				engagement in which the CPA applies such Agreed-Upon
ų.	that it is in compliance with the NIGC MICS, the CNGC TICS, and	compliance with the MICS and, if applicable under paragraph (f)(2) of this section	i i				Procedures to the gaming operation's assertion that it is in-
	approved variances, provide a level of control that equals or exceeds	the Tribal internal control standards and approved variances, provide a level of	level of controls as the MICS, must be documented in				compliance with the NIGC MICS, the CNGC TICS, and
	that of the established MICS. Accordingly, the Statements on	control that equals or exceeds that of the MICS. Accordingly, the Statements on	the report with a narrative description, the number of				approved variances, provide a level of control that equals or
	Standards for Attestation Engagements (SSAEs) specifically SSAE 10,	Standards for Attestation Engagements (SSAE's), specifically SSAE 10, issued by	exceptions and sample size tested.				exceeds that of the established MICS. Accordingly, the
ų.	issued by the Auditing Standards Board is currently applicable. SSAE	the Auditing Standards Board is currently applicable. SSAE 10 provides current,	exceptions and sample size tested.				Statements on Standards for Attestation Engagements
ų.	10 provides current, pertinent guidance regarding agreed-upon	pertinent quidance regarding agreed-upon procedure engagements, and the					(SSAEs) specifically SSAE 10, issued by the Auditing-
ų.	procedures engagements, and the sample report formats included	sample report formats included within those standards should be used, as					Standards Board is currently applicable. SSAE 10 provides
		appropriate, in the preparation of the CPA's agreed-upon procedures report. If					current, pertinent guidance regarding agreed-upon
ų.	within those standards should be used, as appropriate, in the						procedures engagements, and the sample report formats
Н	preparation of the CPAs agreed-upon procedures report. If future	future revisions are made to this standard or new SSAEs are adopted that are				Ħ	
	revisions are made to this standard or new SSAEs are adopted that	applicable to this type of engagement, the CPA is to comply with any revised					included within those standards should be used, as
ų.	are applicable to this type of engagement, the CPA is to comply with	professional standards in issuing their agreed upon procedures report. The					appropriate, in the preparation of the CPAs agreed-upon
ų.	any revised professional standards in issuing their agreed upon	Commission will provide an Example Report and Letter Formats upon request tha	TE T				procedures report. If future revisions are made to this
ų.	procedures report. The NIGC will provide an Example Report and	may be used and contain all of the information discussed below:					standard or new SSAEs are adopted that are applicable to
	Letter Formats, upon request, that may be used and contain all of the						this type of engagement, the CPA is to comply with any
ų.	information discussed as follows:						revised professional standards in issuing their agreed upon-
ų.							procedures report. The NIGC will provide an Example
ų.							Report and Letter Formats, upon request, that may be used
ų.							and contain all of the information discussed as follows:
!							
!							
	The ground ground deposits all instead of the control of the contr	FA22(P/A)///A) The area of growth described in the control of the					The report must describe all instances of procedural
!	The report must describe all instances of procedural noncompliance	542.3(f)(4)(i)(A) The report must describe all instances of procedural					
!	regardless of materiality with the MICS or approved variations, and all	noncompliance regardless of materiality) with the MICS or approved variations,					noncompliance regardless of materiality with the MICS or
ų.	instances where the CNGC TICS do not comply with the NIGC MICS.	and all instances where the Tribal gaming regulatory authority's regulations do					approved variations, and all instances where the CNGC TICS
ų.	All noted instances of non-compliance with the MICS and/or the TICS	. ,					do not comply with the NIGC MICS. All noted instances of
!	or SICS, if they provide the same level of controls as the MICS, must	performed, the CPA should also indicate whether procedures performed by other	r				non-compliance with the MICS and/or the TICS or SICS, if
!	be documented in the report with a narrative description, the number	·					they provide the same level of controls as the MICS, must
!	of exceptions, and sample size tested. When describing the agreed-	performed by the CPA. For each instance of noncompliance noted in the CPA's					be documented in the report with a narrative description,
1	upon procedures performed, the CPA should also indicate whether	agreed-upon procedures report, the following information must be included:				1	the number of exceptions, and sample size tested. When-
1	procedures performed by other individuals were utilized to substitute					*	describing the agreed-upon procedures performed, the
!	for the procedures required to be performed by the CPA. For each						CPA should also indicate whether procedures performed by
!	instance of noncompliance noted in the CPAs agreed-upon						other individuals were utilized to substitute for the
!	procedures report, the following information must be included:						procedures required to be performed by the CPA. For each-
!							instance of noncompliance noted in the CPAs agreed-upon-
ų.							procedures report, the following information must be
							<del>included:</del>
!							
	The citation of the applicable MICS for which the instance of	542.3(f)(4)(i)(A)(1)The citation of the applicable MICS for which the instance of	of				The citation of the applicable MICS for which the instance
a	noncompliance was noted.	noncompliance was noted.				<del>a</del>	of noncompliance was noted.
- h	A narrative description of noncompliance, including the number of	542.3(f)(4)(i)(A)(2) A narrative description of the noncompliance, including the				h	A narrative description of noncompliance, including the
u	exceptions and sample size tested.	number of exceptions and sample size tested.				Đ	number of exceptions and sample size tested.
2	[Reserved].					2	[Reserved].
I	Report Submission Requirements	542.3(f)(5) Report Submission Requirements.				Ŧ	Report Submission Requirements
	The CPA shall prepare a report of the findings for the CNGC, the Tribe	542.3(f)(5)(i) The CPA shall prepare a report of the findings for the Tribe and					The CPA shall prepare a report of the findings for the CNGC,
ų.	and management. The CNGC shall submit 2 copies of the report to the	management. The Tribe shall submit 2 copies of the report to the Commission no					the Tribe and management. The CNGC shall submit 2
ų.	NIGC no later than 120 days after the operation's business year. This	later than 120 days after the gaming operation's business year. This report should	1				copies of the report to the NIGC no later than 120 days
1	report should be provided in addition to any other reports required to	be provided in addition to any other reports required to be submitted to the				1	after the operation's business year. This report should be
	be submitted to the NIGC.	Commission.					provided in addition to any other reports required to be
!							submitted to the NIGC.
ų.	The CPA should maintain the work-papers supporting the report for a		r				The CPA should maintain the work-papers supporting the
2	minimum of five years. Digital storage is acceptable. The NIGC may	a minimum of five years. Digital storage is acceptable. The Commission may				2	report for a minimum of five years. Digital storage is
- 1	request access to these work- papers, through the Tribe.	request access to these work-papers, through the Tribe.					acceptable. The NIGC may request access to these work—
							papers, through the Tribe.
		542.3(f)(6) <b>CPA NIGC MICS Compliance Checklists.</b> In connection with the CPA					CPA NIGC MICS Compliance Checklists. In connection with
	CPA NIGC MICS Compliance Checklists. In connection with the CPA						
3	CPA NIGC MICS Compliance Checklists. In connection with the CPA testing pursuant to this section and as referenced therein, NIGC will	testing pursuant to this section and as referenced therein, the Commission will				3	the CPA testing pursuant to this section and as referenced
3	•					3	the CPA testing pursuant to this section and as referenced- therein, NIGC will provide CPA MICS Compliance Checklists

REF	CN TICS	542	543	CN LA 17-14§32	REF	Recommended Revisions
	Section 3 - Small and Charitable Operations			3.7.2.7.2.7.3.2.		
3.1	Small Gaming Operations					
	This document shall not apply to small gaming	542.6(a) <b>Small gaming operations.</b> This part shall not apply to small gaming operations provided that:	543.4(a) <i>Small gaming operations</i> . This part does not apply to small gaming operations provided that:			
А	permits the operation to be exempt from this	542.6(a)(1) <b>The Tribal gaming regulatory authority</b> permits the operation to be exempt from this part;	543.4(a)(1) The TGRA permits the operation to be exempt from this part;			
В	The annual gross gaming revenue of the operation does not exceed \$3 million; and	revenue of the operation does not exceed \$1	543.4(a)(2) The annual gross gaming revenue of the operation does not exceed \$3 million; and,			The annual gross gaming revenue of the operation does not exceed \$31 million; and
С	with alternate procedures that:	542.6 (a)(3) <b>The Tribal gaming regulatory authority</b> develops and the operation complies with alternate procedures that:	543.4(a)(3) The TGRA develops, and the operation complies with, alternate procedures that:			
1	Protect the integrity of games offered;	542.6(a)(3)(i) Protect the integrity of games offered; and	543.4(a)(3)(i) Protect the integrity of games offered;			
2	Safeguard the assets used in connection with the operation; and	542.6(a)(3)(ii) Safeguard the assets used in connection with the operation.	543.4(a)(3)(ii) Safeguard the assets used in connection with the operation; and			
3	Create, prepare and maintain records in accordance with Generally Accepted Accounting Principles.		543.4(a)(3)(iii) Create, prepare and maintain records in accordance with Generally Accepted Accounting Principles.			
3.2	Charitable Gaming Operations		Frinciples.			
	This document shall not apply to charitable gaming operations provided that:		3 3 ,	CN LA 17-14 §32 Charitable gaming operations are not required to be licensed by the Gaming Commission provided that:		
А	· ·	•	543.4(b)(1) All proceeds are for the benefit of a charitable organization;	CN LA 17-14 §32 (1) All proceeds are for the benefit of a charitable organization.		
В	The CNGC permits the charitable organization to be exempt from this document;	542.6(b)(2) <b>The Tribal gaming regulatory authority</b> permits the charitable organization to be exempt from this part;	543.4(b)(2) The TGRA permits the charitable organization to be exempt from this part;	CN LA 17-14 §32 (2) The Gaming Commission determines the charitable organization to be exempt from this Act.		
С		operation is operated wholly by the	543.4(b)(3) The charitable gaming operation is operated wholly by the charitable organization's agents;	CN LA 17-14 §32 (3) The charitable gaming operation is operated wholly by the charitable organizations's employees and/or volunteers.		
D	gaming operation does not exceed \$3 Million; and	542.6(b)(4) <b>The annual gross gaming revenue</b> of the charitable gaming operation does not exceed \$100,000.	543.4(b)(4) The annual gross gaming revenue of the charitable operation does not exceed \$3 million; and			The annual gross gaming revenue of the charitable gaming operation does not exceed \$3 Million 100,000; and

REF	CN TICS	542	543	CN LA 17-14§32	REF	Recommended Revisions
	Section 3 - Small and Charitable Operations					
		542.6(b)(4)(i) Where the annual gross				Where the annual gross gaming revenues of the charitable
		gaming revenues of the charitable gaming				gaming operation exceed \$100,000, but are less than \$1
		operation exceed \$100,000, but are less than			Е	million, section 3.1 above shall apply.
		\$1 million, paragraph (a) of this section shall				
		also apply; and,				
		542.6(b)(4)(ii) [Reserved]				
	The CNGC develops, and the charitable gaming	542.6(b)(5) The Tribal gaming relulatory	· ·	CN LA 17-14 §32 (4) The Gaming Commission, <u>at its sole</u>		
	operation complies, with alternate procedures that:	authority develops and the charitable	charitable gaming operation complies	<u>discretion</u> , may require the charitable organization to		
		gaming operation complies with alternate	with, alternate procedures that:	adopt procedures that protect the integrity of the gaming		
E		procedures that:		offered and that safeguard the assets used in connection		
				with the gaming operation.		
	Protect the integrity of the games offered;	542.6(b) (5)(i) Protect the integrity of the	543.4(b)(5)(i) Protect the integrity of			
1		games offered; and,	games offered;			
	Safeguard the assets used in connection with the	542.6(b)(5)(ii) Safeguard the assets used in	543.4(b)(5)(ii) Safeguard the assets used			
2	gaming operation; and	connection with the gaming operation.	in connection with the operation; and			
			542.44.75.60			
	Create, prepare and maintain records in accordance		543.4(b)(5)(iii) Create, prepare and			
3	with Generally Accepted Accounting Principles.		maintain records in accordance with			
			Generally Accepted Accounting			
2.2	Independent Operators		Principles.			
3.3	Nothing in this Section exempts gaming operations	542 (c) Independent Operators Nothing in	543.(c) <i>Independent operators</i> . Nothing			
	conducted by independent operators for the benefit		in this section exempts gaming			
	of a charitable organization.	conducted by independent operators for the	operations conducted by independent			
	or a chantable organization.		operators for the benefit of a charitable			
		benefit of a charitable organization.	organizations.			
			jorganizations.			

REF CN TICS  Section 4 - General Provisions	NIGC Class III Guidance	542.7	542.8	542.9	542.10	542.11	542.12	542 542.13	542.14	542.15	542.19	542.21	542.31	542.41	Tribal-State Compact	Recommended Revisions
4.1 Computer Applications.	BULLETIN 2018-3										542.15					
For any computer applications utilized, alternate documentation and/or		542.7(a) Computer applications.  For any computer applications	542.8(a) Computer	542.9(a) Computer	542.10(a) <u>Computer</u> <u>applications</u> . For any computer	542.11(b) Computer	542.12(a) <u>Computer</u> <u>applications</u> . For any	542.13(b) <u>Computer</u> <u>applications</u> . For any	542.14(a) <u>Computer</u> <u>applications</u> . For any	542.15(a) <u>Computer</u> <u>applications</u> . For any		542.21(a) <u>Computer</u> <u>applications</u> . For any	542.31(a) <u>Computer</u> <u>applications</u> . For any	542.41(a) <u>Computer</u> <u>applications</u> . For any		For any computer applications utilized, alternate documentation and/or procedures that provide at
procedures that provide at least the		utilized, alternate documentation	applications. For any computer application utilized,	applications. For any computer applications utilized,	applications utilized, alternate		d, computer applications utilized		computer applications utilized,				computer applications utilized	, computer applications utilized,		least the level of control described by the
level of control described by the		and/or procedures that provide at	alternate documentation	alternate documentation	documentation and/or	alternate documentation	alternate documentation	alternate documentation	alternate documentation	alternate documentation		alternate documentation	alternate documentation	alternate documentation		standards in these TICS, as approved by the
standards in these TICS, as approved by	′	least the level of control described			procedures that provide at least									e and/or procedures that provide		Cherokee Nation Gaming Commission (CNGC), w
the Cherokee Nation Gaming Commission (CNGC), will be acceptable.		by the standards in this section, as approved by the Tribal gaming			the level of control described by the standards in this section, as					at least the level of control described by the standards in		at least the level of control described by the standards in		described by the standards in		be acceptable. Computer applications shall be subject to the standards in Section 20 -
		regulatory authority, will be			approved by the Tribal gaming						2			ne this section, as approved by the	2	Information Technology.
		acceptable.	Tribal gaming regulatory	Tribal gaming regulatory	regulatory authority, will be	Tribal gaming regulatory	Tribal gaming regulatory	Tribal gaming regulatory	Tribal gaming regulatory	Tribal gaming regulatory		Tribal gaming regulatory	Tribal gaming regulatory	Tribal gaming regulatory		
			authority, will be acceptable.	authority, will be acceptable.	acceptable.	authority, will be acceptable.	authority, will be acceptable.	authority, will be acceptable.	authority, will be acceptable.	authority, will be acceptable.		authority, will be acceptable.	authority, will be acceptable.	authority, will be acceptable.		
4.2 General Provisions.																
The CNGC has established TICS that are applicable to all employees permitted																The CNGC has established TICS that are applicable to all employees agents permitted and/or licensed
and/or licensed by the CNGC.																by the CNGC.
Miles and the second of the se																
Whereas, certain parts of these standards may allow the casino																
operation to establish its own																
procedures and controls in its SICS, as																
approved by the CNGC, such procedures and controls shall be strictly																
adhered to and may not be changed																
unless approved by the CNGC.																
A																
The scope of these TICS extends to all		1														
gaming operations licensed by the																
B CNGC and covers all gaming legally																
offered by the Cherokee Nation.																
4.3 Management Reporting																
Controls must be established and																
procedures implemented to ensure																
A proper reporting by management of																
any known and material violations of the TICS.	<u> </u>	<u>                                     </u>	<u>                                     </u>		<u>                                       </u>	<u> </u>										
4.4 Variance Reporting.																
Variances. Where referenced	Variance. The operation must establish, as approved by the TGRA, the threshold level at															
throughout these TICS, the gaming operation must set a reasonable	which a variance must be reviewed to determine															
threshold, approved by CNGC, for when																
	documented. Keno §2(p)															
determine the cause, and the results of																
the review must be documented and maintained and made available to	Table Games §4(o) Gaming Machines §5(n)															
A CNGC.	Gaming Promotions and Player Tracking															
	Systems §6(d)															
	Complimentary Services or Items §7(d)															
	Patron Deposit Accounts and Cashless Systems §8(d)															
	ss(a) Lines of Credit §9(c)															
	Cage, Vault, Kiosk, Cash & Cash Equivalents															
	§10(j)															
4.5 Currency and Cash Equivalent	3.6 (133%)															
Controls.																
A Controls shall be established to ensure proper handling of tips.																
											542.19(e) Each gaming				542.19(e) Each gaming operation shall establish	Each gaming operation shall establish internal
											operation shall establish				internal control systems sufficient to ensure that	control systems sufficient to ensure that currency
											internal control systems				currency (other than tips or gratuities) received	(other than tips or gratuities) received from a
											sufficient to ensure that currency (other than tips or				from a patron in the gaming area is promptly placed in a locked box in the table, or, in the case	patron in the gaming area is promptly placed in a locked container in the table, or, in the case of a
											gratuities) received from a				of a cashier, in the appropriate place in the	cashier, in the appropriate place in the cashier's
											patron in the gaming area is				cashier's cage, or on those games which do not	cage, or on those games which do not have a
											promptly placed in a locked				have a locked drop box, or on card game tables, in	locked casino instrument storage container (CISC)
											box in the table, or, in the case				an appropriate place on the table, in the cash register or in another approved repository.	or on card game tables, in an appropriate place or the table, in the cash register or in another
											of a cashier, in the appropriate place in the cashier's cage, or				register or in another approved repository.	approved repository.
											on those games which do not					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
											have a locked drop box, or on					
											card game tables, in an					
											appropirate place on the table, in the cash register or in					
											another approved repository.					
Cash or cash equivalents exchanged	5(d)(1) Cash or cash equivalents exchanged															+
between two persons must be counted	between two persons must be counted															
independently by at least two agents	independently															
and reconciled to the recorded amounts at the end of each shift or	by at least two agents and reconciled to the recorded amounts at the end of each shift or															
	recorded amounts at the end of each shift or session. Unexplained variances must be															
documented and maintained.	documented and maintained. Unverified															
Unverified transfers of cash or cash	transfers of cash or cash equivalents are															
equivalents are prohibited.	prohibited.															
	Keno §2(g)(1)															
December 2011	E(d)(2) Procedure															
	5(d)(2) Procedures must be implemented to control cash or cash equivalents based on the															
	amount of the transaction. These procedures															
procedures must include	must include documentation by shift, session, o	1														
C documentation by shift, session, or	other relevant time period of the following:															'
	Keno \$2(g)(2)															
following:																
Inventory including and in	Kana \$2(a)(2)(i) Investory install															
<ol> <li>Inventory, including any increases or decreases;</li> </ol>	Keno §2(g)(2)(i) Inventory, including any increases or decreases;															
Transfers;	5(d)(2)(i) Transfers;															
	Keno §2(g)(2)(ii)															
	1	I .	1	1	1	1	1	1	1	1	1	1	l .	1		

REF CN TICS	NIGC Class III Guidance				P.40				Tailed State Comment	December and ad Decisions
Section 4 - General Provisions	BULLETIN 2018-3	542.7	542.8 542.9	542.10	542 542.11 542.12 542.13	542.14 542.15	542.19 542.21	542.31 542.41	Tribal-State Compact	Recommended Revisions
Exchanges, including acknowledging signatures or initials; and										
Resulting variances.	5(d)(2)(iii) Resulting variances. Keno §2(g)(2)(iv)									
4										
exchange, or transfer requires that th	ity, 5(d)(3) Any change to control of accountability, exchange, or transfer requires that the cash or									
and recorded independently by at least two agents and reconciled to the	cash equivalents be counted and recorded independently by at least two agents and reconciled to the recorded amount.								E	
recorded amount.	Keno §2(g)(3)									
4.6 Counterfeit Currency.  Controls shall be established and										
procedures implemented for identifyi and reporting counterfeit currency.	ing									
4.7 Cash Drawer Integrity.  Controls must be established and procedures implemented to ensure the state of th	he									
security and integrity of cash drawer funds.										
4.8 Signature Attestation.  When the standards in this document	• · · · · · · · · · · · · · · · · · · ·									When the standards in this document address the
address the need for signature authorizations, unless otherwise specified, that signature shall be the name of the employee or initials (as										need for signature authorizations, unless otherwise specified, that signature shall be the full name of the employee agent or initials (as required), and employee agent's identification number, in legible
required), and employee number, in legible writing.										writing.
	Supervision. Supervision must be provided as		Supervision shall be provided		542.12(h) Pit supervisory				4.9	Supervisory Line of Authority.  For each area of the gaming operation, supervision
	needed for table games operations, gaming machines operations, gaming promotions and		at all times the card room is in operation by personnel with		personnel (with authority equal to or greater than those being					must be provided as needed by an agent(s) with authority equal to or greater than those being
	player tracking, approval of complimentery		authority equal to or greaer		supervised) shall provide					supervised.
	services, patron deposit accounts and cashless systems, cage, vault, kiosk, cash and cash		than those being supervised.		supervision of all table games.				A	
	equivalents, drop and count, auditing revenue and surveillance by an agent(s) with authority equal to or greater than those being supervised.									
									В	Controls must be established and procedures implemented to safeguard assets and ensure each gaming operation provides for adequate
									5(H) Supervisory Line of Authority. The enterprise	segregation of functions, duties, and responsibilities.  The gaming operation shall provide the CNGC with
									shall provide the CNGC and State with a chart of the supervisory lines of authority with respect to those directly responsible for the conduct of	a chart of the supervisory lines of authority (i.e. organizational charts) with respect to those directly responsible for the conduct of gaming at least
									covered games, and shall promptly notify both agencies of any material changes thereto.	annually, and shall promptly notify the CNGC of any material changes. The CNGC shall provide the SCA with the proper organization charts and notify
										the SCA of any changes.  Agent(s) of the gaming operation must comply with the licensing requirements outlined in CNGC
4.9 Records.									D 4.11	Rules & Regulations, Chapter V.
In addition to other recordkeeping requirements contained in the TICS, t CNGC shall keep a record of, and sha	II .								5(C) Records. In addition to other records required to be maintained herein, the enterprise or tribe shall maintain the following records related to	In addition to other recordkeeping requirements contained in the TICS, the CNGC shall keep a record of, and shall report at least quarterly to the
report at least quarterly to the SCA, the number of covered games in each facility, by the name or type of each at its identifies a number. The coming is									implementation of this Compact in permanent form and as written or entered, whether manually or by computer, and which shall be maintained by the enterprise and made available for inspection by	SCA, the number of covered games in each facility by the name or type of each and its identifying number. The gaming operation shall be a (2) in the following recent for an less than the (2) in the state of
its identifying number. The gaming operation shall maintain the following records for no less than three (3) year from the date generated:									the enterprise and made available for inspection by the SCA for no less than three (3) years from the date generated:	following records for no less than three (3) years from the date generated:
non ac duc generated.									5(M) Records of Covered Games. The TCA shall keep a record of, and shall report at least quarterly to the SCA, the number of covered games in each	
									facility, by the name or type of each and its identifying number.	
A Payout from the conduct of all covere	ed								5(C)(2) Payout from the conduct of all covered	Payout from the conduct of all covered games;
Agames; Maintenance log for all covered game									games; 5(C)(3) Maintenance logs for all covered games	
B gaming equipment used by the gami operation;	ng								gaming equipment used by the enterprise;	

REF CN TICS	NIGC Class III Guidance							542							Tribal-State Compact	Recommended Revisions
Section 4 - General Provisions	BULLETIN 2018-3	542.7	542.8	542.9	542.10	542.11	542.12	542.13	542.14	542.15	542.19	542.21	542.31	542.41	Tibul State compact	recommended revisions
Security logs as kept in the normal	DOLLETIN LOLO 3														5(C)(4) Security logs as kept in the normal course	
course of conducting and maintaining															of conducting and maintaining security at the	
security at the facility, which at a															facility, which at a minimum shall conform to	
minimum shall conform to industry															industry practices for such reports. The security	
practices for such reports. The security															logs shall document any unusual or nonstandard	
logs shall document any unusual or															activities, occurrences or events at or related to the	
nonstandard activities, occurrences or															facility or in connection with the enterprise. Each	
events at or related to the facility or in															incident, without regard to materiality, shall be	
connection with the enterprise. Each															assigned a sequential number for each such report.	
incident, without regard to materiality,															At a minimum, the security logs shall consist of the	
shall be assigned a sequential number															following information, which shall be recorded in a	
for each such report. At a minimum, the															reasonable fashion noting:	
security logs shall consist of the																
following information, which shall be																
recorded in a reasonable fashion																
noting:																
the assigned number of the incident,															5(C)(4)(a) the assigned number of the incident,	
1																
the date of the incident,															5(C)(4)(b) the date of the incident,	
2																
the time of the incident,															5(C)(4)(c) the time of the incident,	
,																
4 the location of the incident,															5(C)(4)(d) the location of the incident,	
the nature of the incident,															5(C)(4)(e) the nature of the incident,	
the identity, including identification															5(C)(4)(f) the identity, including identification	
information, of any persons involved in the incident and any known witnesses															information, of any persons involved in the incident and any known witnesses to the incident,	
to the incident and any known witnesses to the incident, and															incident and any known witnesses to the incident,	
to the incident, and															and	
the tribal compliance officer making the		<b>+</b>						+	1					1	5(C)(4)(g) the tribal compliance officer making the	
report and any other persons															report and any other persons contributing to its	
contributing to its preparation.															preparation.	
, , , , , , , , , , , , , , , , , , ,															F - F	
All documents generated in accordance															5(C)(6) All documents generated in accordance	
with the Compact, including books and															with this Compact.	
records with respect to the conduct of																
covered games or the operation of the																
gaming operation.																
									1	1				1		

REF CN TICS	NIGC Class III Guidance	_				543								Tribal-State Compact	Recommended Revisions
Section 4 - General Provisions 4.1 Computer Applications	BULLETIN 2018-3	543.3	543.8	543.9	543.1	543.12	543.13	543.14	543.15	543.17	543.18	543.2	543.24		
For any computer applications utilized,		543.3(e) For computer applications. For any compute													
alternate documentation and/or procedures that provide at least the		applications utilized, alternate documentation and/o procedures that provide at least the level of control													
level of control described by the		established by the standards of this part, as approve													
standards in these TICS, as approved by the Cherokee Nation Gaming	′	in writing by the TGRA, will be acceptable.													
Commission (CNGC), will be acceptable.															
4.2 General Provisions The CNGC has established TICS that are															
applicable to all employees permitted															
and/or licensed by the CNGC.															
Whereas, certain parts of these standards may allow the casino		543.3 <b>SICS.</b> Each gaming operation must develop a SICS, as approved by the TGRA, to implement the	a												
operation to establish its own		TICS.													
procedures and controls in its SICS, as approved by the CNGC, such		543.3(h)(1)(2) Enforcement of Commission MICS.													
procedures and controls shall be strictly	,	Each TGRA is required to establish and implement													
adhered to and may not be changed unless approved by the CNGC.		TICS pursuant to paragraph (b) of this section. Each gaming operation is then required, pursuant to													
, , , , , , , , , , , , , , , , , , , ,		paragraph (c) of this section, to develop a SICS that													
		implements the TICS. Failure to comply with this subsection may subject the tribal operator of the													
A		gaming operation, or the management contractor, t	0												
		penalties under 25 U.S.C. 2713. (2) Enforcement action by the Commission will not be initiated under	r												
		this part without first informing the tribe and TGRA of deficiencies in the TICS or absence of SICS for its													
		gaming operation and allowing a reasonable period													
		of time to address such deficiencies. Such prior notice and opportunity for corrective action are not require	ce ad												
		where the threat to the integrity of the gaming													
		operation is immediate and severe.													
The scope of these TICS extends to all															
gaming operations licensed by the B CNGC and covers all gaming legally															
offered by the Cherokee Nation.															
4.3 Management Reporting															
Controls must be established and procedures implemented to ensure															
A proper reporting by management of any known and material violations of															
the TICS															
4.4 Variance Reporting  Variances. Where referenced	Variance. The operation must establish, as	543.3 (d) Variances. Where referenced throughout													
throughout these TICS, the gaming operation must set a reasonable	approved by the TGRA, the threshold level at	this part, the gaming operation must set a reasonab threshold, approved by the TGRA, for when a variance	re												
threshold, approved by CNGC, for when	the cause. Any such review must be	must be reviewed to determine the cause, and the													
a variance must be reviewed to determine the cause, and the results of	documented. Keno §2(p) Pari-mutuel Wagering §3(h)	results of the review must be documented and maintained.													
the review must be documented and	Table Games §4(o)														
maintained and made available to CNGC.	Gaming Machines §5(n) Gaming Promotions and Player Tracking Systems	s													
	\$6(d) Complimentary Services or Items \$7(d)														
	Patron Deposit Accounts and Cashless Systems														
	§8(d) Lines of Credit §9(c)														
	Cage, Vault, Kiosk, Cash & Cash Equivalents														
	910(j)													5(H) Supervisory Line of Authority. The enterprise	Supervisory Line of Authority. The enterprise
														shall provide the CNGC and State with a chart of	operation shall provide the CNGC and State with a
														the supervisory lines of authority with respect to those directly responsible for the conduct of	chart of the supervisory lines of authority with respect to those directly responsible for the
														covered games, and shall promptly notify both agencies of any material changes thereto.	conduct of covered games, and shall promptly notify both agencies of any material changes.
4.5 Currency and Cash Equivalent															
Controls															
A Controls shall be established to ensure proper handling of tips.															
															Each gaming operation shall establish internal control systems sufficient to ensure that currency
															(other than tips or gratuities) received from a
															patron in the gaming area is promptly placed in a locked box container in the table, or, in the case of
															a cashier, in the appropriate place in the cashier's
															cage, or on those games which do not have a locked casino instrument storage container (CISC)
															B drop box, or on card game tables, in an appropirate place on the table, in the cash register or in another
															approved repository.
	5(d)(1) Cash or cash equivalents exchanged		543.8(f)(1) Cash or cash equivalents exchanged between two												
between two persons must be counted independently by at least two agents	between two persons must be counted independently		persons must be counted independently by at least two agents and reconciled to the recorded amounts at the end of												
and reconciled to the recorded amounts	s by at least two agents and reconciled to the		each shift or session. Unexplained variances must be												
at the end of each shift or session.  Unexplained variances must be	recorded amounts at the end of each shift or session. Unexplained variances must be		documented and maintained. Unverified transfers of cash or cash equivalents are prohibited.												C
documented and maintained.	documented and maintained. Unverified transfers of cash or cash equivalents are														-
Unverified transfers of cash or cash equivalents are prohibited.	prohibited.														
	Keno §2(g)(1)														
Procedures must be implemented to	5(d)(2) Procedures must be implemented to		543.8(f)(2) Procedures must be implemented to control cash												+ +
control cash or cash equivalents based	control cash or cash equivalents based on the		or cash equivalents based on the amount of the transaction.												
procedures must include	e amount of the transaction. These procedures must include documentation by shift, session, or	r	These procedures must include documentation by shift, session, or other relevant time period of the following:												
C documentation by shift, session, or other relevant time period of the	other relevant time period of the following: Keno §2(g)(2)														U U
following:															
Inventory, including any increases or decreases:	Keno §2(g)(2)(i) Inventory, including any increases or decreases:		543.8(f)(i) Inventory, including any increases or decreases;												

Tribal-State Compact Recommended Revisions 
 543

 543.12
 543.13
 543.14
 543.15
 543.17
 543.2 543.24 543.9 543.1 543.18 d)(2)(i) Transfers eno §2(g)(2)(ii) Exchanges, including acknowledges signatures or initials; and signatures or initials; and nitials; and Geno §2(g)(2)(iii) 5(d)(2)(iii) Resulting variances 543.8(f)(1)(2)(i-iv)(3) Cash and cash equivalent controls. (1) Resulting variances. 3-43.8(I)(I)(2(I+v)(5) Cash and cash equivalent controls, (1) Cash or cash equivalents exchanged between two persons must be counted independently by at least two agents and reconciled to the recorded amounts at the end of each shift or session. Unexplained variances must be documented and maintained. Unverified transfers of cash or cash equivalents Keno §2(g)(2)(iv) are prohibited. Procedures must be implemented to control cash or cash equivalents based on amount of the transaction These procedures must include documentation by shift, These procedures must include documentation by shift, session, or other relevant time period of the following: (i) inventory, including any increases and decreases; (ii) transfers; (iii) exchanges, including acknowledging signatures or initials; and (iv) resulting variances. Any change to control of accountability, exchange, or transfer requires that the cash or cash equivalents be counted and recorded independently by at least two agents and reconclies to the recorded amount. 543.8(i)(1)(i) Vouchers. Contols must be established and procedures implemented to: (i) Verify the authenticity fo each voucher redeemed. Any change to control of accountability, sc(d)(3) Any change to control of accountability exchange, or transfer requires that the cash or cash equivalents be counted and recorded and recorded independently by at least two agents and recorded to the recorded amount. Keno \$2(g)(3) 543.8(f)(3) Any change to control of accountability, exchange or transfer requires that the cash or cash equivalents be counted and recorded independently by at least two agents and reconciled to the recorded amount. 4.6 Counterfeit Currency Controls shall be established and procedures implemented for identifyin and reporting counterfeit currency. 4.7 Cash Drawer Integrity

Controls must be established and procedures implemented to ensure the security and integrity of cash drawer funds.
4.8 Signature Attestation When the standards in this document address the need for signature authorizations, unless otherwise specified, that signature shall be the full name of the employee or initials (as required), and employee number, in 4.9 Records In addition to other recordkeeping 5(C) Records. In addition to other records require requirements contained in the TICS, the ntained in the TICS, the CNGC shall keep a reco to be maintained herein, the enterprise or tribe requirements contained in the TICS, the CNGC shall keep a record of, and shall report at least quarterly to the SCA, the number of covered games in each facility, by the name or type of each and its identifying number. The gaming operation shall maintain the following corects for an outer than the or CAL proof the CAL proof t to be maintained herein, the enterprise or tribe shall maintain the following records related to implementation of this Compact in permanent form and as written or entered, whether manually or by computer, and which shall be maintained by the enterprise and made available for inspection by the SCA for no less than three (3) years from the state construction. contained in the TICS, the CNGC shall keep a recor-of, and shall report at least quarterly to the SCA, the number of covered games in each facility, by the name or type of each and its identifying number. The gaming operation shall maintain the following records for no less than three (3) years from the date generated: records for no less than three (3) years from the date generated: date generated: 5(M) Records of Covered Games. The TCA shall SIMI) Records of covered dames. The TCA shall keep a record of, and shall report at least quarter to the SCA, the number of covered games in each facility, by the name or type of each and its identifying number. A Payout from the conduct of all covered games;
Maintenance log for all covered games 5(C)(2) Payout from the conduct of all covered games; 5(C)(3) Maintenance logs for all covered games B maintenance log for all covered games gaming equipment used by the gaming operation:
Security logs as kept in the normal course of conducting and maintaining security at the facility, which at a minimum shall conform to industry practices for such reports. The security loss is the facility countries for such reports. The security practices for such reports. The security loss is the facility of the security of the facility of SIC,1/3. Maintenance logs for all covered games gaming equipment used by the enterprise:

SIC(4) Security logs as kept in the normal course of conducting and maintaining security at the facility, which at a minimum shall conform to industry practices for such reports. The security logs shall document any unusual or nonstandard activities. logs shall document any unusual or nonstandard activities, occurrences or activities, occurrences or events at or related to the facility or in connection with the enterprise. Each nonstandard activities, occurrences or events at or related to the facility or in connection with the enterprise. Each incident, without regard to materiality shall be assigned a sequential number for each such report. At a minimum, the security logs shall consist of the following information, which shall be recorded in a reasonable fashion states. ncident, without regard to materiality, shall be assigned a sequential number for each such report At a minimum, the security logs shall consist of the following information, which shall be recorded in a reasonable fashion noting: the assigned number of the incident 5(C)(4)(a) the assigned number of the incident, G(C)(4)(b) the date of the incident, 4 the location of the incident, 5 the nature of the incident, 5(C)(4)(d) the location of the incident, the identity, including identification information, of any persons involved in information, of any persons involved in the incid the incident and any known witnesses to the incident, and and any known witnesses to the incident, and the tribal compliance officer making the report and any other persons 5(C)(4)(g) the tribal compliance officer making the report and any other persons contributing to its contributing to its preparation. All documents generated in accordanc with the Compact, including books and records with respect to the conduct of covered games or the operation of the gaming operation. 5(C)(6) All documents generated in accordance with this Compact.

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
5.1	Supervision.			
	Supervision must be provided as needed for	543.8(a) <i>Supervision</i> . Supervision must be provided as needed		Supervision must be provided as needed for
	bingo operations by an agent(s) with authority	for bingo operations by an agent(s) with authority equal to or		bingo operations by an agent(s) with authority
	equal to or greater than those being supervised.	greater than those being supervised.		equal to or greater than those being supervised.
5.2	Bingo Card Inventory.	543.8(b) Bingo cards.	<del>5.2</del> 5.1	Bingo Card Inventory.
	Physical bingo card inventory controls must	543.8(b)(1) Physical bingo card inventory controls must address		
	address the placement of orders, receipt,	the placement of orders, receipt, storage, issuance, removal, and		
Α	storage, issuance, removal, and cancellation of	cancellation of bingo card inventory to ensure that:		
	bingo card inventory to ensure that:			
	The bingo card inventory can be accounted for	543.8(b)(1)(i) The bingo card inventory can be accounted for at		
1	at all times; and	all times; and		
	Bingo cards have not been marked, altered, or	543.8(b)(1)(ii) Bingo cards have not been marked, altered, or		
2	otherwise manipulated.	otherwise manipulated.		
	·	·		
	When bingo card inventory is initially received	543.8(b)(2)(i) Receipt from supplier. When bingo card inventory		
	from the supplier, it must be inspected (without	is initially received from the supplier, it must be inspected		
D D	breaking the factory seals, if any), counted,	(without breaking the factory seals, if any), counted, inventoried,		
В	inventoried, and secured by an authorized	and secured by an authorized agent.		
	agent.			
	,	543.8(b)(2)(ii) Bingo card inventory records must include the		
С	•	date received, quantities received, and the name of the individual		
	of the individual conducting the inspection.	conducting the inspection.		
	Bingo cards must be maintained in a secure	543.8(b)(3)(i) <i>Storage</i> . Bingo cards must be maintained in a		
	location, accessible only to authorized agents,	secure location, accessible only to authorized agents, and with		
D	and with surveillance coverage adequate to	surveillance coverage adequate to identify persons accessing the		
	identify persons accessing the storage area.	storage area.		
	For Tier A operations, bingo card inventory may	543.8(b)(3)(ii) For Tier A operations, bingo card inventory may be		
	be stored in a cabinet, closet, or other similar	stored in a cabinet, closet, or other similar area; however, such		
E	area; however, such area must be secured and	area must be secured and separate from the working inventory.		
	separate from the working inventory.			

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
F	Controls must be established for the issuance and return of bingo card inventory. Records signed by the issuer and recipient must be created under the following events:	543.8(b)(4)(i) Issuance and returns of inventory. Controls must be established for the issuance and return of bingo card inventory. Records signed by the issuer and recipient must be created under the following events:		
1	Issuance of inventory from storage to a staging area;	543.8(b)(4)(i)(A) Issuance of inventory from storage to a staging area;		
2	Issuance of inventory from a staging area to the cage or sellers;	543.8(b)(4)(i)(B) Issuance of inventory from a staging area to the cage or sellers;		
3	Return of inventory from a staging area to storage; and	543.8(b)(4)(i)(C) Return of inventory from a staging area to storage; and		
4	Return of inventory from cage or seller to staging area or storage.	543.8(b)(4)(i)(D) Return of inventory from cage or seller to staging area or storage.		
G	Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensure that they are not utilized in the play of a bingo game.	543.8(b)(5)(i) Cancellation and removal. Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensure that they are not utilized in the play of a bingo game. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.		
Н	Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.	543.8(b)(5)(i) Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled to ensurethat they are not utilized in the play of a bingo game. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.		
I	Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy.	543.8(b)(5)(ii) Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy.		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
		543.8(b)(6)(i) Logs. The inventory of bingo cards must be tracked		
		and logged from receipt until use or permanent removal from		
J	removal from inventory.	inventory.		
	,	,		
	The bingo card inventory record(s) must include:	543.8(b)(6)(ii) The bingo card inventory record(s) must include:		
K				
1	Date;	543.8(b)(6)(ii)(A) Date;		
2	Shift or session;	543.8(b)(6)(ii)(B) Shift or session;		
3	Time;	543.8(b)(6)(ii)(C) Time;		
4	Location;	543.8(b)(6)(ii)(D) Location;		
5	Inventory received, issued, removed, and	543.8(b)(6)(ii)(E) Inventory received, issued, removed, and		
	returned;	returned;		
	Signature of agent performing transaction;	543.8(b)(6)(ii)(F) Signature of agent performing transaction;		
6				
	Cianatura of agent performing the reconciliation	E42.9(b)(6)(ii)(C) Signature of agent performing the		
7	Isignature of agent performing the reconciliation,	543.8(b)(6)(ii)(G) Signature of agent performing the		
	Any variance;	reconciliation; 543.8(b)(6)(ii)(H) Any variance;		
8	Arry variance,	343.0(b)(0)(li)(\(\pi\)) Ally variance,		
	Beginning and ending inventory; and	543.8(b)(6)(ii)(I) Beginning and ending inventory; and		
9	beginning and chang inventory, and	3-3.5(b)(o)(ii)(i) beginning and ending inventory, and		
	Description of inventory transaction being	543.8(b)(6)(ii)(J) Description of inventory transaction being		
10	performed.	performed.		
5.3	Bingo Card Sales/Distribution.	543.8(c) Bingo card sales.	<del>5.3</del> 5.2	Bingo Card Sales/Distribution.
	Agents who sell or distribute bingo cards must	543.8(c)(1) Agents who sell bingo cards must not be the sole		
Α	not be the sole verifier of bingo cards for prize	verifier of bingo cards for prize payouts.		
	payouts.			
	In order to adequately record, track, and	543.8(c)(2) Manual bingo card sales: In order to adequately		
В	reconcile sales/inventory of bingo cards the	record, track, and reconcile sales of bingo cards, the following		
	following information must be documented:	information must be documented:		
1	Date;	543.8(c)(2)(i) Date;		
2	Shift or session;	543.8(c)(2)(ii) Shift or session;		
	Number of bingo cards issued, sold, and	543.8(c)(2)(ii) Number of bingo cards issued, sold, and returned;		
3	returned;			
4	Dollar amount of bingo card sales;	543.8(c)(2)(iv) Dollar amount of bingo card sales;		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
5	Signature or initials and identification number of the agent preparing the record; and	543.8(c)(2)(v) Signature, initials, or identification number of the agent preparing the record; and		
6	Signature or initials and identification number of the independent agent who verified the bingo cards returned to inventory and dollar amount of the bingo card sales.	543.8(c)(2)(vi) Signature, initials, or identification number of an independent agent who verified the bingo cards returned to inventory and dollar amount of bingo card sales.		
С	Bingo card sale voids must be processed in accordance with the rules of the game and established controls that must include the following:	543.8(c)(3) Bingo card sale voids must be processed in accordance with the rules of the game and established controls that must include the following:		
1	Patron refunds;	543.8(c)(3)(i) Patron refunds;		
2	Adjustments to bingo card sales to reflect voids;	543.8(c)(3)(ii) Adjustments to bingo card sales to reflect voids;		
3	Adjustment to bingo card inventory;	Adjustment to bingo card inventory; 543.8(c)(3)(iii)		
4	Documentation of the reason for the void; and	543.8(c)(3)(iv) Documentation of the reason for the void; and		
5	Authorization for all voids.	543.8(c)(3)(v) Authorization for all voids.		
5.4	Draw.	543.8(d) <i>Draw</i> .	<del>5.</del> 45.3	Draw.
А	used in the conduct of the bingo game are	543.8(d)(1) <i>Draw.</i> Controls must be established and procedures implemented to ensure that all eligible objects used in the conduct of the bingo game are available to be drawn and have not been damaged or altered. Verification of physical objects must be performed by two agents before the start of the first bingo game/session. At least one of the verifying agents must be a supervisory agent or independent of the bingo games department.		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
	Verification of physical objects must be	543.8(d)(1) <i>Draw</i> . Controls must be established and procedures		
	T	implemented to ensure that all eligible objects used in the		
	first bingo game/session. At least one of the	conduct of the bingo game are available to be drawn and have		
		not been damaged or altered. <b>Verification of physical objects</b>		
В		must be performed by two agents before the start of the		
		first bingo game/session. At least one of the verifying agents		
		must be a supervisory agent or independent of the bingo		
		games department.		
	Where the selection is made through an	543.8(d)(2) Where the selection is made through an electronic		
		aid, certification in accordance with 25 CFR 547.14 is acceptable		
С		for verifying the randomness of the draw and satisfies the		
		requirements of paragraph (d)(1) of this section.		
	requirements of paragraph 5.4(A)–(B) of this			
	section.	542 0/d//2). Controls result be established and respectives		
	Controls must be established and procedures implemented to provide a method of recall of	543.8(d)(3) Controls must be established and procedures implemented to provide a method of recall of the draw, which		
		includes the order and identity of the objects drawn, for dispute		
D	of the objects drawn, for dispute resolution	resolution purposes.		
	purposes.	resolution purposes.		
	parposos.			
	Controls must be established and procedures	543.8(d)(4) <i>Verification and display of draw</i> . Controls must be		
E	implemented to ensure that:	established and procedures implemented to ensure that:		
	The identity of each object drawn is accurately	543.8(d)(4)(i) The identity of each object drawn is accurately		
	recorded and transmitted to the participants.	recorded and transmitted to the participants. The procedures		
1	The procedures must identify the method used	must identify the method used to ensure the identity of each		
	to ensure the identity of each object drawn.	object drawn.		
	For all games offering a prize payout of \$1,200	543.8(d)(4)(ii) For all games offering a prize payout of \$1,200 or		
		more, as the objects are drawn, the identity of the objects are		
2		immediately recorded and maintained for a minimum of 24		
		hours.		
	D: D	542.0( ) D:	F F F 4	D: D
5.5	Prize Payouts.	543.8(e) Prize payout.	<del>5.5</del> 5.4	Prize Payouts.

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
А	Controls must be established and procedures implemented for cash or cash equivalents that address the following:	543.8(e)(1) Controls must be established and procedures implemented for cash or cash equivalents that address the following:		
1	Identification of the employee authorized (by position) to make a payout;	543.8(e)(1)(i) Identification of the agent authorized (by position) to make a payout;	1	Identification of the employee agent authorized (by position) to make a payout;
2	Predetermined payout authorization levels (by position) to make a payout; and	543.8(e)(1)(ii) Predetermined payout authorization levels (by position); and		
3	Documentation procedures ensuring separate control of the cash accountability functions.	543.8(e)(1)(iii) Documentation procedures ensuring separate control of the cash accountability functions.		
В	Controls must be established and procedures implemented to verify that the following is valid for the game in play prior to payment of a winning prize:	543.8 (e)(2)(i) <i>Verification of validity</i> . Controls must be established and procedures implemented to verify that the following is valid for the game in play prior to payment of a winning prize:		
1	Winning card(s);	543.8(e)(2)(i)(A) Winning card(s);		
2	Objects drawn; and	543.8(e)(2)(i)(B) Objects drawn; and		
3	The previously designated arrangement of numbers or designations on such cards, as described in 25 U.S.C. 2703 (7) (A).	543.8(e)(2)(i)(C) The previously designated arrangement of numbers or designations on such cards, as described in 25 U.S.C. 2703(7)(A).		
С	At least two agents must verify that the card, objects drawn, and previously designated arrangement were valid for the game in play.	543.8(e)(2)(ii) At least two agents must verify that the card, objects drawn, and previously designated arrangement were valid for the game in play.		
D	Where an automated verification method is available, verification by such method is acceptable.	543.8(e)(2)(iii) Where an automated verification method is available, verification by such method is acceptable.		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
	For manual payouts, at least two agents must determine the validity of the claim and verify that the winning pattern has been achieved on the winning card prior to payment of a prize.	543.8(e)(3)(i) Validation. For manual payouts, at least two agents must determine the validity of the claim prior to the payment of a prize. The system may serve as one of the validators.		
Е		543.8(e)(4)(i) Verification. For manual payouts, at least two agents must verify that the winning pattern has been achieved on the winning card prior to the payment of a prize. The system may serve as one of the verifiers.		
F	For manual payouts, a computer validation/verification system may serve as one of the validators/verifiers.	543.8(e)(4)(i) <i>Verification</i> . For manual payouts, at least two agents must verify that the winning pattern has been achieved on the winning card prior to the payment of a prize. <b>The system may serve as one of the verifiers.</b> 543.8(e)(3)(i) Verification. For manual payouts, at least two agents must determine the validity of the claim prior to the		
		payment of a prize. The system may serve as one of the validators.		
	For automated payouts, the system may serve as the sole validation/verification method.	543.8(e)(3)(ii) For automated payouts, the system may serve as the <b>sole validator</b> of the claim.		
G		543.8(e)(4)(ii) For automated payouts, the system may serve as the <b>sole verifier</b> that the pattern has been achieved on the winning card.		
Н	At least two agents must authorize, sign, and witness all manual prize payouts above \$1,200, or a lower threshold as authorized by management and approved by CNGC.	543.8(e)(5)(i) <i>Authorization and signatures</i> . At least two agents must authorize, sign, and witness all manual prize payouts above \$1,200, or a lower threshold as authorized by management and approved by the TGRA.		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
I	Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by TGRA) must require one of the two signatures and	543.8(e)(5)(ii) Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by TGRA) must require one of the two signatures and verifications to be a supervisory or management employee independent of the operation of Class II Gaming System bingo:		Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by CNGC TGRA) must require one of the two signatures and verifications to be a supervisory or management employee independent of the operation of Class-II Gaming System bingo:
1	Five Thousand Dollars (\$5,000) for a Tier A facility;	543.8(e)(5)(ii)(A) \$5,000 for a Tier A facility;		
2	Ten Thousand Dollars (\$10,000) for a Tier B facility;	543.8(e)(5)(ii)(B) \$10,000 at a Tier B facility;		
3	Twenty Thousand Dollars (\$20,000) for a Tier C facility; or	543.8(e)(5)(ii)(C) \$20,000 for a Tier C facility; or		
4	Fifty Thousand Dollars (\$50,000) for a Tier C facility with over \$100,000,000 in gross gaming revenues.	543.8(e)(5)(ii)(D) \$50,000 for a Tier C facility with over \$100,000,000 in gross gaming revenues.		
J	A gaming system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.	543.8(e)(5)(iv) A Class II gaming system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.		A gaming system computer validation/verification system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.
К	•	543.8(e)(5)(iii) The predetermined thresholds, whether set at the MICS level or lower, must be authorized by management, approved by the TGRA, documented, and maintained.		
L	Payout records, including manual payout records, must include the following information:	543.8(e)(6) Payout records, including manual payout records, must include the following information:		
1	Date and time;	543.8(e)(6)(i) Date and time;		
2	Amount of the payout (alpha & numeric for player interface payouts); and	543.8(e)(6)(ii) Amount of the payout (alpha & numeric for player interface payouts); and		Amount of the payout (alpha & numeric for player interface payouts); and
3	Bingo card identifier or player interface identifier.	543.8(e)(6)(iii) Bingo card identifier or player interface identifier.		Bingo card identifier or player interface identifier.
4	Game name or number;	543.8(e)(6)(iv)(A) Game name or number;		

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
5	Description of the pattern covered (e.g. cover-all or four corners);	543.8(e)(6)(iv)(B) Description of pattern covered, such as coverall or four corners;		
6	Signature of all, but not less than two, agents involved in the transaction;	543.8(e)(6)(iv)(C) Signature of all, but not less than two, agents involved in the transaction;		
7	For override transactions, verification by a supervisory or management agent independent of the transaction; and	543.8(e)(6)(iv)(D) For override transactions, verification by a supervisory or management agent independent of the transaction; and		
8	Any other information necessary to substantiate the payout.	543.8(e)(6)(iv)(E) Any other information necessary to substantiate the payout.		
М	Cash payout limits shall be established in accordance with the Gaming machine payout standards in Section 11 – Casino Instruments.			Cash payout limits shall be established in- accordance with the Gaming machine payout standards in Section 11 — Casino Instruments.
5.6	Technological Aids and Bingo Equipment.		<del>5.6</del> 5.5	Technological Aids and Bingo Equipment.
A	technological aids and bingo equipment used in the play of bingo during installations, operations, modifications, removal and retirements. Such procedures must include shipping and receiving; access credential control	543.8(g)(1-9) Technologic aids to the play of bingo. Controls must be established and procedures implemented to safeguard the integrity of technologic aids to the play of bingo during installations, operations, modifications, removal and retirements. Such procedures must include the following: (1) Shipping and receiving. (2) Access credential control methods. (3) Recordkeeping and audit processes. (4) System software signature verification. (5) Installation testing. (6) Display of rules and necessary disclaimers. (7) TGRA approval of all technologic aids before they are offered for play. (8) All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games; and (9) Dispute resolution.	A	Controls must be established and procedures implemented to safeguard the integrity of technological aids and bingo equipment used in the play of live bingo during installations, operations, modifications, removal and retirements. Such procedures must include shipping and receiving; access credential control methods; recordkeeping and audit processes; software system signature verification; installation testing; display of rules and necessary disclaimers; CNGC approval of technological aids before they are offered for play; compliance with Class II Technical Standards 25 CFR Part 547; and dispute resolution.

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
		543.8(g) Such procedures must include the following:		Such procedures must include the following:
			В	
		543.8(g)(1) Shipping and receiving.	1	Shipping and receiving;
		543.8(g)(2) Access credential control methods;	2	Access credential control methods;
		543.8(g)(3) Recordkeeping and audit processes;	3	Recordkeeping and audit processes;
		543.8(g)(4) System software signature verification.	4	Software system signature verification;
		543.8(g)(5) Installation testing;	5	Installation testing;
		543.8(g)(6) Display of rules and necessary disclaimers; and	6	Display of rules and necessary disclaimers; and
		543.8(g)(9) Dispute resolution procedures.	7	Dispute resolution procedures.
				The CNGC must approve alof technological aids
			С	before they are utilized with or in conjunction
				with the play of live bingo games.
	Technological aids and certain bingo equipment			
	used in live bingo are subject to the standards in			
	Section 7 - Gaming Systems in regards to			
В	Independent Testing Lab (ITL) certification,		D	
	CNGC approval, installations, operations,			
	modifications, removal and retirement (as			
	applicable).			
	For equipment malfunctions, procedures must	Operations. Malfunctions. Procedures must be implemented to		
	be implemented to investigate, document, and	investigate, document and resolve malfunctions. Such		
С	resolve malfunctions. Such procedures must	procedures must address the following:	E	
	address the following:	543.8 (h)(1)		
	Determination of the event causing the	543.8(h)(1)(i) Determination of the event causing the		
1	malfunction;	malfunction;	1	
<u></u>				
2	Review of relevant records, game recall, reports,	543.8 (h)(1)(ii) Review of relevant records, game recall, reports,	2	
	logs, surveillance records;	logs, surveillance records;	۷	
]	Repair or replacement of the component or	543.8(h)(1)(iii) Repair or replacement of the Class II gaming		
3	equipment; and	component;	3	
	3 , .		_	
4	equipment before restoring to operation.	component before restoring it to operation; and	4	

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
		543.8(h)(2) Procedures must be implemented to retire or remove any or all associated components of a Class II gaming system from operation. Procedures must include the following:	F	Procedures must be implemented to retire or remove any or all associated components of a Class II gaming system from operation.  Procedures must include the following:
		543.8(h)(2)(iii) For other related equipment such as blowers, cards, interface cards: 543.8(h)(2)(iii)(A) Remove and/or secure equipment; and 543.8(h)(2)(iii)(B) Document the removal or securing of	1 a b	For related equipment such as blowers, cards, interface cards:  Remove and/or secure equipment; and  Document the removal/securing of equipment.
		equipment.		ID II
D	to adequately record track and reconcile sales of bingo cards, the following information must be	543.8(c)(4) Class II gaming system bingo card sales. In order to adequately record, track and reconcile sales of bingo cards, the following information must be documented from the server (this is not required if the system does not track the information, but system limitation(s) must be noted):	D D	[Reserved].  Class II gaming system bingo card sales. In order to adequately record track and reconcile sales of bingo cards, the following information must be documented from the server (this is not required if the system does not track the information, but the system limitation(s) must be noted):
1	Date;	543.8(c)(4)(i) Date;	1	<del>Date;</del>
2	Time;	543.8(c)(4)(ii) Time;	2	Time;
3	Number of bingo cards sold;	543.8(c)(4)(iii) Number of bingo cards sold;	3	Number of bingo cards sold;
4	Dollar amount of bingo card sales; and,	543.8(c)(4)(iv) Dollar amount of bingo card sales; and	4	Dollar amount of bingo card sales; and,
5	Amount in, amount out, and other associated meter information.	543.8(c)(4)(v) Amount in, amount out and other associated meter information.	<del>5</del>	Amount in, amount out, and other associated meter information.
5.7	Variances.		<del>5.7</del> 5.6	Variances.
	variance, including deviations from the	543.8(I) <i>Variance</i> . The operation must establish, as approved by the TGRA, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 CFR 547.4, will be reviewed to determine the cause. Any such review must be documented.		The operation must establish, as approved by the CNGC, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 C.F.R. 547.4, will be reviewed to determine the cause. Any such review must be documented.
5.8	Other Standards.		<del>5.8</del> 5.7	Other Standards.
		543.8(j) All relevant controls from §543.20, Information and Technology will apply.	А	All relevant controls for Information Technology related to live bingo are contained in Section 20 Information Technology.

REF	CN TICS	543	REF	Recommended Revisions
	Section 5 - Live Bingo			
	Standards for revenue audit of bingo are	543.8(k) Revenue Audit. Standards for revenue audit of bingo		
Α	contained in Section 21 Auditing Revenue.	are contained in §543.24, Revenue Audit.	В	
В	Currency and cash equivalent controls for bingo			
D	are contained in Section 4.5.		C	

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
6.1	Supervision				
	Supervision must be provided as needed for		543.9(a) <i>Supervision</i> . Supervision		Supervision must be provided as
	pull tab operations and over pull tab storage		must be provided as needed for pull		needed for pull tab operations and
	areas by an agent(s) with authority equal to or		tab operations and over pull tab		over pull tab storage areas by an-
	greater than those being supervised.		storage areas by an agent(s) with		agent(s) with authority equal to or
			authority equal to or greater than		greater than those being supervised.
			those being supervised.		
6.2	Pull Tab Inventory			6.1	
	Pull tab inventory (including unused tickets)	542.8(b)(1) <b>Pull tab inventory.</b> Pull			
	shall be controlled to assure the integrity of	tab inventory (including unused tickets)			
	pull tabs. Controls must be established and	shall be controlled to assure the			
	procedures implemented to ensure that:	integrity of the pull tabs.			
	Access to pull tabs is restricted to authorized	542.8(c) <u>Access.</u> Pull to pull tabs shall	543.9(b)(1) Pull tab inventory. Access		Access to pull tabs is restricted to
А	employees;	be restricted to authorized persons.	to pull tabs is restricted to authorized agents.		authorized agents employees;
	The pull tab inventory is controlled and secured	542.8(b)(2) Purchased pull tabs shall	543.9(b)(2) The pull tab inventory is		The pull tab inventory is controlled and
В	by employees independent of pull tab sales;	be inventoried and secured by a	controlled by agents independent of		secured by agents employees
Ь		person or persons independent of the	pull tab sales;		independent of pull tab sales;
		pull tab sales.			
	Transfers of pull tabs from storage to the sale	542.8(d) <i>Transfers</i> . Transfers of pull	543.9(b)(3) Pull tabs exchanged		Transfers of pull tabs from storage to
	location, including pull tabs exchanged	tabs from storage to the sale location	between agents are secured and		the sale location, including pull tabs
С	between employees, are secured and	shall be secured and independently	independently controlled;		exchanged between agents employees,
	independently controlled;	controlled.			are secured and independently
					controlled;
	Increases or decreases to pull tab inventory are		543.9(b)(4) Increases or decreases to		
D	recorded, tracked and reconciled; and		pull tab inventory are recorded,		
			tracked, and reconciled; and		

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
E	Pull tabs are maintained in a secure location, accessible only to authorized employees, and with surveillance coverage adequate to identify persons accessing the area.		543.9(b)(5) Pull tabs are maintained in a secure location, accessible only to authorized agents, and with surveillance coverage adequate to identify persons accessing the area.		Pull tabs are maintained in a secure location, accessible only to authorized agents employees, and with surveillance coverage adequate to identify persons accessing the area.
6.3	Pull Tab Sales			6.2	
А	Controls must be established and procedures implemented to record, track, and reconcile all pull tab sales and voids.		543.9(c)(1) <i>Pull tab sales</i> . Controls must be established and procedures implemented to record, track, and reconcile all pull tab sales and voids.		
В	The issue of pull tabs to the cashier or sales location shall be documented and signed for by the person responsible for inventory control and the cashier. The document log shall include the serial number of the pull tabs issued. Electronic verification satisfies this requirement.	542.8(b)(3) The issue of pull tabs to the cashier or sales location shall be documented an signed for by the person responsible for inventory control and the cashier. The document log shall include the serial number of the pull tabs issued.			
С	Appropriate documentation shall be given to the redemption booth for purposes of determining if the winner purchased the pull tab from the pull tabs issued by the gaming operation. Electronic verification satisfies this requirement.	542.8(b)(4) <b>Appropriate documentation shall</b> be given to the redemption booth for purposes of determining if the winner purchased the pull tab from the pull tabs issued by the gaming operation. Electronic verification satisfies this requirement.			

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
D	When pull tab sales are recorded manually, total sales must be verified by an employee independent of the pull tab sales being verified.		543.9(c)(2) When pull tab sales are recorded manually, total sales must be verified by an agent independent of the pull tab sales being verified.		When pull tab sales are recorded manually, total sales must be verified by an employee agent independent of the pull tab sales being verified.
E	No person may have unrestricted access to pull tab sales records.		543.9(c)(3) No person may have unrestricted access to pull tab sales records.		
F	Controls must be established and procedures implemented to record, track, and reconcile all redeemed pull tabs and pull tab payouts. Winning pull tabs shall be verified and paid as follows:	542.8(e)(1) Winning pull tabs. Winning pull tabs shall be verified and paid as follows:	543.9(d)(1) Winning pull tabs. Controls must be established and procedures implemented to record, track, and reconcile all redeemed pull tabs and pull tab payouts.		
1	Payouts in excess of a dollar amount determined by the gaming operation, as approved by the CNGC, shall be verified by at least two employees.	542.8(e)(1)(i) Payouts in excess of a dollar amount determined by the gaming operation, as approved by the Tribal gaming regulatory authority, shall be verified by at least two employees.			Payouts in excess of a dollar amount determined by the gaming operation, as approved by the CNGC, shall be verified by at least two agents employees.
2	The winning pull tabs shall be voided so that they cannot be presented for payment again.	iembiovees.	543.9(d)(2) The redeemed pull tabs must be defaced so that they cannot be redeemed for payment again.		

REF	CN TICS	542	543	REF	<b>Recommended Revisions</b>
	Section 6 - Pull Tabs				
		542.8(e)(2) <b>Personnel independent</b> of			
		pull tab operations shall verify the			
	redeemed each day. At the end of each month,	J			
	1	each day.			
	sales and inventory control shall verify the				
	accuracy of the ending balance in the pull tab				
G	control by reconciling the pull tabs on hand.	542.8(b)(5) At the end of each			
		month, a person or persons			
		independent of pull tab sales and			
		inventory control shall verify the			
		accuracy of the ending balance in the			
		pull tab control by reconciling the pull			
		tabs on hand.			
	A monthly comparison for reasonableness shall	542.8(b)(6) A monthly comparison			
	be made of the amount of pull tabs sold from	for reasonableness shall be made of			
Н	the pull tab control log to the amount of	the amount of pull tabs sold from the			
	revenue recognized.	pull tab control log to the amount of			
		revenue recognized.			
	The redeemed pull tabs must be defaced so	542.8(e)(1)(iii) The winning pull tabs			_
T		shall be voided so that they cannot be			
1	again.	presented for payment again.			

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
J	Pull tabs that are uniquely identifiable with a machine readable code (including, but not limited to a barcode) may be redeemed, reconciled, and stored by kiosks without the need for defacing, so long as the redeemed pull tabs are secured and destroyed after removal from the kiosk in accordance with the procedures approved by the CNGC.		Pull tabs that are uniquely identifiable with a machine readable code (including, but not limited to a barcode) may be redeemed, reconciled, and stored by kiosks without the need for defacing, so long as the redeemed pull tabs are secured and destroyed after removal from the kiosk in accordance with the procedures approved by the TGRA. 543.9(d)(3)		
К	At least two (2) employees must document and verify all prize payouts above Six Hundred Dollars (\$600.00) or lower threshold as authorized by management and approved by the CNGC.		543.9(d)(4) At least two agents must document and verify all prize payouts above \$600, or lower threshold as authorized by management and approved by the TGRA.		At least two (2) employees agents must document and verify all prize payouts above Six Hundred Dollars (\$600.00) or lower threshold as authorized by management and approved by the CNGC.
1	An automated method may substitute for one (1) verification.		543.9(d)(4)(i) An automated method may substitute for one verification.		
2	The predetermined threshold must be authorized by management, approved by the CNGC, documented, and maintained.		543.9(d)(4)(ii) The predetermined threshold must be authorized by management, approved by the TGRA, documented, and maintained.		
L	Total payout must be calculated and recorded by shift.	542.8(e)(1)(ii) Total payout shall be computed and recorded by shift.	543.9(d)(5) Total payout must be calculated and recorded by shift.		
6.4	Pull Tab Operating Funds			6.3	

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
А	All funds used to operate the pull tab game must be accounted for and recorded on an accountability form and all transfers of cash and/or cash equivalents must be verified.	542.8(f)(1) Accountability form. All funds used to operate the pull tab game shall be recorded on an accountability form.	543.9(e)(1) Pull tab operating funds. All funds used to operate the pull tab game must be accounted for and recorded and all transfers of cash and/or cash equivalents must be verified.		
В	All funds used to operate the pull tab game must be independently counted and verified by at least two (2) employees and reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are prohibited.	All funds used to operate the pull tab game shall be counted independently by at least two persons and reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are prohibited. (Revised August 12, 2005) 542.8(f)(2)	All funds used to operate the pull tab game must be independently counted and verified by at least two agents and reconciled to the recorded amounts at the end of each shift or session.  543.9(e)(2)		All funds used to operate the pull tab game must be independently counted and verified by at least two (2) employees agents and reconciled to the recorded amounts at the end of each shift or session. Unverified transfers of cash and/or cash equivalents are prohibited.
6.5	Statistical Records			6.4	
А	Statistical records must be maintained, including (for games sold in their entirety or removed from play) win, write (sales), and a winto-write hold percentage as compared to the expected hold percentage derived from the flare for each deal or type of game for each shift, day, month-to-date, and year-to-date as applicable.	542.8(g)(1)(i)(ii)(iii)(iv) Standards for statistical reports. Records shall be maintained, which include win, write (sales), and a win-to-write hold percentage as compared to the theoretical hold percentage derived from the flare, for each deal or type of game, for: (i) Each shift; (ii) Each day; (iii) Month-to-date; and (iv) Year-to-date or fiscal year-to-date as applicable.	543.9(f)(1) Statistical records. Statistical records must be maintained, including (for games sold in their entirety or removed from play) a win-to-write hold percentage as compared to the expected hold percentage derived from the flare.		

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
В		542.8(g)(2) <b>A manager independent</b> of the pull tab operations shall review statistical information at least on a monthly basis and shall investigate any large or unusual statistical fluctuations. These investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	543.9(f)(2) A manager independent of the pull tab operations must review statistical information when the pull tab deal has ended or has been removed from the floor and must investigate any unusual statistical fluctuations. These investigations must be documented, maintained for inspection, and provided to the TGRA upon request.		
С	Each month, the actual hold percentage shall be compared to the theoretical hold percentage. Any significant variations (3%) or higher, shall be investigated.	542.8(g)(3) <b>Each month</b> , the actual hold percentage shall be compared to the theoretical hold percentage. Any significant variations (3%) shall be investigated.			
6.6	Electronic Equipment			6.5	
А	If the gaming operation utilizes electronic equipment in connection with the play of pull tabs, then the following standards shall also apply.	542.8(h)(1) <i>Electronic equipment</i> . If the gaming operation utilizes electronic equipment in connection with the play of pull tabs, then the following standards shall also apply.			
1	If the electronic equipment contains a bill acceptor, then §542.21(e) and (f), §542.31(e) and (f), or §542.41(e) and (f) (as applicable) shall apply.	542.8(h)(1)(i) If the electronic equipment contains a bill acceptor, then §542.21(e) and (f), §542.31(e) and (f), or §542.41(e) and (f) (as applicable) shall apply. [Revised May 4, 2005]			

REF	CN TICS	542	543	REF	Recommended Revisions
	Section 6 - Pull Tabs				
	If the electronic equipment uses a bar code or	542.8(h)(1)(ii) If the electronic			
	microchip reader, the reader shall be tested	equipment uses a bar code or			
2	periodically to determine that it is correctly	microchip reader, the reader shall be			
	reading the bar code or microchip.	tested periodically to determine that it			
		is correctly reading the bar code or			
		microchip.			
	If the electronic equipment returns a voucher or	, , , , ,			
	a payment slip to the player, then §542.13(n)	equipment returns a voucher or a			
3	(as applicable) shall apply.	payment slip to the player, then			
		§542.13(n)(as applicable) shall apply.			
	If the electronic equipment utilizes patron	542.8(h)(1)(iv) If the electronic			
	account access cards for activation of play, then	equipment utilizes patron account			
4	§542.13(o) (as applicable) shall apply.	access cards for activation of play, then			
		§542.13(o) (as applicable) shall apply.			
		(2) [Reserved]			
6.7	Revenue Audit			6.6	
	Standards for revenue audit of pull tabs are		543.9(g) <i>Revenue audit</i> . Standards for		
	contained in Section 21 – Auditing Revenue.		revenue audit of pull tabs are		
			contained in §543.24, Revenue Audit.		
6.8	Variances			6.7	
	The operation must establish, as approved by		543.9(h) <i>Variances</i> . The operation		
	the CNGC, the threshold level at which a		must establish, as approved by the		
	variance must be reviewed to determine the		TGRA, the threshold level at which a		
	cause. Any such review must be documented.		variance must be reviewed to		
			determine the cause. Any such review		
			must be documented.		

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3		<u>.                                      </u>		
7.1	Standards for Gaming Systems.	542.13(a) Standards for gaming machines.	5(b) Standards for gaming machines.				
			5(a) Supervision. Supervision must be provided as needed for gaming machines operations by an agent(s) with authority equal to or greater than those being supervised.	543.8(a) <i>Supervision</i> . Supervision must be provided as needed for bingo operations by an agent(s) with authority equal to or greater than those being supervised.			
А	This standard shall set forth procedural requirements for the procurement, installation, operation maintenance, modifications, and removal and/or retirement of gaming machines and Gaming Systems, including the requirements for interior access and the security of system software.		5(e) Gaming machines and components. Controls must be established and procedures implemented to safeguard the integrity of gaming machines and components during installations, operations, modifications, removal and retirements. Such procedures must include the following:	543.8(g) Technologic aids to the play of bingo. Controls must be established and procedures implemented to safeguard the integrity of technologic aids to the play of bingo during installations, operations, modifications, removal and retirements. Such procedures must include the following:		В	This standard shall set forth procedural requirements for the Controls must be established and procedures implemented to safeguard the integrity of gaming machines/player interfaces and components during procurement, installation, operations, maintenance, modifications, and removal and/or retirement of gaming machines and Gaming Systems, including the requirements for interior access and the security of system software.
В	For this section only, credit or customer credit means a unit of value equivalent to cash or cash equivalent deposited, wagered, won, lost, or redeemed by a customer.	542.13(a)(1) For this section only, credit or customer credit means a unit of value equivalent to cash or cash equivalents deposited, wagered, won, lost, or redeemed by a customer. (2) Coins shall include tokens.	5(b)(1) For this section only, credit or customer credit means a unit of value equivalent to cash or cash equivalents deposited, wagered, won, lost, or redeemed by a customer. (2) Coins shall include tokens			₽	For this section only, credit or customer credit means a- unit of value equivalent to cash or cash equivalent- deposited, wagered, won, lost, or redeemed by a- customer.
С	For all computerized gaming systems, a personnel access listing shall be maintained, which includes at a minimum the following:	542.13(a)(3) For all computerized gaming machine systems, a personnel access listing shall be maintained, which includes at a minimum:	5(b)(3) For all computerized gaming machine systems, an agent access listing shall be maintained, which includes at a minimum:			С	For all computerized gaming systems, a personnel access listing shall be maintained, which includes at a minimum the following:
1	Employee name or employee identification number (or equivalent); and,		5(b)(3)(i) Agent name or agent identification number (or equivalent); and			1	Employee Agent name or employee agent identification number (or equivalent); and,
2	Listing of functions employee can perform or equivalent means of identifying the same.	542.13(a)(3)(ii) Listing of functions employee can perform or equivalent means of identifying same.	5(b)(3)(ii) Listing of functions agents can perform or equivalent means of identifying same.			2	Listing of functions employee agents can perform or equivalent means of identifying the same.
7.2	Certification and Approval.	Survey.	Same				
				543.8(g)(7) TGRA approval of all technologic aids before they are offered for play.			CNGC approval of all technologic aids before they are offered for play.
				543.8(g)(8) All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games; and			All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games; and
А	Any manufacturer, distributor, or supplier of a gaming system(s) for purchase, lease, or any other use or storage at any licensed gaming facility must submit a completed vendor license application and licensure fee to the CNGC and receives a vendor license from the CNGC, prior to the sale, lease and delivery of any gaming system(s)					А	Any manufacturer, distributor, or supplier of a gaming system(s) for purchase, lease, or any other use or storage at any licensed gaming facility must submit a completed vendor license application and licensure fee to the CNGC and receives a vendor license from the CNGC, prior to the sale, lease and delivery of any gaming system(s).

В	Section 7 - Gaming Systems  An Independent test laboratory is a laboratory agreed to and designated in writing by the CNGC as competent and qualified to conduct scientific tests and evaluations on electronic gaming systems, devices, and	542	NIGC Class III Guidance BULLETIN 2018-3	543	Tribal - State Compact	REF	
	to and designated in writing by the CNGC as competent and qualified to conduct scientific tests and				2/17) 117-1		
	related equipment.				3(17) "Independent testing laboratory" means a laboratory of national reputation that is demonstrably competent and qualified to scientifically test and evaluate devices for compliance with this Compact and to otherwise perform the functions assigned to it in this Compact. An independent testing laboratory shall not be owned or controlled by the tribe, the enterprise, an organizational licensee as defined in the State-Tribal Gaming Act, the state, or any manufacturer, supplier or operator of gaming devices. The selection of an independent testing laboratory for any purpose under this Compact shall be made from a list of one or more laboratories mutually agreed upon by the parties; provided that the parties hereby agree that any laboratory upon which the National Indian Gaming Commission has relied for such testing may be utilized for testing required by this Compact;		
C	Per Tribal-State Compact, only a nationally recognized laboratory may be used to conduct and evaluate gaming systems used for certification of compact games.				4(B) A tribe shall not operate an electronic bonanza-style bingo game, an electronic instant bingo game or an electronic amusement game pursuant to this Compact until such game has been certified by an independent testing laboratory and the TCA as meeting the standards set out in the State-Tribal Gaming Act for electronic bonanzastyle bingo games, electronic instant bingo games or electronic amusement games, as applicable or any standards contained in the Oklahoma Horse Racing Commission rules issued pursuant to subsection B of Section 9 the State-Tribal Gaming Act that modify the standards for such games that may be conducted by organizational licensees.  Provided, the tribe may rely on any certification of an electronic bonanza-style bingo game, an electronic instant bingo, or electronic amusement games by the Oklahoma Horse Racing Commission which was obtained by an organization licensee pursuant to the State-Tribal Gaming Act to establish certification compliance under this Compact. The tribe may also rely on any certification of an electronic bonanza-style bingo game, electronic instant bingo or an electronic amusement game by the TCA obtained by another tribe which has entered into the model compact to establish certification compliance under this Compact.		
D	All Class II gaming equipment must comply with 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games;				Compact		
E	All gaming systems and related equipment, including system interfaces used for accounting and player tracking purposes must be approved by the CNGC, which may also require certification by a gaming laboratory.						
7.3	Security of System Software.	542.13(g) EPROM control standards.	5(e)(4) System software signature verification.	543.8(g)(4) System software signature verification.			
А	Procedures must be implemented for system software verifications. These procedures must include comparing signatures generated by the verification programs required by 25 CFR 547.8, to the signatures provided in the independent test laboratory letter for that software version.		5(e)(4)(i) Procedures must be implemented for system software verifications. These procedures must include comparing signatures generated by the verification programs to the signatures provided in the independent test laboragoty letter for that software version.	543.8(g)(4)(i) Procedures must be implemented for system software verifications. These procedures must include comparing signatures generated by the verification programs required by 25 CFR 547.8, to the signatures provided in the independent test laboratory letter for that			

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	An agent independent of the gaming machine		5(e)(4)(ii) An agent independent of the	543.8(g)(4)(ii) An agent independent of the			
	operation must perform system software signature		gaming machine operation must perform	bingo operation must perform system			
В	verification(s) to verify that only approved software is		system software signature verification(s) to	software signature verification(s) to verify that			
	installed.		verify that only approved software is	only approved software is installed.			
	mstanca.		installed	only approved software is instance.			
	Procedures must be implemented for investigating and		5(e)(4)(iii) Procedures must be implemented	543.8(g)(4)(iii) Procedures must be			
	resolving any software verification variances.		for investigating and resolving any software	implemented for investigating and resolving			
С	lessening any serimane remieution runances.		verification variances.	any software verification variances.			
			vermeation variances.	any software verification variances.			
	At least annually, procedures shall be performed to	542.13(g)(1) At least annually, procedures shall	5(e)(5)(i) Game program or other equivalent				
	insure the integrity of a sample of gaming machine	be performed to insure the integrity of a	game sofware media control standards. (i) At				
	game program EPROMs, or other equivalent game	sample of gaming machine game program	least annually, procedures shall be				
	software media, by personnel independent of the	EPROMs, or other equivalent game software	performed to insure the integrity of a sample				
	gaming machine department or the machines being	media, by personnel independent of the	of gaming machine game program or other				
D							
	tested.	gaming machine department or the machines	equivalent game software media, by				
		being tested.	personnel independent of the gaming				
			machine department or the machines being				
			tested.				
	The CNGC, or the gaming operation subject to the	542.13(g)(2) The Tribal gaming regulatory	5(e)(5)(ii) The TGRA, or the gaming				
	approval of the CNGC, shall develop and implement	authority, or the gaming operation subject to	operation subject to the approval of the				
			TGRA, shall develop and implement				
E	procedures for the following:	the approval of the Tribal gaming regulatory	· · ·				
		authority, shall develop and implement	procedures for the following:				
		procedures for the following:					
	Removal of EPROMs, or other equivalent game	542.13(g)(2)(i) Removal of EPROMs, or other	5(e)(5)(ii)(1) Removal of game program or				
		_					
	software media, from devices, the verification of the	equivalent game software media, from devices,	other equivalent game software media, from				
	existence of errors as applicable, and the correction via		devices, the verification of the existence of				
1			errors as applicable, and the correction via				
	other equivalent game software media;	from the master game program EPROM, or	duplication from the master game program				
		other equivalent game software media;	or other equivalent game software media;				
	Capuing and gaming device program to another	E42.12(g)(2)(ii) Conving one gaming device	E(a)(E)(i)(2). Conving one gaming device				
2	Copying one gaming device program to another	542.13(g)(2)(ii) Copying one gaming device	5(e)(5)(ii)(2) Copying one gaming device				
2	approved program;	program to another approved program;	program to another approved program;				
	Verification of duplicated EPROMs before being offered	E42 12(a)(2)iii) Varification of duplicated	E(a)(E)(ii)(2) Varification of dualisated areas				Varification of duplicated EPPOMs, same progress as
		-	5(e)(5)(ii)(3) Verification of duplicated game				Verification of duplicated EPROMs, game program or
3	for play;	EPROMs before being offered for play;	program or other equivalent game software			3	other equivalent game software media before being
			media before being offered for play;				offered for play;
-	Receipt and destruction of EPROMs, or other equivalent	542 13(a)(2(iv) Possint and destruction of	5(e)(5)(ii)(4) Receipt and destruction of				Receipt and destruction of EPROMs, game program or
4							· · · · · · · · · · · · · · · · · · ·
4	game software media; and	EPROMs, or other equivalent game software	game program or other equivalent game			4	other equivalent game software media; and
-	Securing the EPROM, or other equivalent game	media; and 542.13(g)(2)(v) Securing the EPROM, or other	software media; and				Socuring the EDPOM same program or ather
	·		5(e)(5)(ii)(5) Securing game program or				Securing the EPROM, game program or other
_	software media, duplicator, and master game EPROMs,		other equivalent game software media and				equivalent game software media, duplicator, and
5	or other equivalent game software media, from	and master game EPROMs, or other equivalent	I -			5	master game EPROMs <del>, or other equivalent game</del>
	unrestricted access.	game software media, from unrestricted access.					<del>software media,</del> from unrestricted access.
	The second of the	F42 12(a)(2). The consta	F(-)/F)/") The second of				
	The master game program number, par percentage,	542.13(g)(3) The master game program	5(e)(5)(iii) The master game program				
_	and the pay table shall be verified to the par sheet	number, par percentage, and the pay table	number, par percentage, and the pay table				
F	when initially received from the manufacturer.	shall be verified to the par sheet when initially	shall be verified to the par sheet when				
		received from the manufacturer.	initially received from the manufacturer.				

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	Gaming machines with potential jackpots in excess of	542.13(g)(4) Gaming machines with potential	5(e)(5)(iv) Gaming machines shall have the				Gaming machines with potential jackpots in excess of
	\$100,000 shall have the game software circuit boards	jackpots in excess of \$100,000 shall have the	game software circuit boards locked or				\$100,000 shall have the game software circuit boards
	locked or physically sealed. The lock or seal shall	game software circuit boards locked or	physically sealed. The lock or seal shall				locked or physically sealed. The lock or seal shall
	necessitate the presence of a person independent of	physically sealed. The lock or seal shall	necessitate the presence of a person				necessitate the presence of a person independent of
	the gaming machine department to access the device	necessitate the presence of a person	independent of the gaming machine				the gaming machine department to access the device
G	game program EPROM, or other equivalent game	independent of the gaming machine	department to access the device game				game program EPROM, or other equivalent game
G	software media. If a seal is used to secure the board to		program or other equivalent game software				software media. If a seal is used to secure the board to
	the frame of the gaming device, it shall be pre-	program EPROM, or other equivalent game	media. If a seal is used to secure the board				the frame of the gaming device, it shall be pre-
	numbered.	software media. If a seal is used to secure the	to the frame of the gaming device, it shall be				numbered.
	mumbered.	board to the frame of the gaming device, it	pre-numbered.				manberea.
		shall be pre-numbered.	pre numbered.				
		Shail be pre-humbered.					
	Records that document the procedures in paragraph (E)	542.13(g)(5) Records that document the					
Н	(1) of this section shall include the following	procedures in paragraph (g)(2)(i) of this section					
"	information:	shall include the following information:					
1	Date;	542.13(g)(5)(i) Date;					
2	Machine number (source and destination);	542.13(g)(5)(ii) Machine number (source and					
		destination);					
3	Manufacturer;	542.13(g)(5)(iii) Manufacturer;					
4	Program number;	542.13(g)(5)(iv) Program number;					
5	Personnel involved;	542.13(g)(5)(v) Personnel involved;					
6	Reason for duplication;	542.13(g)(5)(vi) Reason for duplication;					
	Disposition of any permanently removed EPROM, or	542.13(g)(5)(vii) Disposition of any permanently					
7	other equivalent game software media;	removed EPROM, or other equivalent game					
		software media;					
8	Seal numbers, if applicable; and	542.13(g)(5)(viii) Seal numbers, if applicable;					
		and					
9	Approved testing lab approval numbers, if available.	542.13(g)(5)(ix) Approved testing lab approval					
	500016	numbers, if available.					
	EPROMS, or other equivalent game software media,	542.13(g)(6) EPROMS, or other equivalent					
	returned to gaming devices shall be labeled with the	game software media, returned to gaming					
	program number. Supporting documentation shall	devices shall be labeled with the program					
	include the date, program number, information	number. Supporting documentation shall					
I	identical to that shown on the manufacturer's label, and						
	initials of the person replacing the EPROM, or other	identical to that shown on the manufacturer's					
	equivalent game software media.	label, and initials of the person replacing the					
		EPROM, or other equivalent game software					
		media.					
7.4	Installation.						
7.7	The CNGC shall establish procedures governing the		5(e) Gaming machines and components. 54	43.8(g) Technologic aids to the play of			
	shipping, receiving, and installation of all hardware and			ingo . Controls must be established and			
	software components. Such procedures shall include:			rocedures implemented to safeguard the			
	software components, such procedures shall include:		j	tegrity of technologic aids to the play of			
Α				ngo during installations, operations,			
, ,							
			modifications, removal and retirements. Such m				
			procedures must include the following:	rocedures must include the following:			
			5(e)(1) Shipping and receiving.	43.8(g)(1)(i) Shipping and receiving.		В	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	A communications procedure between the supplier, the		5(e)(1) Shipping and receiving.	543.8(g)(1)(i) Shipping and receiving. A			
	gaming operation, and the CNGC to properly control			communication procedure must be			
	the shipping and receiving of all software and hardware		(i) A communication procedure must be	established between the supplier, the gaming			
	components. Such procedures shall include:		established between the supplier, the	operation, and the TGRA to properly control			
1				the shipping and receiving of all software and			
1			control the shipping and receiving of all	hardware components. Such procedures must			
			software and hardware components. Such	include:			
			procedures must include:				
			F				
	Notification of pending orders/shipments made by the		5(e)(1)(i)(A) Notification of pending	543.8(g)(1)(i)(A) Notification of pending			
a	gaming operation;		-	shipments must be provided to the TGRA by			
			the gaming operation;	the gaming operation;			
	Certification in accordance with all applicable technical			543.8(g)(1)(i)(B) Certification in accordance			
b	standards;		test lab (if technical standards apply through	with 25 CFR part 547;			
			tribal law or compact);				
 	Notification from the supplier to the CNGC, or the		5(e)(1)(i)(C) Notification from the supplier to	543.8(g)(1)(i)(C) Notification from the supplier			
	gaming operation as approved by the CNGC, of the		the TGRA, or the gaming operation as	to the TGRA, or the gaming operation as			
•	shipping date and expected date of delivery. The			approved by the TGRA, of the shipping date			
С	shipping notification shall include, but is not limited to:		and expected date of delivery. The shipping	and expected date of delivery. The shipping			
			notification must include:	notification must include			
:	Name and address of the supplier;		5(e)(1)(i)(C)(1) Name and address of the	543.8(g)(1)(i)(C)(1) Name and address of the			
ı			supplier;	supplier;			
	Description of the shipment;		5(e)(1)(i)(C)(2) Description of shipment;	543.8(g)(1)(i)(C)(2) Description of shipment;			
!!							
iii	A serial number (as applicable);		5(e)(1)(i)(C)(3) Gaming machine serial	543.8(g)(1)(i)(C)(3) For player interfaces: a			
""			number;	serial number;			
	For software: software version and description of		5(e)(1)(i)(C)(4) For software: software version	543.8(g)(1)(i)(C)(4) For software: software			
iv	software;		and description of software;	version and description of software;			
	Method of shipment; and,		5(e)(1)(i)(C)(5) Method of shipment; and	543.8(g)(1)(i)(C)(5) Method of shipment; and			
V	interior of snipment, and,		S(c)(1)(i)(c)(3) Wethod of shipment, and	3-13.5(g)(1)(1)(1)(2)(3) Wiethod of Shipment, and			
vi	Expected date of delivery.		5(e)(1)(i)(C)(6) Expected date of delivery.	543.8(g)(1)(i)(C)(6) Expected date of delivery.			
			5( )(1)(") B	542.0( )(1)(") P			
	A procedure for the exchange of gaming system		5(e)(1)(ii) Procedures must be implemented	543.8(g)(1)(ii) Procedures must be			
2	components for maintenance and replacement.		for the gaming machine system components				
			for maintenance and replacement.	gaming system components for maintenance			
	The CNCC or designed must receive all gooding a system		E(a)/1)/in) The TGDA exite designs and	and replacement.			
	The CNGC or designee must receive all gaming system		5(e)(1)(iv) The TGRA, or its designee, must	543.8(g)(1)(iv) The TGRA, or its designee,			
	components and game play software packages and		receive all gaming machine system	must receive all Class II gaming system			
3	verify the contents against the shipping notification.		components and game play software	components and game play software			
				packages, and verify the contents against the			
			shipping notification.	shipping notification.			
	Gaming system components must be shipped in a		5(e)(1)(iii) Gaming machine components	543.8(g)(1)(iii) Class II gaming system			
1	secure manner to deter unauthorized access.		must be shipped in a secure manner to deter				
4			unauthorized access.	manner to deter unauthorized access.			
	Upon delivery of any gaming devices to any licensed						
-	facility, no one shall break the seal of any delivery, nor						
5	shall any device be removed from the shipping						
	container without the physical presence and/or						
	authorization of a CNGC agent.		E(-)(2)(2) A	542.0(a)(2)(2) Carrie III			Control of the cold Park I are the cold Park I
	Controls must be established to restrict access to the		5(e)(2)(i) Access credential control methods.	543.8(g)(2)(i) Controls must be established to			Controls must be established to restrict access to the
_	Class II gaming system components, as set forth in		Controls must be established to restrict	restrict access to the Class II gaming system			Class II gaming system components, as set forth in
В	Section 20.		access to gaming machine system	components, as set forth in §543.20,			Section 20 - Information Technology.
			components.	Information and Technology.			

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
			5(e)(3) Recordkeeping and audit processes.	543.8(g)(3) Recordkeeping and audit			
		5404041/57 2	5( ) (2) (2) The state of the s	processes.			
	The gaming operation must maintain the following	542.13(h)(7) Records shall be maintained for	5(e)(3)(i) The gaming operation must	543.8(g)(3)(i) The gaming operation must			The gaming operation must maintain the following
	records, as applicable, related to installed game servers		maintain the following records, as applicable				records, as applicable, related to installed gaming e-
	and player interfaces:	machine was placed into service, the date the	related to installed gaming machine	related to installed game servers and player			servers and player interfaces machine components
С		machine was removed from operation, the date	components.	interfaces:			(including game servers, as applicable):
		the machine was placed back into operation,					
		and any changes in machine numbers and					
		designations.					
1	Facility;						
	Date placed into service;		5(e)(3)(i)(A) Date placed into service;	543.8(g)(3)(i)(A) Date placed into service;			
2	Date placed into service,		Date placed into service,	343.8(g)(3)(i)(A) Date placed little service,			
	Date made available for play;		5(e)(3)(i)(B) Date made available for play;	543.8(g)(3)(i)(B) Date made available for play;			
3	Date made available for play,		S(c)(S)(i)(b) Date made available for play,	545.6(g)(5)(i)(b) Bate made available for play,			
4	The name of the Supplier and/or Vendor;		5(e)(3)(i)(C) Supplier;	543.8(g)(3)(i)(C) Supplier;			
	The gaming facility's and the CNGCs ID # assigned to		5(e)(3)(i)(G) <b>Asset</b> and/or location number;	543.8(g)(3)(i)(G) <b>Asset</b> and/or location			The gaming facility's and the CNGCs Asset
5	each machine;			number;			Identification number, ID # assigned to each machine;
	,			·			
6	Floor location;		5(e)(3)(i)(G) Asset and/or location number;	543.8(g)(3)(i)(G) Asset and/or location			
6				number;			
7	The manufacturer's serial number(s);		5(e)(3)(i)(E) Serial number;	543.8(g)(3)(i)(E) Serial number;			
8	The game(s) available on each machine,		5(e)(3)(i)(F) Game title or similar identifying	543.8(g)(3)(i)(F) Game title;			The game <del>(s)</del> title(s) (or similar identifying information)
0			information;				available on each machine,
9	Software version;		5(e)(3)(i)(D) Software version;	543.8(g)(3)(i)(D) Software version;			
10	Software media seal number(s);		5(e)(3)(i)(H) Seal number; and	543.8(g)(3)(i)(H) Seal number; and			
11	Initial meter readings.		5(e)(3)(i)(I) Initial meter reading.	543.8(g)(3)(i)(I) Initial meter reading.			
7.5	Installation Testing.		5(e)(6) Installation testing.	543.8(g)(5) Installation testing.			
	Only CNGC authorized or approved gaming systems		5(e)(8) TGRA approval of all gaming				
	and modifications may be installed.		machines before they are offered for play;				
Α			and				
	Testing must be completed during the installation		5(e)(6)(i) Testing must be completed during	543.8(g)(5)(i) Testing must be completed			Testing must be completed during the installation
	process to verify that the player interface/gaming		the installation process to verify that the	during the installation process to verify that			process to verify that the player interface/gaming
	machine has been properly installed. This must include		gaming machine component has been	the player interface has been properly			machine component has been properly installed. This
В	testing of the following, as applicable:		properly installed. This must include testing	installed. This must include testing of the		В	must include testing of the following, as applicable:
	testing of the following, as applicable.		of the following, as applicable:	following, as applicable:			must include testing of the following, as applicable.
			or the following, as applicable.	Tollowing, as applicable.			
-1	Communication with the Class II gaming system;		5(e)(6)(i)(A) Communication with the	543.8(g)(5)(i)(A) Communication with the		1	Communication with the Class II gaming system;
1			gaming system;	Class II gaming system;		1	
2	Communication with the accounting system;		5(e)(6)(i)(B) Communication with the	543.8(g)(5)(i)(B) Communication with the			
			accounting system;	accounting system;			
3	Communication with the player tracking system;		5(e)(6)(i)(C) Communication with the player	_			
,			tracking system;	player tracking system;			
4	Currency and vouchers to bill acceptor;		5(e)(6)(i)(D) Currency and vouchers to bill	543.8(g)(5)(i)(D) Currency and vouchers to bill			Currency and vouchers/cash-out tickets to bill acceptor;
<u> </u>			acceptor;	acceptor;		4	
5	Voucher printing;		5(e)(6)(i)(E) Voucher printing;	543.8(g)(5)(i)(E) Voucher printing;		5	Voucher/cash-out ticket printing;
6	Meter incrementation;		5(e)(6)(i)(F) Meter incrementation;	543.8(g)(5)(i)(F) Meter incrementation;		-	-
7	Pay table, for verification;		5(e)(6)(i)(G) Pay table, for verification;	543.8(g)(5)(i)(G) Pay table, for verification;			
	Player interface denomination for welf-retired		E(a)(6)(i)(H) Caming machine described	E42.9(a)(E)(i)(Ll) Player interfere			Diavor interface/gaming machine deservingtion for
8	Player interface denomination, for verification;		5(e)(6)(i)(H) Gaming machine denomination, for verification;	denomination, for verification;		8	Player interface/gaming machine denomination, for verification;
<u> </u>	All buttons, to ensure that all are operational and			543.8(g)(5)(i)(I) All buttons, to ensure that all			vernication,
9	programmed appropriately;						
	ргодганнией арргорнацену,		operational and programmed appropriately;	appropriately;			
	System components, to ensure that they are safely		5(e)(6)(i)(J) System components, to ensure	543.8(g)(5)(i)(J) System components, to			
10	installed at location; and		that they are safely installed at location; and				
10	instance at location, and		and they are safety installed at location, and	location; and			
			t .	rocadon, ana		1	

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3	E42.0(-)\(\text{E}\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{C}\(\text{V}(\text{E})\(\text{V}(\text{E})\(\text{C}\(\text{C}\(			
11	Locks, to ensure that they are secure and functioning.		5(e)(6)(i)(K) Locks, to ensure that they are secure and functioning.	543.8(g)(5)(i)(K) Locks, to ensure that they are secure and functioning.	2		
	Records must be kept of all new installations and/or		secure and functioning.	secure and runctioning.			
	modifications to gaming systems. These records must						
	include, at a minimum:						
С							
C							
	The Land Collection Heritage (Control Control						
	The date of the installation or modification;						
1							
	The nature of the installation or change such as new						
	software, server repair, significant configuration modifications;						
	mounications,						
2							
	Evidence of verification that the installation or the						
	modifications are approved; and						
3							
	The identity of the agent(s) performing the						
	installation/modification.						
4							
•							
	2		5(e)(7) Display of rules and necessary	543.8(g)(6) Display of rules and necessary			
7.6	Display of Pay Table, Rules, and Disclaimers.		disclaimers.	disclaimers.			
	The CNGC or the gaming operation must verify that all		5(e)(7) Display of rules and necessary	543.8(g)(6) The TGRA or the operation must			
	game rules and disclaimers are displayed at all times or made readily available to the player upon request.		disclaimers. The TGRA or the operation must verify that all game rules and	verify that all game rules and disclaimers are displayed at all times or made readily			
Α	made readily available to the player upon request.		disclaimers are displayed at all times or	available to the player upon request, as			
			made readily available to the player upon	required by 25 CFR part 547;			
			request:				_
	Summaries of rules for playing covered games and				5(G) Summaries of rules for playing covered games and		
В	winning prizes shall be visibly displayed at all facilities.  Complete sets of rules shall be available in pamphlet				winning prizes shall be visibly displayed at all facilities.  Complete sets of rules shall be available in pamphlet form in		
	form in the facility.				the facility.		
			5(e)(9) Dispute resolution.	543.8(g)(9) Dispute resolution.			
7.7	Draw.						

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	Controls must be established and procedures						
_	implemented to provide a method of recall of the draw,						
A.	which includes the order and identity of the objects						
	drawn, for dispute resolution purposes.						
	Controls must be established and procedures						
	implemented to ensure that the identity of each object						
_	drawn is accurately recorded and transmitted to the						
В.	participants. The procedures must identify the method						
	used to ensure the identity of each object drawn.						
	asea to ensure the identity of each object drawn.						
		542.13(k) <i>In-house progressive gaming</i>	5(j) In-house progressive gaming machine				
7.8	In-House Progressive Gaming Machine.	machine standards.	standards.				
	A meter that shows the amount of the progressive	542.13(k)(1) <b>A meter that shows</b> the amount	5(j)(1) A meter that shows the amount of				
	jackpot shall be conspicuously displayed at or near the		the progressive jackpot shall be				
Α	machines to which the jackpot applies.	conspicuously displayed at or near the	conspicuously displayed at or near the				
	January 200 approx	machines to which the jackpot applies.	machines to which the jackpot applies.				
	At least once each day, each gaming operation shall	542.13(k)(2) At least once each day, each	5(j)(2) At least once each day, each gaming				At least once each day, each gaming operation shall
	record the amount shown on each progressive jackpot	gaming operation shall record the amount	operation shall record the amount shown on				record the amount shown on each progressive jackpot
	meter at the operation except for those jackpots that	shown on each progressive jackpot meter at	each progressive jackpot meter at the				meter at the operation except for those jackpots that
В	can be paid directly from the machine's hopper.	the gaming operation except for those jackpots	1			В	can be paid directly from the gaming machine's
	The state of the s	that can be paid directly from the machine's	that can be paid directly from the gaming				hopper.
		hopper:	Imachine:				Поррон
	Explanations for meter reading decreases shall be	542.13(k)(3) Explanations for meter reading	5(j)(3) Explanations for meter reading				
	maintained with the progressive meter reading sheets,	decreases shall be maintained with the	decreases shall be maintained with the				
	and where the payment of a jackpot is the explanation	progressive meter reading sheets, and where	progressive meter reading sheets, and where				
_	for a decrease, the gaming operation shall record the	1. 2	the payment of a jackpot is the explanation				
C	jackpot payout number on the sheet or have the		for a decrease, the gaming operation shall				
	number reasonably available.	the jackpot payout number on the sheet or	record the jackpot payout number on the				
	,	have the number reasonably available; and	sheet or have the number reasonably				
		inave the name of reasonably available, and	available: and				
	Each gaming operation shall record the base amount of	542.13(k)(4) Each gaming operation shall	5(j)(4) Each gaming operation shall record				
<b>D</b>	each progressive jackpot the gaming operation offers.	record the base amount of each progressive	the base amount of each progressive jackpot				
D		jackpot the gaming operation offers.	the gaming operation offers.				
	The CNGC shall approve procedures specific to the	542.13(k)(5) The Tribal gaming regulatory	5(j)(5) Controls and procedures specific to				
	transfer of progressive amounts in excess of the base	authority shall approve procedures specific to	the transfer of progressive amounts in				
	amount to other gaming machines. Such procedures	the transfer of progressive amounts in excess	excess of the base amount to other gaming				
	may also include other methods of distribution that	of the base amount to other gaming machines.					
Е	accrue to the benefit of the gaming public via an award		Such procedures may also include other				
	or prize.	methods of distribution that accrue to the	methods of distribution that accrue to the				
		benefit of the gaming public via an award or	benefit of the gaming public via an award or				
		prize.	prize.				
		•					
7.9	Wide-Area Progressive Gaming Machine.	542.13(l) Wide area progressive gaming	5(k) Wide area progressive gaming machine			7.9	Wide-Area Progressive Gaming Machine (WAP).
7.5			standards.			7.5	The same state of the same (TAT).
	A meter that shows the amount of the progressive	1717	5(k)(1) A meter that shows the amount of				
	jackpot shall be conspicuously displayed at or near the	of the progressive jackpot shall be	the progressive jackpot shall be				
Δ	machines to which the jackpot applies.	conspicuously displayed at or near the	conspicuously displayed at or near the				
		machines to which the jackpot applies.	machines to which the jackpot applies.				
						1	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3		Time Compact		
	As applicable to participating gaming operations, the	542.13(l)(2) As applicable to participating	5(k)(2) As applicable to participating gaming				
	WAP gaming machine system shall be adequately	gaming operations, the wide area progressive	operations, the wide area progressive	<b>'</b>			
	restricted to prevent unauthorized access (e.g.,	gaming machine system shall be adequately	gaming machine system shall be adequately				
	changing passwords at least quarterly, restrict access to	19 9 1	restricted to prevent unauthorized access.				
	game software media, and restrict physical access to		restricted to prevent unauthorized access.				
В		changing passwords at least quarterly, restrict					
	computer hardware, etc.).	access to EPROMs or other equivalent game					
		software media, and restrict physical access to					
		computer hardware, etc.).					
	The CNGC shall approve procedures for the WAP	542.13(l)(3) The Tribal gaming regulatory	5(k)(3) The TGRA shall approve procedures				
	system that:	authority shall approve procedures for the	for the wide area progressive system that:				
С	system that:	wide area progressive system that:	lior the wide area progressive system that.				
		wae area progressive system that.					
	Reconcile meters and jackpot payouts;	542.13(l)(3)(i) Reconcile meters and jackpot	5(k)(3)(i) Reconcile meters and jackpot				
1	Jan. P. J. P. J.	payouts;	payouts;				
	Collect/drop gaming machine funds;	542.13(l)(3)(ii) Collect/drop gaming machine	5(k)(3)(ii) Collect/drop gaming machine			1	
2		funds;	funds;				
	Verify jackpot, payment, and billing to gaming	542.13(l)(3)(iii) Verify jackpot, payment, and	5(k)(3)(iii) Verify jackpot, payment, and			1	
3	operations on pro-rata basis;	billing to gaming operations on pro-rata basis;	billing to gaming operations on pro-rata				
-		g to gamming operations on pro-rate busis,	basis;				
4	System maintenance;	542.13(l)(3)(iv) System maintenance;	5(k)(3)(iv) System maintenance;			1	
5	System accuracy; and	542.13(l)(3)(v) System accuracy; and	5(k)(3)(v) System accuracy; and				
6	System security.	542.13(I)(3)(vi) System security.	5(k)(3)(vi) System security.				
	Reports, where applicable, adequately documenting the	, , , , , , , , , , , , , , , , , , , ,	5(k)(4) Reports, where applicable, adequately	/			
	procedures required in paragraph 7.11 (C) of this	adequately documenting the procedures	documenting the procedures required in				
D	section shall be generated and retained.	required in paragraph (I)(3) of this section shall					
	section shall be generated and retained.	be generated and retained. (Revised May 4,	generated and retained.				
		2005)	generated and retained.				
7.10	Retirement and/or Removal of Gaming Machines.	2003)	5(f)(2) Removal, retirement and/or	543.8(h)(2) Removal, retirement and/or			
7.10			destruction.	destruction.			
	The CNGC shall establish procedures governing the		5(f)(2) Removal, retirement and/or	543.8(h)(2) Procedures must be implemented			
	retirement and removal of any or all associated		destruction. Procedures must be	to retire or remove any or all associated			
Α	components of a gaming system from operation.		implemented to retire or remove any or all	components of a Class II gaming system from			
			associated components of a gaming system	operation. Procedures must include the			
			from operation	following:			
В	Such procedures shall include the following:		5(f)(2) Procedures must include the	543.8(h)(2) Procedures must include the			
В			following:	following:			
	For gaming machines/player interfaces and		5(f)(2)(i) For gaming machines and	543.8(h)(2)(i) For player interfaces and			
1	components that accept cash or cash equivalents:		components that accept cash or cash	components that accept cash or cash			
			equivalents:	equivalents:			
a	Coordination with the drop team to perform a final		5(f)(2)(i)(A) Coordinate with the drop team	543.8(h)(2)(i)(A) Coordinate with the drop			
u	drop;		to perform a final drop;	team to perform a final drop;			
	Collection of final accounting information such as		5(f)(2)(i)(B) Collect final accounting	543.8(h)(2)(i)(B) Collect final accounting			
b	meter readings, drop and payouts;		information such as meter readings, drop	information such as meter readings, drop and			
			and payouts;	payouts;			
	Remove and/or secure any or all associated equipment		5(f)(2)(i)(C) Remove and/or secure any or all				
С	such as locks, card reader, or ticket printer from retired		associated equipment such as locks, card	or all associated equipment such as locks,			
	or removed component; and		reader, or ticket printer from the retired or	card reader, or ticket printer from the retired			
			removed component; and	or removed component; and			
d	Document removal, retirement, and/or destruction.		5(f)(2)(i)(D) Document removal, retirement,	543.8(h)(2)(i)(D) Document removal,			
			and/or destruction.	retirement, and/or destruction.			
2	For removal of software components:		5(f)(2)(ii) For removal of software	543.8(h)(2)(ii) For removal of software			
_			components:	components:			
	Purge, destroy storage media, and/or return the		5(f)(2)(ii)(A) Uninstall and/or return the	543.8(h)(2)(ii)(A) Purge and/or return the			Uninstall, purge, destroy storage media, and/or return
а	software to the software license holder/owner; and		software to the license holder; and	software to the license holder; and		а	the software to the software license holder/owner; and
b	Document the removal.		5(f)(2)(ii)(B) Document the removal.	543.8(h)(2)(ii)(B) Document the removal.			
3	For all components:		5(f)(2)(iii) For all components:	543.8(h)(2)(iv) For all components:			

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	Verify that unique identifiers and description of		5(f)(2)(iii)(A) Verify that unique identifiers,	543.8(h)(2)(iv)(A) Verify that unique			
	removed/retired components are recorded as part of		and descriptions of removed/retired	identifiers, and descriptions of			
a	the retirement documentation; and		components are recorded as part of the	removed/retired components are recorded as			
-	and the state of t		retirement documentation; and	part of the retirement documentation; and			
			retirement documentation, and	part of the retirement documentation, and			
	Coordinate with the accounting department to properly		5(f)(2)(iii)(B) Coordinate with the accounting	543.8(h)(2)(iv)(B) Coordinate with the			
	retire the component in system records.		department to properly retire the	accounting department to properly retire the			
b	,		component in the system records.	component in the system records.			
				,			
	For other related equipment such as blowers, cards,			543.8(h)(2)(iii) For other related equipment			For other related equipment such as blowers, cards,
4	interface cards:			such as blowers, cards, interface cards:		4	interface cards:
				, ,			
	Remove and/or secure equipment; and			543.8(h)(2)(iii)(A) Remove and/or secure			Remove and/or secure equipment; and
а				equipment; and		a	
				- quipmony and			
	Document the removal or securing of equipment.			543.8(h)(2)(iii)(B) Document the removal or			Document the removal or securing of equipment.
b				securing of equipment.		b	
				2 - 11 1 - 1			
	Where the CNGC authorizes the gaming operation to		5(f)(2)(v) Where the TGRA authorizes	543.8(h)(2)(v) Where the TGRA authorizes			
	destroy any gaming system component, procedures		destruction of any gaming system	destruction of any Class II gaming system			
	must be developed to destroy such components. Such		components, procedures must be developed				
C	procedures must include the following:		to destroy such components. Such	to destroy such components. Such			
	procedures mast include the following.		procedures must include the following:	procedures must include the following:			
			procedures must include the following.	procedures must include the following.			
	Methods of destruction;		5(f)(2)(v)(A) Methods of destruction;	543.8(h)(2)(v)(A) Methods of destruction;			
1	,						
	Witness or surveillance of destruction;		5(f)(2)(v)(B) Witness or surveillance of	543.8(h)(2)(v)(B) Witness or surveillance of			
2	,		destruction;	destruction:			
_	Documentation of all components destroyed; and		5(f)(2)(v)(C) Documentation of all	543.8(h)(2)(v)(C) Documentation of all			
3			components destroyed; and	components destroyed; and			
	Signatures of the employee(s) destroying the		5(f)(2)(v)(D) Signatures of agent(s)	543.8(h)(2)(v)(D) Signatures of agent(s)			
4	components attesting to destruction.		destroying components attesting to	destroying components attesting to			
-	components attesting to destruction.		destruction.	destruction.			
		542.13(h) Standards for evaluating	5(h) Standards for evaluating theoretical	destruction.			
7.11	Standards for Evaluating Theoretical and Actual	theoretical and actual hold percentages.	and actual hold percentages.			7.11	Standards for Evaluating Theoretical and Actual
	Hold Percentages.	(Revised May 4, 2005)	and detail note percentages.				Hold Percentages.
	Accurate and current theoretical hold worksheets shall		5(h)(1) Accurate and current theoretical hold	1			
	be maintained for each gaming machine or group of	hold worksheets shall be maintained for each	worksheets shall be maintained for each				
Α	identical machines (as applicable).	gaming machine.	gaming machine.				
	deritical machines (as applicable).		garning macrine.				
	For multi-game / multi-denominational gaming	542.13(h)(2) For multi-game/multi-	5(h)(2) For multi-game/multi-				
_		denominational machines, an employee or	denominational machines, an employee or				
В	the gaming machine department shall:	department independent of the gaming	department independent of the gaming				
	and garming machine department shan.	machine department shall:	machine department shall:				
	On a weekly basis, record the coin-in meters;	542.13(h)(2)(i) Weekly, record the total coin-in	5(h)(2)(i) Weekly, record the total coin-in				
1	The state of the s	meter;	meter;				
	On a quarterly basis, record the coin-in meters for each	,	5(h)(2)(ii) Quarterly, record the coin-in				
2	pay table contained in a gaming machine or group of	meters for each paytable contained in the	meters for each paytable contained in the				
-	gaming machines; and,	machine; and	machine; and				
	On an annual basis, adjust the theoretical hold	542.13(h)(2)(iii) On an annual basis, adjust the	5(h)(2)(iii) On an annual basis, adjust the				
	percentage in the gaming machine statistical report to	theoretical hold percentage in the gaming	theoretical hold percentage in the gaming				
3	a weighted average based upon the ratio of coin-in for	, , ,	machine statistical report to a weighted				
3	each game pay table.	average based upon the ratio of coin-in for	average based upon the ratio of coin-in for				
	each gaine pay table.	leach game paytable.	- '				
	For those gaming operations that are unable to	542.13(h)(3) For those gaming operations	each game paytable.  5(h)(3) For those gaming operations that are				
	perform the weighted average calculation as required	that are unable to perform the weighted	unable to perform the weighted average				
	by paragraph B of this section, the following		calculation as required by paragraph (g)(2)				
C		average calculation as required by paragraph					
	procedures shall apply:	(h)(2) of this section, the following procedures	of this section, the following procedures				
		shall apply:	shall apply:				
	<u>l</u>	1	1			<u> </u>	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
	On at least an annual basis, calculate the actual hold	542.13(h)(3)(i) On at least an annual basis,	5(h)(3)(i) On at least an annual basis,				
1	percentage for each gaming machine or group of	calculate the actual hold percentage for each	calculate the actual hold percentage for each				
	gaming machines;	gaming machine;	gaming machine;				
	On at least an annual basis, adjust the theoretical hold	542.13(h)(3)(ii) On at least an annual basis,	5(h)(3)(ii) On at least an annual basis, adjust				
	percentage in the gaming machine statistical report for	adjust the theoretical hold percentage in the	the theoretical hold percentage in the				
2	each gaming machine or group of gaming machines to	gaming machine statistical report for each	gaming machine statistical report for each				
	the previously calculated actual hold percentage; and,	gaming machine to the previously calculated	gaming machine to the previously calculated				
		actual hold percentage; and	actual hold percentage; and				
	The adjusted theoretical hold percentage shall be	542.13(h)(3)(iii) The adjusted theoretical hold	5(h)(3)(iii) The adjusted theoretical hold				
	within the spread between the minimum and maximum		percentage shall be within the spread				
3	theoretical payback percentages.	the minimum and maximum theoretical	between the minimum and maximum				
		payback percentages.	theoretical payback percentages.				
	The adjusted theoretical hold percentage for multi-	542.13(h)(4) The adjusted theoretical hold	5(h)(4) The adjusted theoretical hold				
	, ,	percentage for multi-game/multi-	percentage for multi-game/multi-				
D	may be combined for machines with exactly the same	denominational machines may be combined	denominational machines may be combined				
	game mix throughout the year.	for machines with exactly the same game mix	for machines with exactly the same game				
	game mix an oughout the year.	throughout the year	mix throughout the year.				
	The theoretical hold percentages used in the gaming	542.13(h)(5) The theoretical hold	5(h)(5) The theoretical hold percentages				
	machine analysis reports should be within the	percentages used in the gaming machine	used in the gaming machine analysis reports				
Е	performance standards set by the manufacturer.	analysis reports should be within the	should be within the performance standards				
		performance standards set by the	set by the manufacturer.				
<u></u>		manufacturer.					
	Records shall be maintained which include win, write						
	(sales), and win-to-write hold percentages compared to						
F	theoretical hold percentage for each gaming machine						
	or group of gaming machines (as applicable) as follows:						
1	Each shift or session (as applicable);						
2	Each day;						
3	Month-to-date; and						
4	Year-to-date or fiscal year-to-date.	[A2 12/b]/14) A managed about the	[(h)(14) A manager all all language and all all languages and all all all all all all all all all al				
	A report shall be produced at least monthly showing	543.13(h)(14) A report shall be produced at	5(h)(14) A report shall be produced at least				
	month-to-date, year-to-date (previous twelve (12)	least monthly showing month-to-date, year-to-	monthly showing month-to-date, year-to-				
	months data preferred), and if practicable, life-to-date	date (previous twelve (12) months data	date (previous twelve (12) months data				
G	actual hold percentage computations for individual	preferred), and if practicable, life-to-date actual					
	machines or group of machines and a comparison to	hold percentage computations for individual	actual hold percentage computations for				
	each machine's theoretical hold percentage previously						
	discussed.	theoretical hold percentage previously	each machine's theoretical hold percentage				
		discussed.	previously discussed.				
	Records shall be maintained for each machine or group	542.13(h)(6) Records shall be maintained for	5(h)(6) Records shall be maintained for each				
	of machines indicating the dates and type of changes	each machine indicating the dates and type of	machine indicating the dates and type of				
Н	made and the recalculation of the theoretical hold as a		changes made and the recalculation of				
	result of the changes to the gaming machine.	theoretical hold as a result of the changes.	theoretical hold as a result of the changes.				
	Records shall be maintained for each machine that	542.13(h)(7) <b>Records shall be maintained</b> for					
	indicate the date the machine was placed into service,	each machine that indicate the date the	machine that indicate the date the machine				
	the date the machine was removed from operation, the	·	was placed into service, the date the				
I	· ·	-	-				
	any changes in machine numbers and designations.	the machine was placed back into operation,	date the machine was placed back into				
		and any changes in machine numbers and	operation, and any changes in machine				
		designations.	numbers and designations.				
	All of the gaming machines shall contain functioning	542.13(h)(8) All of the gaming machines shall	5(h)(8) All of the gaming machines shall				
	meters that shall record coin-in or credit-in, or on-line	contain functioning meters that shall record	contain functioning meters that shall record				
ر	gaming machine monitoring system that captures	=	<u> </u>				
-	similar data.	monitoring system that captures similar data.	machine monitoring system that captures				
	James Satu.	and the captures similar data.	similar data.				
	1	1	isirina uata.		1	L	<u> </u>

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3		The state company		
	All gaming machines with bill acceptors shall contain	542.13(h)(9) All gaming machines with bill	5(h)(9) All gaming machines with bill				
	functioning billing meters that record the dollar	acceptors shall contain functioning billing	acceptors shall contain functioning billing				
K	amounts or number of bills accepted by denomination.		meters that record the dollar amounts or				
		number of bills accepted by denomination.	number of bills accepted by denomination.				
	Gaming machine in-meter readings shall be recorded at	542.13(h)(10) Gaming machine in-meter	5(h)(10) Gaming machine in-meter readings				
	least weekly immediately prior to or subsequent to a	readings shall be recorded at least weekly	shall be recorded at least weekly (monthly				
	gaming machine drop. On-line gaming machine	(monthly for Tier A and Tier B gaming	for Tier A and Tier B gaming operations)				
	monitoring systems can satisfy this requirement.	operations) immediately prior to or subsequent	immediately prior to or subsequent to a				
	However, the time between readings may extend	to a gaming machine drop. On-line gaming	gaming machine drop. On-line gaming				
	beyond one week in order for a reading to coincide	machine monitoring systems can satisfy this	machine monitoring systems can satisfy this				
L	with the end of an accounting period only if such	requirement. However, the time between	requirement. However, the time between				
	extension is for no longer than six (6) days.	readings may extend beyond one week in	readings may extend beyond one week in				
		order for a reading to coincide with the end of	order for a reading to coincide with the end				
		an accounting period only if such extension is	of an accounting period only if such				
		for no longer than six (6) days.	extension is for no longer than six (6) days.				
	The employee who records the in-meter reading shall	542.13(h)(11) <b>The employee</b> who records the	5(h)(11) The agent who records the in-meter				The employee agent who records the in-meter reading
1	either be independent of the soft count team or shall	in-meter reading shall either be independent of					shall either be independent of the soft count team or
	be assigned on a rotating basis, unless the in-meter	the hard count team or shall be assigned on a	count team or shall be assigned on a				shall be assigned on a rotating basis, unless the in-
	=	rotating basis, unless the in-meter readings are	=				meter readings are randomly verified quarterly for all
М	machines and bill acceptors by a person other than the		are randomly verified quarterly for all			М	gaming machines and bill acceptors by an person-
	regular in-meter reader.	machines and bill acceptors by a person other	gaming machines and bill acceptors by an				agent other than the regular in-meter reader.
	regular in meter reduct.	than the regular in-meter reader.	agent other than the regular in-meter				agent other than the regular III-flieter reader.
		and the regular in meter reader.	reader.				
			reduct.				
	Upon receipt of the meter reading summary, the	542.13(h)(12) <b>Upon receipt</b> of the meter	5(h)(12) Upon receipt of the meter reading				
	accounting department shall review all meter readings	reading summary, the accounting department	summary, the accounting department shall				
N	for reasonableness using pre-established parameters.	shall review all meter readings for	review all meter readings for reasonableness				
		reasonableness using pre-established	using pre-established parameters.				
		parameters.					
	Prior to final preparation of statistical reports, meter	542.13(h)(13) Prior to final preparation of	5(h)(13) Prior to final preparation of				Prior to final preparation of statistical reports, meter
	readings that do not appear reasonable shall be	statistical reports, meter readings that do not	statistical reports, meter readings that do not				readings that do not appear reasonable shall be
	reviewed with gaming machine department employees		appear reasonable shall be reviewed with				reviewed with gaming machine department employees
	or other appropriate designees, and exceptions	gaming machine department employees or	gaming machine department agents or				agents or other appropriate designees, and exceptions
0	•	other appropriate designees, and exceptions	other appropriate designees, and exceptions			0	documented, so that meters can be repaired or clerical
	errors in the recording of meter readings can be	documented, so that meters can be repaired or	·				errors in the recording of meter readings can be
	corrected.	clerical errors in the recording of meter	or clerical errors in the recording of meter				corrected.
		readings can be corrected.	readings can be corrected.				
	Each change to a gaming machine's theoretical hold	542.13(h)(15) <b>Each change</b> to a gaming	5(h)(15) Each change to a gaming machine's				
	percentage, including progressive percentage	machine's theoretical hold percentage,	theoretical hold percentage, including				
	contributions, shall result in that machine being treated	<u> </u>					
1	as a new machine in the statistical reports (i.e., not	shall result in that machine being treated as a	result in that machine being treated as a new				
	commingling various hold percentages) except for	new machine in the statistical reports (i.e., not	machine in the statistical reports (i.e., not				
1	adjustments made in accordance with paragraph B of	commingling various hold percentages), except					
	this section.	for adjustments made in accordance with	except for adjustments made in accordance				
		paragraph (h)(2) of this section.	with paragraph (h)(2) of this section.				
		3 = - (-)(-) =					
	If promotional payouts or awards are included on the	542.13(h)(16) If promotional payouts or awards					
1	gaming machine statistical reports, it shall be in a	are included on the gaming machine statistical	are included on the gaming machine				
Q	manner that prevents distorting the actual hold	reports, it shall be in a manner that prevents	statistical reports, it shall be in a manner that				
	percentages of the affected machines.	distorting the actual hold percentages of the	prevents distorting the actual hold				
		affected machines.	percentages of the affected machines.				
						1	

R inc	CN TICS Section 7 - Gaming Systems	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
R inc			BULLETIN 2018-3				
R inc	ne statistical reports snall be reviewed by both garning	542.13(h)(17) The statistical reports shall be	5(h)(17) The statistical reports shall be				The statistical reports shall be reviewed by both gaming
R inc		reviewed by both gaming machine department	reviewed by both gaming machine				machine department management and management
r.	ndependent of the gaming machine department on at	, , , , , , , , , , , , , , , , , , , ,	department management and management			_	employees agents independent of the gaming machine
illea		independent of the gaming machine	agents independent of the gaming machine			R	department on at least a monthly basis.
	-	department on at least a monthly basis.	department on at least a monthly basis.				acparament on acrease a monerny sassis.
		asparament en at isast a mentiny sasisi	acparament on at least a monary basis.				
Fo	or those Class III gaming machines that have	543.13(h)(18) For those machines that have	5(h)(18) For those machines that have				For those Class III gaming machines that have
ex	xperienced at least one hundred thousand (100,000)	experienced at least 100,000 wagering	experienced a level of wagering transactions				experienced at least one hundred thousand (100,000)
wa	ragering transactions, large variances (three percent	transactions, large variances (three percent	(as established by the gaming operations				or a level of wagering transactions (as established by
(39	8%) recommended) between theoretical hold and	(3%) recommended) between theoretical hold	and approved by the TGRA), large variances				the gaming operation and approved by the TGRA),
ac	ctual hold shall be investigated and resolved by a	and actual hold shall be investigated and	between theoretical hold and actual hold				large variances (three percent (3%) recommended)
s de	epartment independent of the gaming machine	resolved by a department independent of the	shall be investigated and resolved by a			S	between theoretical hold and actual hold shall be
_	epartment with the findings documented and	gaming machine department with the findings	department independent of the gaming			3	investigated and resolved by a department
							independent of the gaming machine department with
l ·	nanner. This does not include linked network games.	regulatory authority upon request in a timely	variance as established by the gaming				the findings documented and provided to the CNGC
	, and the second	manner.	operations and approved by the TGRA.				upon request in a timely manner. This does not include
							linked network games.
	or Class II gaming machines, the operation must						
	stablish, as approved by the CNGC, the threshold level						
_	t which a variance, including deviations from the						
	nathematical expectations required by 25CFR 574.4,						
	vill be reviewed to determine the cause. Any such						
rev	eview must be documented.						
M:	Naintenance of the on-line gaming machine	542.13(h)(19) Maintenance of the on-line	5(h)(19) Maintenance of the on-line gaming				Maintenance of the on-line gaming machine
		gaming machine monitoring system data files	machine monitoring system data files shall				monitoring system data files shall be performed by a
	- · · · · · · · · · · · · · · · · · · ·	shall be performed by a department	be performed by a department independent				department independent of the gaming machine
		independent of the gaming machine	of the gaming machine department.				department. Alternatively, maintenance may be
		department. Alternatively, maintenance may be					performed by gaming machine supervisory employees-
		performed by gaming machine supervisory	performed by gaming machine supervisory			U	agents if sufficient documentation is generated and it is
		employees if sufficient documentation is	agents if sufficient documentation is				randomly verified on a monthly basis by employees
		generated and it is randomly verified on a	generated and it is randomly verified on a				agents independent of the gaming machine
		monthly basis by employees independent of	monthly basis by agents independent of the				department.
		the gaming machine department.	gaming machine department.				иерантенс.
		the gaming machine department.	garing machine department.				
Up	pdates to the on-line gaming machine monitoring	542.13(h)(20) Updates to the on-line gaming	5(h)(20) Updates to the on-line gaming				
,		machine monitoring system to reflect	machine monitoring system to reflect				
V ga	aming machines shall be made at least weekly prior to						
in-	n-meter readings and the weigh process.	machines shall be made at least weekly prior to					
		in-meter readings and the weigh process.	weekly prior to in-meter readings and the				
			weigh process.				
			5(n) Variance. The operation must establish,				The operation must establish, as approved by the
			as approved by the TGRA, the threshold level				TGRA, the threshold level at which a variance must be
			at which a variance must be reviewed to				reviewed to determine the cause. Any such review must
			determine the cause. Any such review must				be documented.
7.12 Ga	aming System Performance Standards.	542.13(m) Accounting/auditing standards.	be documented.				
	aming machine accounting/auditing procedures shall						Gaming machine accounting/auditing procedures shall
		accounting/auditing procedures shall be					be performed by employees agents who are
		performed by employees who are independent					independent of the transactions being reviewed.
		of the transactions being reviewed.					a april a series a se

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
IXLI	Section 7 - Gaming Systems	342	BULLETIN 2018-3	543	Tibal - State Compact	IXLI	Recommended Revisions
	For on-line gaming machine monitoring systems,	542.13(m)(2) For on-line gaming machine	13(d)(4)(i) For on-line gaming machine				
	procedures shall be performed at least monthly to	monitoring systems, procedures shall be	monitoring systems, procedures shall be				
	verify that the system is transmitting and receiving data	3 ,	performed at least monthly to verify that the				
	from the gaming machines properly and to verify the	system is transmitting and receiving data from	system is transmitting and receiving data				
В	continuing accuracy of coin-in meter readings as	the gaming machines properly and to verify the					
	recorded in the gaming machine statistical report.	continuing accuracy of the coin-in meter	verify the continuing accuracy of the coin-in				
	recorded in the gaming machine statistical report.	readings as recorded in the gaming machine	meter readings as recorded in the gaming				
		statistical report.	machine statistical report.				
		statistical report.	inacime statistical report.				
	For weigh scale and currency interface systems, for at	542.13(m)(3) For weigh scale and currency	13(d)(4)(ii) For weigh scale and currency				For weigh scale and currency interface systems, for at
	least one drop period per month accounting/auditing	<b>interface</b> systems, for at least one drop period	interface systems, for at least one drop				least one drop period per month accounting/auditing
	employees shall make such comparisons as necessary	per month accounting/auditing employees	period per month accounting/auditing				employees agents shall make such comparisons as
	to the system generated count as recorded in the	shall make such comparisons as necessary to	employees shall make such comparisons as				necessary to the system generated count as recorded
_	gaming machine statistical report. Discrepancies shall	the system generated count as recorded in the	necessary to the system generated count as				in the gaming machine statistical report. Discrepancies
	be resolved prior to generation/distribution of gaming	gaming machine statistical report.	recorded in the gaming machine statistical			1	shall be resolved prior to generation/distribution of
	machine reports.	Discrepancies shall be resolved prior to	report. Discrepancies shall be resolved prior			1	gaming machine reports.
		generation/distribution of gaming machine	to generation/distribution of gaming			1	
		reports.	machine reports.				
	For each drop period, accounting/auditing personnel	542.13(m)(4) For each drop period,	13(d)(4)(iii) For each drop period,				
	shall compare the coin-to-drop meter reading to the	accounting/auditing personnel shall compare	accounting/auditing personnel shall				
	actual drop amount. Discrepancies should be resolved	the coin-to-drop meter reading to the actual	compare the coin-to-drop meter reading to				
	prior to generation/distribution of on-line gaming	drop amount. Discrepancies should be resolved	·				
D	machine monitoring system statistical reports.	prior to generation/distribution of on-line	should be resolved prior to				
		gaming machine monitoring system statistical	generation/distribution of on-line gaming				
		reports.	machine monitoring system statistical				
			reports.				
	Follow-up shall be performed for any one machine	542.13(m)(5) Follow-up shall be performed for					
	having an unresolved variance between actual coin	any one machine having an unresolved					
	drop and coin-to-drop meter reading in excess of three	variance between actual coin drop and coin-to-					
	percent (3%) and over \$25.00. The follow-up	drop meter reading in excess of three percent					
	performed and results of the investigation shall be	(3%) and over \$25.00. The follow-up performed					
	documented, maintained for inspection, and provided	and results of the investigation shall be					
_	to CNGC upon request.	documented, maintained for inspection, and					
E		provided to the Tribal gaming regulatory					
		authority upon request.					
						1	
						1	
						1	
						1	
	For each drop period, accounting/auditing employees	542.13(m)(6) For each drop period,	13(d)(4)(iv) For each drop period,				For each drop period, accounting/auditing employees
	shall compare the bill-in meter reading to the total bill	accounting/auditing employees shall compare	accounting/auditing employees shall			1	agents shall compare the bill-in meter reading to the
	acceptor drop amount for the period. Discrepancies	the bill-in meter reading to the total bill	compare the bill-in meter reading to the			1	total bill acceptor drop amount for the period.
F	shall be resolved before the generation/distribution of		total bill acceptor drop amount for the				Discrepancies shall be resolved before the
-	gaming machine statistical reports.	Discrepancies shall be resolved before the	period. Discrepancies shall be resolved				generation/distribution of gaming machine statistical
		generation/distribution of gaming machine	before the generation/distribution of			1	reports.
		statistical reports.	gaming machine statistical reports.			1	'
		·	<u> </u>				

REF	CN TICS	542	NIGC Class III Guidance 543	Tribal - State Compact	REF Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3		
	Follow-up shall be performed for any one machine	542.13(m)(7) <b>Follow-up</b> shall be performed for			
	having an unresolved variance between actual currency	•			
	drop and bill-in meter reading in excess of an amount	variance between actual currency drop and bill-			
	that is both more than \$25 and at least three percent	in meter reading in excess of an amount that is			
	(3%) of the actual currency drop. The follow-up	both more than \$25 and at least three percent			
	performed and results of the investigation shall be	(3%) of the actual currency drop. The follow-up			
	documented, maintained for inspection, and provided	performed and results of the investigation shall			
	to the CNGC upon request.	be documented, maintained for inspection, and			
G	to the civae apon request.	provided to the Tribal gaming regulatory			
		authority upon request.			
		dutionty apon request.			
	At least annually, accounting / auditing personnel shall	-	13(d)(4)(viii) At least annually,		At least annually, accounting / auditing personnel
	randomly verify that game software media changes are		accounting/auditing agents shall randomly		agents shall randomly verify that game software media
н	properly reflected in the gaming machine analysis	verify that EPROM or other equivalent game	verify that equivalent game software media		changes are properly reflected in the gaming machine
	report.	software media changes are properly reflected	changes are properly reflected in the gaming		analysis report.
		in the gaming machine analysis reports.	machine analysis reports.		
			13(d)(4)(v) At least monthly, review		At least monthly, review statistical reports for any
			statistical reports for any deviations from the		deviations from the mathematical expectations
			mathematical expectations exceeding a		exceeding a threshold estalished by the CNGC.
			threshold estalished by the TGRA.		
			124 N/A/ N. A.I		
			13(d)(4)(vi) At least monthly, take a random		At least monthly, take a random sample, foot the
			sample, foot the vouchers redeemed and		vouchers redeemed and trace the totals to the totals
			trace the totals to the totals recorded in the		recorded in the voucher system and to the amount
			voucher system and to the amount recorded		recorded in the applicable cashier's accountability
			in the applicable cashier's accountability		document.
			document.		
			13(d)(5)(iii) At least quarterly, unannounced		At least quarterly, unannounced weigh scale and weigh
			weigh scale and weigh scale interface (if		scale interface (if applicable) tests must be performed,
			applicable) tests must be performed, and the		and the test results documented and maintained. This
			test results documented and maintained.  This test may be performed by interal audit		test may be perfomred by interal audit or the CNGC.  The result of these tests must be documented and
			This test may be perfomred by interal audit or the TGRA. The result of these tests must		signed by the agent(s) performing the test.
			be documented and signed by the agent(s)		signed by the agent(s) performing the test.
			performing the test.		
			perioning the test.		
	Accounting/auditing employees shall review exception	542.13(m)(9) Accounting/auditing	13(d)(4)(viii) Review exception reports for all		Accounting/auditing employees agents shall review
			computerized gaming machine systems on a		exception reports for all computerized gaming machine
I	on a daily basis for propriety of transactions and	all computerized gaming machine systems on a			systems on a daily basis for propriety of transactions
	unusual occurrences.	daily basis for propriety of transactions and	unusual occurrences.		and unusual occurrences.
		unusual occurrences.			
	All gaming machine auditing procedures and any	542.13(m)(10) All gaming machine auditing			
	follow-up performed shall be documented, maintained	procedures and any follow-up performed shall			
,	for inspection, and provided to CNGC upon request.	be documented, maintained for inspection, and			
,		provided to the Tribal gaming regulatory			
		authority upon request.			
		·			
			5(n) Variance. The operation must establish,		The operation must establish, as approved by the
			as approved by the TGRA, the threshold level		CNGC, the threshold level at which a variance must be
			at which a variance must be reviewed to		reviewed to determine the cause. Any such review must
			determine the cause. Any such review must		be documented.
1			be documented.		

Section   Control Section   Sectio	REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
Committee Content Co	IXE!		342		343	mbai - State Compact	IXLI	Recommended Revisions
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Control of direction and its grant color of protection of the control of the co	Α	I						
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A manufacture for the control processor and control and address concerns generated and control and address concerns generated and control and address	1							
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A Record scriptor and any controlled process of the control of t	2	Physical and logical protection of storage media and its						
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A contract and the implementation is investigated.  A procedurate must be informerated in investigated by investigate or the following in the contract and address and a	714			E(f) Operations (1) Malfunctions	EA2 9(b) Operations (1) Malformations			
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Access credential control methods and other relevant E controls must adhere to Section 20 – Information and Technology will apply.  Technology.  Standards for revenue Audit of gaming systems are F contained within Section 21 Auditing Revenue.  5(I) All relevant controls from §11, Information and Technology will apply.  5(m) Revenue Audit. Standards for revenue audit of gaming machines are contained in		Tracking shall apply.						
Technology.  Standards for revenue Audit of gaming systems are contained within Section 21 Auditing Revenue.  Standards for revenue Audit of gaming systems are audit of gaming machines are contained in				5(I) All relevant controls from §11,				
Standards for revenue Audit of gaming systems are contained within Section 21 Auditing Revenue.  5(m) Revenue Audit. Standards for revenue audit of gaming machines are contained in	E	controls must adhere to Section 20 – Information and		Information and Technology will apply.				
F contained within Section 21 Auditing Revenue. audit of gaming machines are contained in		Technology.						
§13, Revenue Audit.	F	contained within Section 21 Auditing Revenue.						
				§13, Revenue Audit.				

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 7 - Gaming Systems		BULLETIN 2018-3				
			5(e)(3)(ii) Procedures must be implemented	543.8(g)(3)(ii) Procedures must be			
			for auditing such records in accordance with	implemented for auditing such records in			
			§14, Audit and Accounting.	accordance with §543.23, Audit and			
				Accounting. Such audits must be			
			5(e)(4)(iv) Internal audits must be conducted	documented.			
			as set forth in §14, Audit and Accounting.				
			Such audits must be documented.				

REF		542	NIGC Class III Guidance	543	Recommended Revisions
	Section 8 - Table Games		BULLETIN 2018-3		
8.1	General Table Games Standards.				
А	Supervision. Pit supervisory personnel (with authority equal to or greater than those being supervised) shall provide supervision of all table games. Supervision must be provided as needed during the table game operations by an agent(s) with authority equal to or greater than those being supervised.	1	4(a) Supervision. Supervision must be provided as needed for table games operations by an agent(s) with authority equal to or greater than those being supervised.		Supervision. Pit supervisory personnel (with authority equal to or greater than those being supervised) shall provide supervision of all table games. Supervision must be provided as needed during the table game operations by an agent(s) with authority equal to orgreater than those being supervised.
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 table games department; or			543.10(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 games department; or	A supervisor may function as a dealer without any other supervision if disputes are resolved by supervisory personnel agents independent of the transaction or independent of the table games department; or
2	A dealer may function as a supervisor if not dealing the			543.10(a)(2) A dealer may function as a supervisor if	
	game.	542.9(c)(5) A rake collected or ante placed shall be done in accordance with the posted rules.	4(o) Variance. The operation must establish, as	not dealing the game.  B	An ante placed and collected shall be done in accordance with the posted rules.  The operation must establish, as approved by the
			approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.	С	CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.
8.2	Fill and Credit Standards.	542.12(c) Fill and Credit Standards .	4(b) Fill and credit standards.		
А	Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical series is not repeated during the business year.	one series at a time. The alphabet need not be used if the numerical series is not repeated during the	triplicate form, and in a continuous, pre numbered series. Such slips must be concurrently numbered in a form utilizing the alphabet and only in one series at a time. The alphabet need not be used if the numerical		
В	Unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the cashier or pit departments shall have no access to the secured (control) copies of the fill/credit slips.	be safeguarded and adequate procedures shall be employed in their distribution, use, and control. Personnel from the cashier or pit departments shall	safeguarded and adequate procedures must be employed in their distribution, use, and control. Agents		Unissued and issued fill/credit slips shall be safeguarded and adequate procedures shall be employed in their distribution, use, and control.  Personnel Agents from the cashier or pit departments shall have no access to the secured (control) copies of the fill/credit slips
С	When a Fill/Credit slip is voided, the cashier shall clearly mark "void" across the face of the original and first copy, the cashier and one other person independent of the transactions shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.	542.12(c)(3) When a fill/credit slip is voided, the cashier shall clearly mark "void" across the face of the original and first copy, the cashier and one other person independent of the transactions shall sign both the original and first copy, and shall submit them to the accounting department for retention and	must clearly mark "void" across the face of the original and first copy, the cashier and one other agent independent of the transactions must sign both the original and first copy, and must submit them to the		When a Fill/Credit slip is voided, the cashier agent shall clearly mark "void" across the face of the original and first copy, the cashier and one other personindependent of the transactions shall sign both the original and first copy, and shall submit them to the accounting/revenue audit department for retention and accountability.
D	Fill Transactions shall be authorized by pit supervisory personnel before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where the fill slip is prepared.	542.12(c)(4) Fill transactions shall be authorized by pit supervisory personnel before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where	4(b)(4) Fill transactions must be authorized by pit supervisory agents before the issuance of fill slips and		Fill Transactions shall be authorized by pit supervisory personnel agents before the issuance of fill slips and transfer of chips, tokens, or cash equivalents. The fill request shall be communicated to the cage where the fill slip is prepared.
Е	At least three parts of each Fill slip shall be utilized as follows:	542.12(c)(5) At least three parts of each fill slip shall be utilized as follows:	4(b)(5) At least three parts of each fill slip must be utilized as follows:		

REF		542	NIGC Class III Guidance	543	Recommended Revisions
	Section 8 - Table Games		BULLETIN 2018-3		
	One part shall be transported to the pit with the fill and,	542.12(c)(5)(i) One part shall be transported to the pit	4(b)(5)(i) One part must be transported to the pit with		One part shall be transported to the pit with the fill and,
1	after the appropriate signatures are obtained, deposited	with the fill and, after the appropriate signatures are	the fill and, after the appropriate signatures are		after the appropriate signatures are obtained, deposited
1	in the table game drop box,		obtained, deposited in the table game drop box;		in the CISC table game drop box,
2	One part shall be retained in the cage for reconciliation	542.12(c)(5)(ii) One part shall be retained in the cage	4(b)(5)(ii) One part must be retained in the cage for		
2	of the cashier bank, and	for reconciliation of the cashier bank; and	reconciliation of the cashier bank; and		
	For computer systems, one part shall be retained in a	542.12(c)(5)(iii) For computer systems, one part shall	4(b)(5)(iii) For computer systems, one part must be		For computer systems, one part shall be retained in a
	secure manner to ensure that only authorized persons	be retained in a secure manner to insure that only	retained in a secure manner to insure that only		secure manner to ensure that only authorized persons
_	may gain access to it. For manual systems, one part shall	_	authorized agents may gain access to it. For manual		agents may gain access to it. For manual systems, one
3	be retained in a secure manner in a continuous	systems, one part shall be retained in a secure	systems, one part must be retained in a secure		part shall be retained in a secure manner in a
	unbroken form.	manner in a continuous unbroken form.	manner in a continuous unbroken form.		continuous unbroken form.
	unbroken form.	Infamilier in a continuous unbroken form.	infamer in a continuous unbroken form.		continuous unbroken form.
	For Tier C gaming operations, the part of the Fill slip	542.12(c)(6) For Tier C gaming operations, the part of			For Tier C gaming operations, the part of the Fill slip
	that is placed in the table game drop box shall be of a	the fill slip that is placed in the table game drop box			that is placed in the table game drop box CISC shall be
	different color for fills than for credits, unless the type of				of a different color for fills than for credits, unless the
F	transaction is clearly distinguishable in another manner				type of transaction is clearly distinguishable in another
·					
	(the checking of a box on the form shall not be a clearly				manner (the checking of a box on the form shall not be
	distinguishable indicator).	box on the form shall not be a clearly distinguishable			a clearly distinguishable indicator).
	The table number, shift, and amount of fill by	indicator) 542.12(c)(7) The table number, shift, and amount of	4(b)(6) The table number, shift, and amount of fill by		
			· 1		
_	denomination and in total shall be noted on all copies	fill by denomination and in total shall be noted on all	denomination and in total must be noted on all copies		
G	of the fill slip. The correct date and time shall be	copies of the fill slip. The correct date and time shall	of the fill slip. The correct date and time must be		
	indicated on at least two copies.	be indicated on at least two copies.	indicated on at least two copies.		
	All City of all has a social forms the same binds as a section	[42 12(2)(0) All file shall be assisted from the continue	A/L-V/7> All fills ground by a serviced from the conditions		All Cile shall be associated as a shipping and because
	All fills shall be carried from the cashier's cage by a	542.12(c)(8) All fills shall be carried from the cashier's	4(b)(7) All fills must be carried from the cashier's cage		All fills shall be carried from the cashier's cage by an
H	person who is independent of the cage or pit.	cage by a person who is independent of the cage or	by an agent who is independent of the cage or pit.		person agent who is independent of the cage or pit.
		pit.			
	The fill slip shall be signed by at least the following		4(b)(8) The fill slip must be signed by at least the		The fill slip shall be signed by at least the following
I	persons (as an indication that each has counted the	9.	following agents (as an indication that each has		persons agents (as an indication that each has counted
_	amount of the fill and the amount agrees with the fill	counted the amount of the fill and the amount agrees	counted the amount of the fill and the amount agrees		the amount of the fill and the amount agrees with the
	slip):	with the fill slip):	with the fill slip):		fill slip):
1	Cashier who prepared the fill slip and issued the chips,	542.12(c)(9)(i) Cashier who prepared the fill slip and	4(b)(8)(i) Cashier who prepared the fill slip and issued		
_	tokens, or cash equivalent;	issued the chips, tokens, or cash equivalent;	the chips, tokens, or cash equivalent;		
	Runner who carried the chips, tokens, or cash	542.12(c)(9)(ii) Runner who carried the chips, tokens,	4(b)(8)(ii) Runner who carried the chips, tokens, or cash		
2	equivalents from the cage to the pit;	or cash equivalents from the cage to the pit;	equivalents from the cage to the pit;		
	Dealer or boxperson who received the chips, tokens, or		4(b)(8)(iii) Dealer who received the chips, tokens, or cash		
3	cash equivalents at the gaming table; and;	chips, tokens, or cash equivalents at the gaming table;	equivalents at the gaming table; and		
		and			
4	Pit supervisory personnel who supervised the fill	542.12(c)(9)(iv) Pit supervisory personnel who	4(b)(8)(iv) Pit supervisory agent who supervised the fill		Pit supervisory personnel agent who supervised the fill
7	transaction; and,	supervised the fill transaction.	transaction.		transaction; and,
	Fills shall be broken down and verified by the dealer or	542.12(c)(10) Fills shall be broken down and verified	4(b)(9) Fills must be broken down and verified by the		
	boxperson in public view before the dealer or	by the dealer or boxperson in public view before the	dealer in public view before the dealer places the fill in		
,	boxperson places the fill in the table tray.	dealer or boxperson places the fill in the table tray.	the table tray.		
	·				
	A copy of the Fill slip shall then be deposited into the	542.12(c)(11) A copy of the fill slip shall then be	4(b)(10) A copy of the fill slip must then be deposited		A copy of the Fill slip shall then be deposited into the
I/	table game drop box by the dealer, where it shall		into the drop box on the table by the dealer, where it		table game drop box CISC by the dealer, where it shall
K	appear in the soft count room with the cash receipts for	· · · · · · · · · · · · · · · · · · ·	must appear in the soft count room with the cash		appear in the soft count room with the cash receipts for
	the shift.	with the cash receipts for the shift.	receipts for the shift.		the shift.
-	•	, and property of the economic		<u> </u>	

REF		542	NIGC Class III Guidance	543	Recommended Revisions
	Section 8 - Table Games		BULLETIN 2018-3		
	Table credit transactions shall be authorized by a pit	542.12(c)(12) Table credit transactions shall be	4(b)(11) Table credit transactions must be authorized		
	supervisor before the issuance of credit slips and	authorized by a pit supervisor before the issuance of	by a pit supervisor before the issuance of credit slips		
1	transfer of chips, tokens, or other cash equivalent. The	credit slips and transfer of chips, tokens, or other cash	and transfer of chips, tokens, or other cash equivalent.		
_	credit request shall be communicated to the cage where	equivalent. The credit request shall be communicated	The credit request must be communicated to the cage		
	the credit slip is prepared.	to the cage where the credit slip is prepared.	where the credit slip is prepared.		
М	At least three parts of each Credit slip shall be utilized	542.12(c)(13) At least three parts of each credit slip	4(b)(12) At least three parts of each credit slip must be		
	as follows:		utilized as follows:		
	Two parts of the credit slip shall be transported by the	542.12(c)(13)(i) Two parts of the credit slip shall be	4(b)(12)(i) Two parts of the credit slip must be		Two parts of the credit slip shall be transported by the
	runner to the pit. After signatures of the runner, dealer,	transported by the runner to the pit. After signatures	transported by the runner to the pit. After signatures		runner to the pit. After signatures of the runner, dealer,
	and pit supervisor are obtained, one copy shall be	of the runner, dealer, and pit supervisor are obtained,	of the runner, dealer, and pit supervisor are obtained,		and pit supervisor are obtained, one copy shall be
	deposited in the table game drop box and the original	one copy shall be deposited in the table game drop	one copy must be deposited in the table game drop box		deposited in the table game drop box CISC and the
1	shall accompany transport of the chips, tokens, markers,	box and the original shall accompany transport of the	and the original must accompany transport of the chips,		original shall accompany transport of the chips, tokens,
	or cash equivalents from the pit to the cage for	chips, tokens, markers, or cash equivalents from the	tokens, markers, or cash equivalents from the pit to the		markers, or cash equivalents from the pit to the cage for
	verification and signature of the cashier.	pit to the cage for verification and signature of the	cage for verification and signature of the cashier.		verification and signature of the cashier.
		cashier.	3		j
	For computer systems, one part shall be retained in a	542.12(c)(13)(ii) For computer systems, one part shall	4(b)(12)(ii) For computer systems, one part must be		For computer systems, one part shall be retained in a
	secure manner to ensure that only authorized persons	be retained in a secure manner to insure that only	retained in a secure manner to insure that only		secure manner to ensure that only authorized persons
2	may gain access to it. For manual systems, one part shall	authorized persons may gain access to it. For manual	authorized agents may gain access to it. For manual		agents may gain access to it. For manual systems, one
2	be retained in a secure manner in a continuous	systems, one part shall be retained in a secure	systems, one part must be retained in a secure manner		part shall be retained in a secure manner in a
	unbroken form.	manner in a continuous unbroken form.	in a continuous unbroken form.		continuous unbroken form.
	The table number, shift, and the amount of credit by	542.12(c)(14) The table number, shift, and the amount	4(b)(13) The table number, shift, and the amount of		
	denomination and in total shall be noted on all copies	of credit by denomination and in total shall be noted	credit by denomination and in total must be noted on		
N	of the credit slip. The correct date and time shall be	on all copies of the credit slip. The correct date and	all copies of the credit slip. The correct date and time		
	indicated on at least two copies.	time shall be indicated on at least two copies.	must be indicated on at least two copies.		
	Chips, tokens, and/or cash equivalents shall be removed		4(b)(14) Chips, tokens, and/or cash equivalents must be		
	from the table tray by the dealer or boxperson and shall		removed from the table tray by the dealer and must be		
0	be broken down and verified by the dealer or	boxperson and shall be broken down and verified by	broken down and verified by the dealer in public view		
Ü	boxperson in public view prior to placing them in racks	the dealer or boxperson in public view prior to	prior to placing them in racks for transfer to the cage.		
	for transfer to the cage.	placing them in racks for transfer to the cage.			
	All chips, tokens, and cash equivalents removed from	542.12(c)(16) All chips, tokens, and cash equivalents	4(b)(15) All chips, tokens, and cash equivalents		All chips, tokens, and cash equivalents removed from
	the tables and markers removed from the pit shall be	removed from the tables and markers removed from	removed from the tables and markers removed from		the tables and markers removed from the pit shall be
Р	carried to the cashier's cage by a person who is	the pit shall be carried to the cashier's cage by a	the pit must be carried to the cashier's cage by an agent		carried to the cashier's cage by an agent person who is
	independent of the cage or pit.	person who is independent of the cage or pit.	who is independent of the cage or pit.		independent of the cage or pit.
	The credit slip shall be signed by at least the following	542.12(c)(17) The credit slip shall be signed by at least			The credit slip shall be signed by at least the following
0	persons (as an indication that each has counted or, in	the following persons (as an indication that each has	• •		agents persons (as an indication that each has counted
•	the case of markers, reviewed the items transferred)	counted or, in the case of markers, reviewed the items	counted or, in the case of markers, reviewed the items		or, in the case of markers, reviewed the items
		transferred):	transferred):		transferred)
_	Cashier who received the items transferred from the pit		4(b)(16)(i) Cashier who received the items transferred		
1	and prepared the Credit slip;	transferred from the pit and prepared the credit slip;	from the pit and prepared the credit slip;		
		542 42( )/47)(') B	4(1)(1(C)(2) B		
2	Runner who carried the items transferred from the pit to		4(b)(16)(ii) Runner who carried the items transferred		
	the cage;		from the pit to the cage;		
3	Dealer who had custody of the items prior to transfer to	-	4(b)(16)(iii) Dealer who had custody of the items prior		
	the cage;		to transfer to the cage; and		
4	Pit supervisory personnel who supervised the credit		4(b)(16)(iv) Pit supervisory agent who supervised the		Pit supervisory personnel agent who supervised the
	transaction; and,		credit transaction.		credit transaction; and,
5		•	4(b)(17) The credit slip must be inserted in the drop box		The Credit slip shall be inserted in the table game drop
	box by the dealer.	drop box by the dealer.	by the dealer.		box CISC by the dealer.

REF		542	NIGC Class III Guidance	543	Recommended Revisions
1121	Section 8 - Table Games		BULLETIN 2018-3	3.3	Recommended Revisions
		542.12(c)(19) Chips, tokens, or other cash equivalents	4(b)(18) Chips, tokens, or other cash equivalents must		
	·	·	be deposited on or removed from gaming tables only		
R	·	only when accompanied by the appropriate fill/credit			
		or marker transfer forms.	marker transfer forms.		
	marker transfer forms.	of marker transfer forms.	indiker transfer forms.		
	Cross fills (the transfer of chips between table games)	542.12(c)(20) Cross fills (the transfer of chips between	4(b)(19) Cross fills (the transfer of chips between table		
S		•	games) and even cash exchanges are prohibited in the		
		in the pit.	nit		
3.3		•	4(c) Table inventory forms.		
	, and the second		4(c)(1) At the close of each shift, for those table banks		
4			that were opened during that shift:		
	j	, ,	4(c)(1)(i) The table's chip, token, coin, and marker		
1		marker inventory shall be counted and recorded on a	·		
		•	inventory form; or		
	If the table banks are maintained on an imprest basis, a		4(c)(1)(ii) If the table banks are maintained on an		
	•		imprest basis, a final fill or credit must be made to bring		
2		·	the bank back to par.		
	to par.	bring the bank back to par.	the bank back to par.		
	If final fills are not made, beginning and ending	542.12(d)(2) If final fills are not made, beginning and	4(c)(2) If final fills are not made, beginning and ending		
	inventories shall be recorded on the master game sheet	3 3	inventories must be recorded on the master game		
3		-	_		
	for shift win calculation purposes.	game sheet for shift win calculation purposes.	sheet for shift win calculation purposes.		
	The accuracy of inventory forms prepared at shift end	542.12(d)(3) The accuracy of inventory forms	4(c)(3) The accuracy of inventory forms prepared at		
		prepared at shift end shall be verified by the outgoing			
			supervisor and the dealer. Alternatively, if the dealer is		
2			not available, such verification may be provided by		
		provided by another pit supervisor or another	another pit supervisor or another supervisor from		
	Verifications shall be evidenced by signature on the		another gaming department. Verifications must be		
	inventory form.	Verifications shall be evidenced by signature on the	evidenced by signature on the inventory form.		
	If inventory forms are placed in the drop box, such	inventory form. 542.12(d)(4) If inventory forms are placed in the drop	4(c)(4) If inventory forms are placed in the drop box.		If inventory forms are placed in the CISC drop box, such
D		•	such action must be performed by an agent other than		action shall be performed by an person agent other
		than a pit supervisor.	a pit supervisor.		than a pit supervisor.
	supervisor.  Table Game Computer Generated Documentation		4(d) Table games computer generated documentation		triair a pit supervisor.
.4	-	·	standards.		
		· · · · · · · · · · · · · · · · · · ·	4(d)(1) The computer system must be capable of		
^	adequate documentation of all information recorded on	<i>-</i>	generating adequate documentation of all information		
A			recorded on the source documents and transaction		
	fill/credit slips, markers, etc.).	transaction detail (e.g., fill/credit slips, markers, etc.).	detail (e.g., fill/credit slips, markers, etc.).		
	This documentation shall be restricted to authorized	542.12(e)(2) This documentation shall be restricted to	4(d)(2). This documentation must be restricted to		This documentation shall be restricted to authorized
В			authorized agents.		personnel agents.
	The documentation shall include, at a minimum:		(d)(3) The documentation must include, at a minimum:		регочные аусись.
	•	· · · · · · · · · · · · · · · · · · ·			
1	, , , , , , , , , , , , , , , , , , , ,		4(d)(3)(i) System exception information (e.g.,		
T		• • • •	appropriate system parameter information, corrections,		
			voids, etc.); and		Demograph Assert assess P. C. H. L.
2	_		4(d)(3)(ii) Agent access listing, which includes, at a		Personnel Agent access listing, which includes, at a
		,	minimum:		minimum:
а	, ,	542.12(e)(3)(ii)(A) Employee name or employee	4(d)(3)(ii)(A) Agent name or agent identification		Employee Agent name or employee agent identification
			number (if applicable); and		number (if applicable); and
			4(d)(3)(ii)(B) Listing of functions agents can perform or		Listing of functions employees agents can perform or
b	equivalent means of identifying the same.	perform or equivalent means of identifying the same.	equivalent means of identifying the same.		equivalent means of identifying the same.

REF		542	NIGC Class III Guidance	543	Recommended Revisions
	Section 8 - Table Games		BULLETIN 2018-3		
8.5	Standards for Playing Instruments.	542.12(f) Standards for playing cards and dice.	4(e) Standards for playing cards and dice.		
А	The following standards shall apply to playing cards and				
	dice:  Both used and unused playing cards and dice shall be	542.12(f)(1) Playing cards and dice shall be	4(e)(1) Playing cards and dice must be maintained in a		
1	maintained in a secure location to prevent unauthorized	maintained in a secure location to prevent	secure location to prevent unauthorized access and to		
1	access and reduce the possibility of tampering.	unauthorized access and to reduce the possibility of	reduce the possibility of tampering.		
		tampering.			
	Used cards and dice shall be marked immediately		4(e)(2) Used cards and dice must be maintained in a		
	following removal from play then maintained in a secure	in a secure location until marked, scored, or destroyed	secure location until marked, scored, or destroyed, in a		
_	location until "scored" or "destroyed" to prevent		manner as approved by the Tribal gaming regulatory		
2	unauthorized access and reduce the possibility of	, , , , , , , , , , , , , , , , , , , ,	authority, to prevent unauthorized access and reduce		
	tampering. A destruction method shall be approved by		the possibility of tampering.		
	the CNGC.	the possibility of tampening.	the possibility of tampering.		
	The CNGC, or the gaming operation as approved by the	542.12(f)(3) The Tribal gaming regulatory authority, or	4(e)(3) Controls must be established and procedures		The CNGC, or the gaming operation as approved by the
	CNGC, shall establish and the operation shall comply		implemented that establish a reasonable time period,		CNGC, shall establish controls and the operation shall
	with a reasonable time period, which shall not exceed	gaming regulatory authority, shall establish and the	within which to mark, cancel, or destroy cards and dice		comply with procedures implemented that establish a
	seven (7) days, within which to mark, cancel or destroy		from play.		reasonable time period, which shall not exceed seven
	-	, ,	lioni piay.		·
		· · · · · · · · · · · · · · · · · · ·	A(-)(2)(i) This standard describes a subscribe as a levine		(7) days, within which to mark, cancel or destroy cards
	are retained for an investigation.		4(e)(3)(i) This standard does not apply where playing		or dice from play. This standard shall not apply where
			cards or dice are retained for an investigation.		playing cards or dice are retained for an investigation.
		where playing cards and dice are retained for an			
		investigation.			
	A control log shall be maintained that documents when	542.12(f)(4) A card control log shall be maintained	4(e)(4) A card and/or dice control log must be		
	cards and dice are received on site, distributed to and	that documents when cards and dice are received on	maintained that documents when cards and dice are		
4	returned from tables, and removed from the gaming	site, distributed to and returned from tables, and	received on site, distributed to and returned from tables		
	operation.		and removed from play by the gaming operation.		
	operation.	Temoved from play by the gaming operation.	and removed from play by the gaming operation.		
	Notwithstanding paragraph (A)(3) of this section, if a	542.12(g) <i>Plastic cards</i> . Notwithstanding paragraph	4(f) Plastic cards. If a gaming operation uses plastic		
	gaming operation uses plastic cards (not plastic-coated	(f) of this section, if a gaming operation uses plastic	cards (not plastic-coated cards), the cards may be used		
	cards), the cards may be used for up to three months if	cards (not plastic-coated cards), the cards may be	for up to three (3) months if the plastic cards are		
_		used for up to three (3) months if the plastic cards are	routinely inspected, and washed or cleaned in a manner		
5	cleaned in a manner and time frame approved by the		and time frame approved by the Tribal gaming		
	CNGC.		regulatory authority.		
		gaming regulatory authority.			
		5. 55,,·			
	Chip(s) and token(s). Controls must be established and	3 3	10(g) Chip(s) and token(s). Controls must be established	543.18(g) Chip(s) and token(s). Controls must be	
	procedures implemented to ensure accountability of	regulatory authority, or the gaming operation as	and procedures implemented to ensure accountability	established and procedures implemented to ensure	
	chip and token inventory. Such controls must include,		of chip and token inventory. Such controls must include,	, accountability of chip and token inventory. Such	
	but are not limited to, the following:	shall establish and the gaming operation shall comply	· · · · · · · · · · · · · · · · · · ·	controls must include, but are not limited to, the	
		with procedures for the receipt, inventory, storage,		following:	
		and destruction of gaming chips and tokens.			
	Purchase;		10(g)(1) Purchase;	543.18(g)(1) Purchase;	
	Receipt;	542.14(e) <i>Chip and token standards</i> . The Tribal gaming	10(g)(2) Receipt;	543.18(g)(2) Receipt;	
		regulatory authority, or the gaming operation as			
		approved by the Tribal gaming regulatory authority,			
2		shall establish and the gaming operation shall comply			
		with procedures for the <b>receipt</b> , inventory, storage,			
		and destruction of gaming chips and tokens.			

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	Inventory;	542.14(e) Chip and token standards. The Tribal gaming		543.18(g)(3) Inventory;	
		regulatory authority, or the gaming operation as			
		approved by the Tribal gaming regulatory authority,			
3		shall establish and the gaming operation shall comply			
		with procedures for the receipt, <b>inventory</b> , storage,			
		and destruction of gaming chips and tokens.			
	Storage; and	542.14(e) Chip and token standards. The Tribal gaming	10(g)(4) Storage; and	543.18(g)(4) Storage; and	
		regulatory authority, or the gaming operation as			
_		approved by the Tribal gaming regulatory authority,			
4		shall establish and the gaming operation shall comply			
		with procedures for the receipt, inventory, <b>storage</b> ,			
		and destruction of gaming chips and tokens.			
	Destruction.	542.14(e) <i>Chip and token standards</i> . The Tribal gaming	10(a)(5) Destruction.	543.18(g)(5) Destruction.	
		regulatory authority, or the gaming operation as	25(g)(5) 2 551 detto:::	5 151 <b>2</b> 5(g)(5) 2 6511 delilo111	
		approved by the Tribal gaming regulatory authority,			
5		shall establish and the gaming operation shall comply			
		with procedures for the receipt, inventory, storage,			
		and <b>destruction</b> of gaming chips and tokens.			
8.6	Progressive Table Games.	542.9(h) Standards for promotional progressive pots		8.6	Progressive Table Games.
		and pools.			All for the contributed by allowing both the great about the
		542.9(h)(1) All funds contributed by players into the pools shall be returned when won in accordance with			All funds contributed by players into the pools shall be returned when won in accordance with the posted rules
		l'		A	with no commission or administrative fee withheld.
		the posted rules with no commission or administrative fee withheld.			with no commission or administrative fee withheid.
		542.9(h)(2) Rules governing promotional pools shall			Rules governing promotional pools shall be
		be conspicuously posted and designate:		В	conspicuously posted and designate:
		542.9(h)(2)(i) The amount of funds to be contributed			The amount of funds to be contributed from each pot;
		from each pot;		1	μ,
		542.9(h)(2)(ii) What type of hand it takes to win the		2	What type of hand it takes to win the pool (e.g., what
		pool (e.g., what constitutes a "bad beat");		2	constitutes a "bad beat");
		542.9(h)(2)(iii) How the promotional funds will be paid		3	How the promotional funds will be paid out;
		out;		3	
		542.9(h)(2)(iv) How/when the contributed funds are		4	How/when the contributed funds are added to the
		added to the jackpots; and			jackpots; and
		542.9(h)(2)(v) Amount/percentage of funds allocated			Amount/percentage of funds allocated to primary and
		to primary and secondary jackpots, if applicable.		5	secondary jackpots, if applicable.
		542.9(h)(3) Promotional pool contributions shall not			Promotional pool contributions shall not be placed in or
		be placed in or near the rake circle, in the drop box,			near the rake circle, in the CISC, or commingled with
		or commingled with gaming revenue from card		C	gaming revenue from card games or any other
		games or any other gambling game.			gambling game.
		542.9(h)(4) The amount of the jackpot shall be			The amount of the jackpot shall be conspicuously
		conspicuously displayed in the card room.		D	displayed in the card room.
		542.9(h)(5) At least once a day, the posted pool			At least once a day, the posted pool amount shall be
		amount shall be updated to reflect the current pool		E	updated to reflect the current pool amount.
		amount.			
		542.9(h)(6) At least once a day, increases to the			At least once a day, increases to the posted pool
		posted pool amount shall be reconciled to the cash		F	amount shall be reconciled to the cash previously
		previously counted or received by the cage by			counted or received by the cage by an agent
		personnel independent of the card room.			independent of the card room.

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		542.9(h)(7) All decreases to the pool must be properly documented, including a reason for the decrease.		G	All decreases to the pool must be properly documented, including a reason for the decrease.
		542.9(i)(5) The posted pool amount shall then be updated to reflect the current pool amount.		н	The posted pool amount shall then be updated to reflect the current pool amount.
8.6	Analysis of Table Game Performance.	542.12(i) Analysis of table game perfomance standards.	4(g) Analysis of table game performance standards.	8.6	Analysis of Table Game Performance.
А	Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift. Records reflecting hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date.	542.12(i)(1) Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift. 542.12(i) (2) Records reflecting hold percentage by table and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date.	4(g)(1) Records must be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift.  4(g)(2) Records reflecting hold percentage by table and type of game must be maintained by shift, by day, cumulative month-to-date, and cumulative year-to-date	A	Records shall be maintained by day and shift indicating- any single-deck blackjack games that were dealt for an- entire shift. Records reflecting hold percentage by table- and type of game shall be maintained by shift, by day, cumulative month-to-date, and cumulative year-to- date.
В	This information shall be presented to and reviewed by management independent of the pit department on at least a monthly basis.	and reviewed by management independent of the pit	4(g)(3) This information must be presented to and reviewed by management independent of the pit department on at least a monthly basis.	В	This information shall be presented to and reviewed by management independent of the pit department on at least a monthly basis.
С	The management in Section 8.6 (B) shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel.		4(g)(4) The management in paragraph (g)(3) of this section must investigate any unusual fluctuations in hold percentage with pit supervisory agents.	c	The management in Section 8.6 (B) shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel.
D	The results of such investigations shall be documented, maintained for inspection, and provided to the CNGC upon request.	documented, maintained for inspection, and provided	4(g)(5) The results of such investigations must be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	Ð	The results of such investigations shall be documented, maintained for inspection, and provided to the CNGC upon request.
8.7	Accounting and Auditing Standards.	542.12(j) Accounting/auditing standards.	13 Auditing Revenue (d)(3) Table games.	8.7	
A	The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.	542.12(j)(1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.		A	The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.
В	If a table game has the capability to determine drop (e.g., bill-in drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.	determine drop (e.g., bill-in/coin-drop meters, bill	13(d)(3)(i) If a table game has the capability to determine drop (e.g., bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.	В	If a table game has the capability to determine drop- (e.g., bill-in drop meters, bill acceptor, computerized- record, etc.) the dollar amount of the drop shall be- reconciled to the actual drop by shift.
	Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.	542.12(j)(3) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of	13(d)(3)(ii) Accounting/auditing agents shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.	c	Accounting/auditing-employees shall review exception- reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.
	All noted improper transactions or unusual occurrences shall be investigated with the results documented.	542.12(j)(4) All noted improper transactions or unusual occurrences shall be investigated with the results documented.		D	All noted improper transactions or unusual occurrences- shall be investigated with the results documented.
	Evidence of table games auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to CNGC upon request.	542.12(j)(5) Evidence of table games auditing	13(d)(3)(iii) All noted improper transactions or unusual occurrences shall be investigated with the results documented.	E	Evidence of table games auditing procedures and any follow-up-performed shall be documented, maintained for inspection, and provided to CNGC upon request.
	A daily recap shall be prepared for the day and month-to-date, which shall include the following information:	542.12(j)(6) A daily recap shall be prepared for the day and month-to-date, which shall include the following	13(d)(3)(iv) A daily recap shall be prepared for the day and month-to-date, which shall include the following information:	F	A daily recap shall be prepared for the day and month- to-date, which shall include the following information:

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1	Drop;	542.12(j)(6)(i) Drop;	13(d)(3)(iv)(A) Drop;	1	Drop;
2	Win (Player pool); and	542.12(j)(6)(ii) Win; and	13(d)(3)(iv)(B) Win; and	2	Win (Player pool); and
3	Gross Revenue.	542.12(j)(6)(iii) Gross revenue.	13(d)(3)(iv)(C) Gross revenue.	3	Gross Revenue.
		542.12(k) Marker credit play.	4(h) Marker credit play.	8.7	Marker Credit Play.
		542.12(k)(1) If a gaming operation allows marker	4(h)(1) If a gaming operation allows marker credit play		If a gaming operation allows marker credit play
		credit play (exclusive of rim credit and call bets), the	(exclusive of rim credit and call bets), the following		(exclusive of rim credit and call bets), the following
		following standards shall apply:	standards must apply:		standards shall apply:
		E42.12(1)(1)(1) A	4(1)(4)(2) A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
		542.12(k)(1)(i) A marker system shall allow for credit	4(h)(1)(i) A marker system must allow for credit to be	A	A marker system shall allow for credit to be both issued
		to be both issued and repaid in the pit.	both issued and repaid in the pit.		and repaid in the pit.
		542.12(k)(1)(ii) Prior to the issuance of gaming credit	4(h)(1)(ii) Prior to the issuance of gaming credit to a		Prior to the issuance of gaming credit to a player, the
		to a player, the employee extending the credit shall	player, the agent extending the credit must contact a		agent extending the credit shall contact the cashier or
		contact the cashier or other independent source to	credit reporting bureau to determine if the player's	В	other independent source to determine if the player's
		determine if the player's credit limit has been	credit limit has been properly established and there is		credit limit has been properly established and there is
		properly established and there is sufficient remaining	sufficient remaining credit available for the advance.		sufficient remaining credit available for the advance.
		credit available for the advance.			
		542.12(k)(1)(iii) Proper authorization of credit	4(h)(1)(iii) Proper authorization of credit extension in		Proper authorization of credit extension in excess of the
		•		C	previously established limit shall be documented.
		shall be documented.	documented.		, , , , , , , , , , , , , , , , , , , ,
		542.12(k)(1)(iv) The amount of credit extended shall	4(h)(1)(iv) The amount of credit extended must be		The amount of credit extended shall be communicated
		be communicated to the cage or another	communicated to the independent source and the		to the cage or another independent source and the
		independent source and the amount documented	amount documented within a reasonable time	D	amount documented within a reasonable time
		within a reasonable time subsequent to each	subsequent to each issuance.		subsequent to each issuance.
		issuance.			
		542.12(k)(1)(v) The marker form shall be prepared in	4(h)(1)(v) The marker form must be prepared in at least		The marker form shall be prepared in at least triplicate
		at least triplicate form (triplicate form being defined	triplicate form with a preprinted or concurrently		form (triplicate form being defined as three parts
		as three parts performing the functions delineated in	printed marker number, and utilized in numerical		performing the functions delineated in (F) (1) (2) and (3)
		the standard in paragraph (k)(1)(vi) of this section),	sequence. (This requirement must not preclude the		of this section), with a preprinted or concurrently
		with a preprinted or concurrently printed marker	distribution of batches of markers to various pits.)	E	printed marker number, and utilized in numerical
		number, and utilized in numerical sequence. (This			sequence. (This requirement shall not preclude the
		requirement shall not preclude the distribution of			distribution of batches of markers to various pits.)
		batches of markers to various pits.)			
		5/2 12/b/(1)(vi) At least three parts of each constitution	A(b)(1)(vi) At least three parts of each congretal.		At least three parts of each separately numbered
		542.12(k)(1)(vi) At least three parts of each separately numbered marker form shall be utilized as follows:	4(h)(1)(vi) At least three parts of each separately numbered marker form must be utilized as follows:		marker form shall be utilized as follows:
		munipered marker form shall be utilized as follows:	mumbered marker form must be utilized as Tollows:		marker form shall be utilized as follows.
		542.12(k)(1)(vi)(A) Original shall be maintained in the	4(h)(1)(vi)(A) Original must be maintained in the pit		Original shall be maintained in the pit until settled or
		pit until settled or transferred to the cage;	until settled or transferred to the cage;	1	transferred to the cage;
		This arith section of transferred to the cage,	and settied of transferred to the cage,		transferred to the cage,

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		542.12(k)(1)(vi)(B) Payment slip shall be maintained in	4(h)(1)(vi)(B) Payment slip must be maintained in the pit		Payment slip shall be maintained in the pit until the
		the pit until the marker is settled or transferred to the	until the marker is settled or transferred to the cage. If		marker is settled or transferred to the cage. If paid in
		cage. If paid in the pit, the slip shall be inserted in the	paid in the pit, the slip must be inserted in the table	2	the pit, the slip shall be inserted in the CISC. If not paid
		table game drop box. If not paid in the pit, the slip	game drop box. If not paid in the pit, the slip must be	2	in the pit, the slip shall be transferred to the cage with
			transferred to the cage with the original;		the original;
			y y		
		·	4(h)(1)(vi)(C) Issue slip must be inserted into the		Issue slip shall be inserted into the appropriate CISC
			appropriate table game drop box when credit is	3	when credit is extended or when the player has signed
		extended or when the player has signed the original.	extended or when the player has signed the original.		the original.
		540 404 V(4) ( **) ) )	4(1)(4)(1)(1)(1)		
		_	4(h)(1)(vii) When marker documentation (e.g., issue slip		When marker documentation (e.g., issue slip and
			and payment slip) is inserted in the drop box, such	G	payment slip) is inserted in the CISC, such action shall
		box, such action shall be performed by the dealer or	action must be performed by the dealer at the table.		be performed by the dealer or boxperson at the table.
		boxperson at the table.	A/h//1/(.iii) A up agud agust ba upaistais and that dataile		A versual shall be versioned that details the falls with a
			4(h)(1)(viii) A record must be maintained that details	Н	A record shall be maintained that details the following
		details the following (e.g., master credit record	the following (e.g., master credit record retained at the	П	(e.g., master credit record retained at the pit podium):
			pit podium): 4(h)(1)(viii)(A) The signature or initials of the person(s)		The signature or initials of the agent(s) approving the
		person(s) approving the extension of credit (unless	approving the extension of credit (unless such		extension of credit (unless such information is
		[· · · · · · · · · · · · · · · · · · ·	information is contained elsewhere for each issuance);	1	contained elsewhere for each issuance);
			information is contained eisewhere for each issuance),		contained eisewhere for each issuance),
		issuance); 542.12(k)(1)(viii)(B) The legible name of the person	4(h)(1)(viii)(B) The legible name of the person receiving		The legible name of the person receiving the credit;
		-	the credit;	2	The registe name of the person receiving the creat,
			4(h)(1)(viii)(C) The date and shift of granting the credit;		The date and shift of granting the credit;
		credit;	(	3	
		·	4(h)(1)(viii)(D) The table on which the credit was	,	The table on which the credit was extended;
		extended;	extended;	4	
		542.12(k)(1)(viii)(E) The amount of credit issued;	4(h)(1)(viii)(E) The amount of credit issued;	5	The amount of credit issued;
		The marker number; 542.12(k)(1)(viii)(F)	4(h)(1)(viii)(F) The marker number;	6	The marker number;
		542.12(k)(1)(viii)(G) The amount of credit remaining	4(h)(1)(viii)(G) The amount of credit remaining after		The amount of credit remaining after each issuance or
		after each issuance or the total credit available for all	each issuance or the total credit available for all	7	the total credit available for all issuances;
		issuances;	issuances;		
			4(h)(1)(viii)(H) The amount of payment received and		The amount of payment received and nature of
			nature of settlement (e.g., credit slip number, cash,	8	settlement (e.g., credit slip number, cash, chips, etc.);
			chips, etc.); and		and
			4(h)(1)(viii)(I) The signature or initials of the person	9	The signature or initials of the person receiving
		person receiving payment/settlement.	receiving payment/settlement.		payment/settlement.
			4(h)(1)(ix) The forms required in paragraphs (h)(1)(v),		The forms required in (E) (F) and (H) of this section shall
			(vi), and (viii) of this section must be safeguarded, and	T	be safeguarded, and adequate procedures shall be
			adequate procedures must be employed to control the	1	employed to control the distribution, use, and access to
			distribution, use, and access to these forms.		these forms.
		to these forms.  542.12(k)(1)(x) All credit extensions shall be initially	4(h)(1)(x) All credit extensions must be initially		All credit extensions shall be initially evidenced by
		The state of the s	evidenced by lammer buttons, which must be		lammer buttons, which shall be displayed on the table
				J	in public view and placed there by supervisory agents.
		displayed on the table in public view and placed there	, ,		in public view and placed there by supervisory agents.
		by supervisory personnel.  542.12(k)(1)(xi) Marker preparation shall be initiated	by supervisory agents. 4(h)(1)(xi) Marker preparation must be initiated and		Marker preparation shall be initiated and other records
			other records updated within approximately one hand		updated within approximately one hand of play
			of play following the initial issuance of credit to the	K	following the initial issuance of credit to the player.
			player.		ionowing the initial issuance of create to the player.
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		542.12(k)(1)(xii) Lammer buttons shall be removed	4(h)(1)(xii) Only the dealer moves lammer buttons from		Lammer buttons shall be removed only by the dealer or
			the table into the table tray, or moves lammer buttons		boxperson employed at the table upon completion of a
			to a neutral area for subsequent removal by pit		marker transaction.
		·	supervisory personnel. This procedure is performed	L	
			when the marker issue slip is placed in the table game		
			drop box.		
		542.12(k)(1)(xiii) The original marker shall contain at	4(h)(1)(xiii) The original marker must contain at least		The original marker shall contain at least the following
		least the following information:	the following information:	M	information:
		542.12(k)(1)(xiii)(A) Marker number;	4(h)(1)(xiii)(A) Marker number;	1	Marker number;
		542.12(k)(1)(xiii)(B) Player's name and signature;	4(h)(1)(xiii)(B) Player's name and signature;	2	Player's name and signature;
		542.12(k)(1)(xiii)(C) Date; and	4(h)(1)(xiii)(C) Date; and	3	Date; and
		542.12(k)(1)(xiii)(D) Amount of credit issued.	4(h)(1)(xiii)(D) Amount of credit issued.	4	Amount of credit issued.
		542.12(k)(1)(xiv) The issue slip or stub shall include	4(h)(1)(xiv) The issue slip or stub must include the same		The issue slip or stub shall include the same marker
		the same marker number as the original, the table	marker number as the original, the table number, date		number as the original, the table number, date and time
		number, date and time of issuance, and amount of	and time of issuance, and amount of credit issued. The		of issuance, and amount of credit issued. The issue slip
		credit issued. The issue slip or stub shall also include	issue slip or stub must also include the signature of the		or stub shall also include the signature of the agent
		the signature of the person extending the credit, and	agent extending the credit, and the signature or initials	N	extending the credit, and the signature or initials of the
		the signature or initials of the dealer or boxperson at	of the dealer at the applicable table, unless this	IN .	dealer or boxperson at the applicable table, unless this
		the applicable table, unless this information is	information is included on another document verifying		information is included on another document verifying
		included on another document verifying the issued	the issued marker.		the issued marker.
		marker.	are issued marker.		the issued market.
		market.			
		542.12(k)(1)(xv) The payment slip shall include the	4(h)(1)(xv) The payment slip must include the same		The payment slip shall include the same marker number
		same marker number as the original. When the	marker number as the original. When the marker is paid		as the original. When the marker is paid in full in the pit,
		_	in full in the pit, it must also include the table number		it shall also include the table number where paid, date
			where paid, date and time of payment, nature of		and time of payment, nature of settlement (cash, chips,
		·			etc.), and amount of payment. The payment slip shall
		payment. The payment slip shall also include the	The payment slip must also include the signature of pit	0	also include the signature of pit supervisory agent
			supervisory agent acknowledging payment, and the	O	acknowledging payment, and the signature or initials of
		payment, and the signature or initials of the dealer or			the dealer or boxperson receiving payment, unless this
		boxperson receiving payment, unless this information			information is included on another document verifying
			document verifying the payment of the marker.		the payment of the marker.
		payment of the marker.	document verifying the payment of the marker.		the payment of the marker.
		payment of the marker.			
		542.12(k)(1)(xvi) When partial payments are made in	4(h)(1)(xvi) When partial payments are made in the pit,		When partial payments are made in the pit, a new
		the pit, a new marker shall be completed reflecting	a new marker must be completed reflecting the		marker shall be completed reflecting the remaining
		the remaining balance and the marker number of the	remaining balance and the marker number of the	P	balance and the marker number of the marker originally
		marker originally issued.	marker originally issued.		issued.
			3 ,		
		542.12(k)(1)(xvii) When partial payments are made in	4(h)(1)(xvii) When partial payments are made in the pit,		When partial payments are made in the pit, the
		the pit, the payment slip of the marker that was	the payment slip of the marker that was originally		payment slip of the marker that was originally issued
		originally issued shall be properly cross-referenced to	issued must be properly cross-referenced to the new		shall be properly cross-referenced to the new marker
			marker number, completed with all information required	Q	number, completed with all information required by (O)
		·	by paragraph (h)(1)(xv) of this section, and inserted into		of this section, and inserted into the CISC.
			the drop box.		
			'		
		542.12(k)(1)(xviii) The cashier's cage or another	4(h)(1)(xviii) The independent source must be notified		The cashier's cage or another independent source shall
		independent source shall be notified when payments	when payments (full or partial) are made in the pit so		be notified when payments (full or partial) are made in
		(full or partial) are made in the pit so that cage	that cage records can be updated for such transactions.		the pit so that cage records can be updated for such
			Notification must be made no later than when the	R	transactions. Notification shall be made no later than
			customer's play is completed or at shift end, whichever		when the patron's play is completed or at shift end,
			is earlier.		whichever is earlier.
		whichever is earlier.			
		extinctic ver to conflet.	•	<u> </u>	

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	542.12(k)(1)(xix) All portions of markers, both issued	4(h)(1)(xix) All portions of markers, both issued and		All portions of markers, both issued and unissued, shall
	and unissued, shall be safeguarded and procedures	unissued, must be safeguarded and procedures must	S	be safeguarded and procedures shall be employed to
		be employed to control the distribution, use and access	5	control the distribution, use and access to the forms.
	access to the forms.	to the forms.		
	542.12(k)(1)(xx) An investigation shall be performed	4(h)(1)(xx) An investigation must be performed to		An investigation shall be performed to determine the
	to determine the cause and responsibility for loss	determine the cause and responsibility for loss		cause and responsibility for loss whenever marker
	whenever marker forms, or any part thereof, are	whenever marker forms, or any part thereof, are		forms, or any part thereof, are missing. These
	missing. These investigations shall be documented,	missing. These investigations must be documented,	Т	investigations shall be documented, maintained for
	maintained for inspection, and provided to the Tribal	maintained for inspection, and provided to the Tribal		inspection, and provided to the CNGC upon request.
	gaming regulatory authority upon request.	gaming regulatory authority upon request.		
	542.12(k)(1)(xxi) When markers are transferred to the	4(h)(1)(xxi) When markers are transferred to the cage,		When markers are transferred to the cage, marker
	cage, marker transfer forms or marker credit slips (or	marker transfer forms or marker credit slips (or similar		transfer forms or marker credit slips (or similar
	similar documentation) shall be utilized and such	documentation) must be utilized and such documents		documentation) shall be utilized and such documents
	documents shall include, at a minimum, the date,	must include, at a minimum, the date, time, shift,		shall include, at a minimum, the date, time, shift, marker
	time, shift, marker number(s), table number(s),	marker number(s), table number(s), amount of each		number(s), table number(s), amount of each marker, the
	amount of each marker, the total amount transferred,	marker, the total amount transferred, signature of pit	U	total amount transferred, signature of pit supervisory
	signature of pit supervisory personnel releasing	supervisory agent releasing instruments from the pit,		agent releasing instruments from the pit, and the
	instruments from the pit, and the signature of cashier	and the signature of agent verifying receipt of		signature of cashier verifying receipt of instruments at
	verifying receipt of instruments at the cage.	instruments at the cage.		the cage.
		, and the second		
	542 12(1)(1)(a)() All as a decrease to the accordance of a	A/LV/AV(===================================		All as a discussion of all has to a conformal to the consequence of the first
	542.12(k)(1)(xxii) All markers shall be transferred to	4(h)(1)(xxii) All markers must be transferred to the cage	, v	All markers shall be transferred to the cage within
	the cage within twenty-four (24) hours of issuance.	within twenty-four (24) hours of issuance.	V	twenty-four (24) hours of issuance.
	542.12(k)(1)(xxiii) Markers shall be transported to the	4(h)(1)(xxiii) Markers must be transported to the		Markers shall be transported to the cashier's cage by an
	cashier's cage by a person who is independent of the	cashier's cage by an agent who is independent of the		agent who is independent of the marker issuance and
	marker issuance and payment functions (pit clerks	marker issuance and payment functions (pit clerks may	W	payment functions (pit clerks may perform this
	may perform this function).	perform this function).		function).
	may periorin this function).	periorii tiiis Turictiori).		itunction).
	542.12(I) Name credit instruments accepted in the pit.	4(i) Name credit instruments accepted in the pit.	8.8	Name Credit Instruments Accepted in the Pit.
	542.12(l)(1) For the purposes of this paragraph, name	4(i)(1) For the purposes of this paragraph, name credit		For the purposes of this paragraph, name credit
	, , , , , , , , , , , , , , , , , , , ,	instruments means personal checks, payroll checks,		instruments means personal checks, payroll checks,
		counter checks, hold checks, traveler's checks, or other		counter checks, hold checks, traveler's checks, or other
		similar instruments that are accepted in the pit as a	A	similar instruments that are accepted in the pit as a
	•	form of credit issuance to a player with an approved		form of credit issuance to a player with an approved
		credit limit.		credit limit.
	approved credit innic	create initia		create mine.
	542.12(l)(2) The following standards shall apply if	4(i)(2) The following standards must apply if name		The following standards shall apply if name credit
	name credit instruments are accepted in the pit:	credit instruments are accepted in the pit:	В	instruments are accepted in the pit:
		·		·
	542.12(l)(2)(i) A name credit system shall allow for the	4(i)(2)(i) A name credit system must allow for the	1	A name credit system shall allow for the issuance of
	issuance of credit without using markers;	issuance of credit without using markers;	1	credit without using markers;
	542.12(l)(2)(ii) Prior to accepting a name credit	4(i)(2)(ii) Prior to accepting a name credit instrument,		Prior to accepting a name credit instrument, the agent
	instrument, the employee extending the credit shall	the employee extending the credit must contact the		extending the credit shall contact the cashier or other
	contact the cashier or another independent source to	cashier or another independent source to determine if		independent source to determine if the player's credit
	determine if the player's credit limit has been	the player's credit limit has been properly established	2	limit has been properly established and the remaining
	properly established and the remaining credit	and the remaining credit available is sufficient for the		credit available is sufficient for the advance;
	available is sufficient for the advance;	advance;		

REF		542	NIGC Class III Guidance	543	Recommended Revisions
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		542.12(l)(2)(iii) All name credit instruments shall be	4(i)(2)(iii) All name credit instruments must be		All name credit instruments shall be transferred to the
		transferred to the cashier's cage (utilizing a two-part	transferred to the cashier's cage (utilizing a two-part		cashier's cage (utilizing a two-part order for credit)
		order for credit) immediately following the	order for credit) immediately following the acceptance		immediately following the acceptance of the instrument
			of the instrument and issuance of chips (if name credit	3	and issuance of chips (if name credit instruments are
		name credit instruments are transported	linstruments are transported accompanied by a credit		transported accompanied by a credit slip, an order for
		accompanied by a credit slip, an order for credit is not	Islip, an order for credit is not required);		credit is not required);
		required);			
		542.12(l)(2)(iv) The order for credit (if applicable) and	4(i)(2)(iv) The order for credit (if applicable) and the		The order for credit (if applicable) and the credit slip
		the credit slip shall include the customer's name,	credit slip must include the customer's name, amount of		shall include the patron's name, amount of the credit
		amount of the credit instrument, the date, time, shift,	the credit instrument, the date, time, shift, table		instrument, the date, time, shift, table number,
		table number, signature of pit supervisory personnel	number, signature of pit supervisory agent releasing	1	signature of pit supervisory agent releasing instrument
		releasing instrument from pit, and the signature of	instrument from pit, and the signature of the agent		from pit, and the signature of the cashier verifying
		the cashier verifying receipt of instrument at the cage;	I		receipt of instrument at the cage;
			4(i)(2)(v) The procedures for transacting table credits at		The procedures for transacting table credits in 8.2 of
			· · · · · · · · · · · · · · · · · · ·		
			standards in paragraphs (b)(11) through (18) of this	5	this section shall be strictly adhered to; and
		of this section shall be strictly adhered to; and	section must be strictly adhered to; and		
			4(i)(2)(vi) The acceptance of payments in the pit for		The acceptance of payments in the pit for name credit
			name credit instruments must be prohibited.	6	instruments shall be prohibited.
		for name credit instruments shall be prohibited.	marile credit instruments must be prombited.		instruments shall be prombited.
			4(j) Call bets.	8.9	Call Bets.
			4(j)(1) The following standards must apply if call bets are		The following standards shall apply if call bets are
			accepted in the pit:		accepted in the pit:
		·	4(j)(1)(i) A call bet must be evidenced by the placement		A call bet shall be evidenced by the placement of a
		-	of a lammer button, chips, or other identifiable		lammer button, chips, or other identifiable designation
		·	designation in an amount equal to that of the wager in	A	in an amount equal to that of the wager in a specific
			a specific location on the table;		location on the table;
		ane wager in a specific location on the table,	a specific location on the table,		Total on the table,
		542.12(m)(1)(ii) The placement of the lammer button,	4(j)(1)(ii) The placement of the lammer button, chips, or		The placement of the lammer button, chips, or other
		chips, or other identifiable designation shall be	other identifiable designation must be performed by		identifiable designation shall be performed by
		performed by supervisory/boxperson personnel. The	supervisory/boxperson agents. The placement may be	R	supervisory/boxperson agents. The placement may be
		placement may be performed by a dealer only if the	performed by a dealer only if the supervisor physically		performed by a dealer only if the supervisor physically
		supervisor physically observes and gives specific	observes and gives specific authorization;		observes and gives specific authorization;
		authorization:			
			4(j)(1)(iii) The call bet must be settled at the end of each		The call bet shall be settled at the end of each hand of
		. , ,	hand of play by the preparation of a marker, repayment		play by the preparation of a marker, repayment of the
			of the credit extended, or the payoff of the winning	C	credit extended, or the payoff of the winning wager. Cal
			wager. Call bets extending beyond one hand of play		bets extending beyond one hand of play shall be
		beyond one hand of play shall be prohibited; and	must be prohibited; and		prohibited; and
		542.12(m)(1)(iv) The removal of the lammer button,	4(j)(1)(iv) Only the dealer moves lammer buttons from		Only the dealer moves lammer buttons from the table
			the table into the table tray, or moves lammer buttons		into the table tray, or moves lammer buttons to a
			to a neutral area for subsequent removal by pit		neutral area for subsequent removal by pit supervisory
			supervisory personnel. This procedure is performed at	D	personnel. This procedure is performed at the
		·	the completion of the call bet transaction.		completion of the call bet transaction.
			and completion of the can bet dansaction.		completion of the call bet transaction.
			4(k) Rim credit.	8.10	Rim Credit.
			4(k)(1) The following standards must apply if rim credit		The following standards shall apply if rim credit is
		credit is extended in the pit:	is extended in the pit:		extended in the pit:

detays to a place or a recent as the selective type the selective type the selective type the selective type to a place or a recent as the continuent and selective type to the selective type or selective type to the selective type type type type type type type typ	REF	542	NIGC Class III Guidance	543	Recommended Revisions
Service of the content of the conten	Section 8 - Table Games		BULLETIN 2018-3		
sources of clique to be based in motival and extended to the paths of the customer for the customer and a customer to object on the customer for the customer for the customer and a customer to object on the customer for the customer and a customer to object on the customer for the customer and a customer and a customer to object on the customer for the customer and a customer and a customer to the customer for the customer and a customer and a customer to the customer of the customer and a customer to the customer and a customer and a customer to the customer and		E 40 404 \(\dagger)(1) \(\text{P}\)	4(k)(1)(i) Rim credit must be evidenced by the issuance		Rim credit shall be evidenced by the issuance of chips
the total acordinon antimords in the collabor of the contractive cologies control of the cologies cologies control of the cologies cologie			of chips to be placed in a neutral zone on the table and		to be placed in a neutral zone on the table and then
Secretic and the excitation of the southwarm is wager, in the treatment in wager for the southwarm shares and the sou		·	then extended to the customer for the customer to		extended to the patron for the patron to wager, or to
Service to Assign Core Core Defeated to Meaning for the patterns and shy the placement of a Chemon and the patterns and a Service state of the children of the			wager, or to the dealer to wager for the customer, and		
instance, and by the platement of a timer bustlers in ordered control and control and an another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to that of the control control and another seal to the control and anoth		customer to wager, or to the dealer to wager for the	1 -	A	placement of a lammer button or other identifiable
to the first feedback designation in an around coal be a to the claim securities and 5 242/0000.  \$152,226/0000 (first received on player and), or \$20,000					·
Set 2200/2000/CF received and 540 2200/CF received and pages cards, or animality used documents, which shall be recorded on pages cards, or animality used documents, which shall be set of the page cards or an important of the page of the page cards or an important of the page of the page cards or an important of the page of the page cards or an important of the page of the page cards or an important or an important of the page of the page cards or an important or an importa		or other identifiable designation in an amount equal			
### \$2.20(13)(16) Fire crank shall be recorded on player or exhally used documents, which shall be: exhally recorded or concurrently unablesed and account of the play department on		to that of the chips extended; and 542.12(n)(1)(i)	and emps externeed, and		oxtonia da, ana
seath or surface of a decounted for the partnershed or concurrently numbered and accounted for by a department independent of the partnershed or concurrently numbered and accounted for by a department independent of the partnershed or concurrently numbered and accounted for by a department independent of the partnershed properties of the partnershed independent of the partnershed properties of the partnershed properties of the partnershed properties of the partnershed properties of a sovernous and this deeler attenting to the validay of each control and designation of a sovernous and the deeler attenting to the validay of each control and designation of a sovernous and the deeler attenting to the validay of each control and designation of the partnershed properties of the par			4(k)(1)(ii) Rim credit must be recorded on player cards,		Rim credit shall be recorded on player cards, or similarly
\$42.13(1)(1)(1) Presumbated and concurrently numbered and subsequent independent of the properties of the part of		542.12(n)(1)(ii) Rim credit shall be recorded on player	or similarly used documents, which must be:	В	used documents, which shall be:
independent of the pt  42.17(x)(1)(1)(1) For all neutrinosms and subsequent recognition, evidence by the initiation significant of spottaries of a regularity evidence of byte initiation significant of spottaries of a regularity evidence of byte initiation significant of spottaries of a regularity evidence of byte initiation significant of a spottaries of a regularity evidence of byte initiation significant of a spottaries of a regularity evidence of the section and subsequent recognition and the control of proceedings of the section of the section and repayment recognition of the section of the sect		cards, or similarly used documents, which shall be:			
independent of the pit.  Set 212/(0)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0) for all extensions and responses (SQL)(0)(0)(0) for a supervisor and the deliver straining to the validity of a supervisor for walling of the deliver straining to the validity of the deliver straining to the validity of the subsequent (SQL)(0)(0)(0) for all extensions and responses (SQL)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0)(0) for all extensions and exposure of a subsequent (SQL)(0)(0)(0) for all extensions and subsequent (SQL)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)		542.12(n)(1)(ii)(A) Prenumbered or concurrently	4(k)(1)(ii)(A) Prenumbered or concurrently numbered		Prenumbered or concurrently numbered and accounted
Independent of the pix.  4212/p(1)(0)(0) for all extensions and subsequent repayments. 4212/p(1)(0)(0) for all extensions and subsequent repayments, evidenced by the initials or signatures of a speciment with order of the declar attention of a supervisor and the declar attention of the setting of the wilding of a supervisor and the declar attention of the setting of the wilding of a supervisor and the declar attention of the setting of the wilding of a supervisor and the declar attention of the setting of the wilding of each renthine of the setting of the wilding of each renthine of the setting of the wilding of each renthine of the setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine of each restrict or setting of the wilding of each renthine or setting of the wilding of each renthine or each restrict or setting of the setting of t		numbered and accounted for by a department	and accounted for by a department independent of the	1	for by a department independent of the pit;
spanners, evidenced by the initials or signatures of a proprients, evidenced by the initials or signatures of a proprients and endealer attenting to the validity of a proprient of a proprient and the dealer attenting to the validity of a proprient of a proprient and the dealer attenting to the validity of a proprient of a proprient and the dealer attenting to the validity of a proprient of a proprient of the patient of a proprient of a proprient of the patient of a proprient of the patient of a proprient of a proprient of the patient of the		independent of the pit;	pit;		
repayments, evidenced by the initials or signatures of a supervior and the doeler attenting to the validity of each centre of the doeler attenting to the validity of each centre of the doeler attention and repayment.  94.222301430024 middation of the settlement method (e.g., settle number of invators sound, chips, cash):  95.00000000000000000000000000000000000			4(k)(1)(ii)(B) For all extensions and subsequent		For all extensions and subsequent repayments,
reportions and the dealer attesting to the validity of each confict extension and reportions and the systement extension and reportions and the systement method (e.g. serial number of marker sound, clips). Can'ty  Settle on later than when the consorrer leaves the state of which the card is prepared;  Settle on later than when the consorrer leaves the state and which the card is prepared;  Settle on later than when the consorrer leaves the state and which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the consorrer leaves the state at which the card is prepared;  Settle on later than when the posts and and state than when the partial leaves;  Settle on later than when the consorrer leaves the state at which the card is prepared;  40(1)(0)(0) Trendered to the accounting department and state than when the partial leaves the cards, state cards, stat			•		evidenced by the initials or signatures of a supervisor
as supervisor and the decider attesting to the walling of each credit each cre				2	and the dealer attesting to the validity of each credit
seach credit extension and repayment.  \$422.120(10)(10)(2) in indication of the settlement method (e.g., serial number of marker issued, chips, cash); cash); Settled no later than when the customer leaves the tible at which the card is prepared;  \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$42.120(10)(10)(6) Transferred to the accounting department on a daily basis, and \$40(10)(10)(6) Transferred to the accounting department on a daily basis, and \$40(10)(10)(6) Transferred to the accounting department on a daily basis, and \$40(10)(10)(6) Transferred to the accounting department on a daily basis, and \$40(10)(10)(6) Transferred to the accounting department on a daily basis, and \$40(10)(10)		a supervisor and the dealer attesting to the validity of			
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method (e.g., serial number of marker issued, chips, cash); cash);  Settled no later than when the customer leaves the table at which the card is prepared.  4 at which the card is prepared.  542 (20)(10)(10)(1) Transferred to the accounting department on a daly basis, and separatement of the secondary that only the forms utilized to control the suance of pit credit (e.g., master credit records trecord tre		542.12(n)(1)(ii)(C) An indication of the settlement	4(k)(1)(ii)(C) An indication of the settlement method		An indication of the settlement method (e.g., serial
Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(ii)(ii) Settled no later than when the customer table at which the card is prepared. \$42.12(n)(1)(ii)(ii)(ii) Settled no later than when the customer users the table at which the card is prepared. \$42.12(n)(1)(ii)(ii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(ii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the table at which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the set which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer leaves the set which the card is prepared. \$42.12(n)(1)(iii)(iii) Settled no later than when the customer of the west on a daily bask and \$42.12(n)(1)(iii)(iii) Settled no later than when the customer of the excounting pleasured than a daily bask and \$42.12(n)(1)(iii)(iii) Settled no later than when the customer of the excounting the control of the card is prepared. \$44.12(n)(iii)(iii) Settled no later than when the customer of the cus		method (e.g., serial number of marker issued, chips,	(e.g., serial number of marker issued, chips, cash);	3	_
able at which the card is prepared:  4 at which the card is prepared:  54.212(n)(1)(iii) Fransferred to the accounting department on a daily basis; and on a daily basis; and on a daily basis; and separate on a daily basis; and separate on a daily basis; and on a daily basis; and separate on a daily basis; and separate on a daily basis; and separate on a daily basis; and department on the forei		cash);			
454.12(n)(1)(iii) Transferred to the accounting department department a daily basis; and		Settled no later than when the customer leaves the	4(k)(1)(ii)(D) Settled no later than when the customer		Settled no later than when the patron leaves the table
454.12(n)(1)(iii) Transferred to the accounting department department a daily basis; and		table at which the card is prepared; 542.12(n)(1)(ii)(D)		4	·
department on a daily basis; and  542 1207(1)(1)(fi) Reconciled with other forms utilized to to control the issuance of pit credit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  542 120 (or firedit (e.g., master credit records, table cards).  540 (or firedit (e.g., master credit records, table cards).  540 (or firedit (e.g., master credit record, table cards).  541 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  542 120 (or firedit (e.g., master credit record, table cards).  540 10 10 10 10 10 10 10 10 10 10 10 10 10					
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the exchange for chips or tokens;  foreign currency exchange forms include the country of origin, total face value, amount of chips/token extended (i.e., conversion amount), signature of supervisor/boxperson, and the dealer completic transaction;  supervisor/boxperson, and the dealer completic transaction;  due, conversion amount), signature of supervisor/boxperson, and the dealer completic transaction;  4(0)(3) Foreign currency exchange forms and the foreign currency exchange forms and the foreign currency shall be inserted in the drop box by the dealer, and			1	A	currency exchange form before the exchange for chips
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by the dealer; and  542.12(o)(1)(iv) Alternate procedures specific to the use of foreign use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority.  by the dealer; and  4(l)(4)Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority.  D Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority.  Or the gaming operation as approved by the Tribal gaming regulatory authority.			1	С	currency shall be inserted in the CISC by the dealer; and
542.12(o)(1)(iv) Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority.  4(l)(4)Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority.  Alternate procedures specific to the use of foreign valued gaming chips shall be developed by the Tribal gaming regulatory authority.  D was approved by the Tribal gaming regulatory authority.		1	, , ,		
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developed by the Tribal gaming regulatory authority, or the gaming operation or the gaming operation as approved by the Tribal gaming regulatory authority.  gaming regulatory authority.  gaming regulatory authority.  D or the gaming operation as approved by the Tribal gaming regulatory authority.		·			
or the gaming operation as approved by the Tribal as approved by the Tribal gaming regulatory authority.				D	
gaming regulatory authority.					or and garming operation as approved by the civoc.
Quilling requisitory authority.			as approved by the Tribal gaining regulatory authority.		
0,0   Utner Standards   R.R. 8.12   Other Standards	8.8 Other Standards	Iganning regulatory authority.		88.812	Other Standards

REF		542	NIGC Class III Guidance	543	Recommended Revisions
	Section 8 - Table Games		BULLETIN 2018-3		
	Points awarded for qualifying games shall adhere to the				
Α	standards in Section 17 – Player Tracking System, as				
	applicable.				
	The procedures for the collection of the table game	542.12(b) Standards for drop and count . The			
D D	drop and the count thereof shall comply with Section 12	procedures for the collection of table game drop and			
J 6	– Drop and Count, as applicable to the tier level of	the count thereof shall comply with §542.21, §542.31,			
	operation.	or §542.41 (as applicable).			
			4(m) All relevant controls from § 11, Information and	C	All relevant controls from Section 20 - Information
			Technology will apply.		Technology will apply.
			4(n) Revenue Audit. Standards for revenue audit of table	D	Standards for revenue audit of table games are
			games are contained in § 13, Revenue Audit.		contained in Section 22 - Revenue Audit.
			4(o) Variance. The operation must establish, as		Variance. The operation must establish, as approved by
			•		
			approved by the TGRA, the threshold level at which a		the CNGC, the threshold level at which a variance must
			variance must be reviewed to determine the cause. Any		be reviewed to determine the cause. Any such review
			such review must be documented.		must be documented.

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games						
9.1	Game Rules						
	Only card games authorized by the CNGC may				Prohibition of Unauthorized Gaming		
	be offered by the gaming operation.				No person licensed by the Gaming Commission shall		
					engage, conduct or condone any game in a facility under		
					the jurisdiction of the Gaming Commission unless such		
					game is approved by the Gaming Commission and		
					regulations for rules governing such game have been duly		
					promulgated and approved by the Gaming Commission.		
					CN LA 17-14 §27(A)		
					CIV EX 17 11 327 (V)		
					Authorization of Gaming		
					The Gaming Commission may authorize the playing of any		
Α					game not prohibited by the IGRA, any game not prohibited		
					by a Tribal-State Compact, and/or not specifically prohibited		
					by the laws of the State of Oklahoma. The Gaming		
					Commission shall promulgate regulations for rules		
					governing all authorized games, including regulations		
					governing the equipment, whether electronic or manual (e.g.		
					chips, cards, machines, computer systems, etc.) used in such		
					game. Any provision in a Tribal-State Compact with the		
					State of Oklahoma providing for testing, notice to, and		
					comment from the State shall be complied with before any		
					game is authorized by the Gaming Commission.		
					CN LA 17-14 §27(B)		
	Summaries of game rules must be visibly		Posted rules. The rules must be displayed or	Rules for Play of and Prizes for Covered			
	displayed or available for patron review at the		available for patron review at the gaming	Games. Summaries of the rules for			
	gaming operation, including rules governing		operation, including rules governing contests,	playing covered games and winning			
	contests, prize payouts, fees, the rake		prize payouts, fees, the rake collected, and the	prizes shall be visibly displayed in the			
	collected, the placing of antes, and points		placing of antes.	facility. Complete sets of rules shall be			
В	required to qualify for tournament play.		543.10(f)	available in pamphlet form in the facility.			
5				Tribal-State Compact Part 5 (G)			
9.2	Standards for Supervision	Charles for a superstate of Control of the Control	Companision Companision 11	Companies and in a of A. d. St. Tl.			Standards for Supervision
		<u>Standards for supervision.</u> Supervision shall be	Supervision. Supervision must be provided as	Supervisory Line of Authority. The			Supervision must shall be provided as at all
	during the card room operations by an agent	provided at all times the card room is in operation by		enterprise shall provide the TCA and SCA			times needed during the card room is in
	with authority equal to or greater than those	personnel with authority equal to or greater than those	1 -	with a chart of the supervisory lines of			operations by <del>an agent</del> personnel with
	being supervised.	being supervised. 542.9(c)(1)	those being supervised. 543.10 (a)	authority with respect to those directly			authority equal to or greater than those being
Α				responsible for the conduct of covered		Α	supervised.
				games, and shall promptly notify those			
				agencies of any material changes			
				thereto. 5(H)			

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games						334 131313
	A supervisor may function as a dealer without		A supervisor may function as a dealer without				
	any other supervision if disputes are resolved		any other supervision if disputes are resolved				
	by supervisory personnel independent of the		by supervisory personnel independent of the				
	transaction or independent of the card games		transaction or independent of the card games				
	department; or a dealer may function as a		department; or				
В	supervisor if not dealing the game.						
	supervisor if not dealing the game.		543.10 (a)(1)				
			A dealer may function as a supervisor if not				
			dealing the game.				
			543.10 (a)(2)				
		<u>Computer</u> <u>applications.</u> For any computer	•				
		applications utilized, alternate documentation and/or					
		procedures that provide at least the level of control					
		described by the standards in this section, as approved					
		by the Tribal gaming regulatory authority, will be					
		acceptable.					
		acceptable. 542 9(a)					
9.3	Exchanges or Transfers	.J <del>4</del> 2.7(d)					
	-	Exchanges between table banks and the main card	Exchanges or transfers. Exchanges between				
	3	room bank (or cage, if a main card room bank is not	table banks and the main card room bank (or				
	bank is not used) must be authorized by a	used) in excess of \$100.00 shall be authorized by a	cage, if a main card room bank is not used)				
	supervisor. All exchanges must be evidenced	supervisor. All exchanges shall be evidenced by the use	_				
A			exchanges must be evidenced by the use of a				
	of chips, tokens, and/or cash takes place at	and/or cash takes place at the table. 542.9(c)(2)	lammer unless the exchange of chips, tokens,				
		and/or cash takes place at the table. 542.9(c)(2)					
	the table.		and/or cash takes place at the table. If table				
	All exchanges shall be evidenced by the use of		banks are maintained at an imprest level and				
	a lammer unless the exchange of chips,		runners are used for the exchanges at the table,				
	tokens, cash, and/or cash equivalents takes		no supervisory authorization is required.				
	place at the table. If table banks are		543.10(b)(1)				
В	maintained at an imprest level and runners						
	•						
	are used for the exchanges at the table no						
	supervisory authorization is required.						
	Evchanges from the main card room hank for	Exchanges from the main card room bank (or cage, if	Exchanges from the main card room hank (or				
		_					
С			_				
	- I	-	the table banks must be verified by the card				
	card room dealer and the runner.	runner.	room dealer and the runner. 543.10(b)(2)				
	Transfers between the main card room bank	542.9(c)(3)  If applicable, transfers between the main card room	Transfers between the main card room bank				
		bank and the cage shall be properly authorized and	and the cage must be properly authorized and				
			documented. Documentation must be retained				
D							
	retained for at least twenty-four (24) hours.	542.9(c)(4)	for at least 24 hours.				
			543.10(b)(3)				
	A rake collected or ante placed shall be done	A rake collected or ante placed shall be done in					
E	<b>■</b>	accordance with the posted rules.					
	•	542.9(c)(5)					
9.4	Standards for Playing Instruments	J-42.3(C)(J)					
	Used playing cards that are not to be re-used		Playing cards. New and used playing cards				
	must be properly cancelled and removed from		must be maintained in a secure location, with				
А	service to prevent re-use. The removal and		appropriate surveillance coverage, and				
'`	cancellation procedure requires CNGC review		accessible only to authorized agents.				
			543.10(c)(1)				
L	and approval.		] 3+3.±0(C)(±)			l	

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF Recommended Revisions
	Section 9 - Card Games					
	New and used playing cards must be	<b>Standards for playing cards.</b> Playing cards shall be				
	maintained in a secure location, with	maintained in a secure location to prevent	Used playing cards that are not to be re-used			
1		l	must be properly cancelled and removed from			
			service to prevent re-use. The removal and			
		542.9(d)(1)	cancellation procedure requires TGRA review			
	Used playing cards, that are not to be re-used		and approval. 543.10(c)(2)			Used playing cards, that are not to be re-used
2	must be properly marked and removed from					must be properly marked and removed from
	service to prevent re-use.		Distinct and a second size of with an investigation			service to prevent re-use.
	Used playing cards shall be maintained in a	Used cards shall be maintained in a secure location	Playing cards associated with an investigation			
		luntil marked scored or destroyed in a manner	must be retained intact and outside of the			
		lannroved by the Tribal gaming regulatory authority to	established removal and cancellation			
3		provent unauthorized access and reduce the possibility	procedure.			2
		of tampering.	543.10(c)(3)			
	Tourse the processing of tampering.	542.9(d)(2)				
	CNGC, or the gaming operation as approved	The Tribal gaming regulatory authority, or the				
		gaming operation as approved by the Tribal gaming				
		regulatory authority, shall establish and the gaming				
4		operation shall comply with a reasonable time period,				3
		which shall not exceed seven (7) days, within which to				
	,	mark, cancel, or destroy cards from play. 542.9(d)(3)				
	nom play.	initiality currices, or destroy cards from play. 342.5(d)(3)				
	Playing cards associated with an investigation	This standard shall not apply where playing cards are				
_		retained for an investigation.				
5		542.9(d)(3)(i)				4
	procedures.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
		A card control log shall be maintained that				
	_	documents when cards and dice are received on site,				
		distributed to and returned from tables and removed				5
		from play by the gaming operation. 542.9(d)(4)				
	operation.	prompted by the gamming operations of Els(a)(1)				
		Plastic cards. Notwithstanding paragraph (d) of this				
		section, if a gaming operation uses plastic cards (not				
		plastic-coated cards), the cards may be used for up to				
		three (3) months if the plastic cards are routinely				
7		inspected, and washed or cleaned in a manner and				6
		time frame approved by the Tribal gaming regulatory				
		authority.				
		542.9(e)				
		Standards for shills. Issuance of shill funds shall have				
R	recorded and have the written approval of the	the written approval of the supervisor. 542.9(f)(1)	recorded and have the written approval of the			
	supervisor.		supervisor.			
			543.10(d)(1)			
			Returned shill funds must be recorded and			
1	verified by a supervisor.	sign-out form.	verified by a supervisor.			
			543.10(d)(2)			
	•	The replenishment of shill funds shall be	The replenishment of shill funds must be			
2			documented.			
		542.9(f)(3)	543.10(d)(3)			
	Chip(s) and token(s). Controls must be		Chip(s) and token(s). Controls must be			
	established and procedures implemented to		established and procedures implemented to			
С	ensure accountability of chip and token		ensure accountability of chip and token			
	inventory. Such controls must include, but are		inventory. Such controls must include, but are			
	not limited to, the following:		not limited to, the following: 543.18(g)			
1	Purchase;		Purchase; 543.18(g)(1)			
2	Receipt;		Receipt; 543.18(g)(2)			
3	Inventory;		Inventory; 543.18(g)(3)			

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games						
4	Storage; and		Storage; and 543.18(g)(4)				
5	Destruction.		Destruction. 543.18(g)(5)				
9.5	Standards for Reconciliation of Card Room						
	Bank						
	3	The amount of the main card room bank shall be	Standards for reconciliation of card room bank.				Standards for reconciliation of card room bank.
	1	counted, recorded, and reconciled on at least a per	Two agents—one of whom must be a				Two agents—one of whom must be a
	the table inventory at the opening and closing		supervisory agent—must independently count				supervisory agent—must independently count
Α	of the table and record the following	542.9(g)(1)	the main card room bank and table inventory at			Α	the main card room bank and table inventory
	information:		the end of each shift and record the following				at the <del>opening and closing</del> end of each shift
			information: 543.10(e)				the table and record the following
							information: 543.10(e)
	Date;		Date;				
1	Dutc,		543.10(e)(1)				
	Shift:		Shift;				
2			543.10(e)(2)				
	Table number;		Table number (if applicable);				Table number (if applicable); 543.10(e)(3)
3			543.10(e)(3)			3	
Λ	Amount by denomination;		Amount by denomination;				
			543.10(e)(4)				
5	Amount in total; and		Amount in total; and				
			543.10(e)(5)				
6	Signatures of both agents.		Signatures of both agents.				
	At least once per shift, the card banks that	At least once per shift, the table banks that were	543.10(e)(6) Standards for reconciliation of card room bank.				At least once per shift, the card banks that
	- I	I					1
	were opened during that shift shall be	opened during that shift shall be counted, recorded,	Two agents—one of whom must be a				were opened during that shift shall be
В	- I	and reconciled by a dealer or other person, and a supervisor, and shall be attested to by their signatures	supervisory agent—must independently count the table inventory at the opening and closing				counted, recorded, and reconciled by a dealer
	attested to by their signatures on the check-	on the check-out form.	of the table and record the following				or other person agent, and a supervisor, and
	out form.	542.9(a)(2)	information: 543.10(e)				shall be attested to by their signatures on the check-out form.
0.6	Standards for Promotional Progressive	342.5(d)(2)	information. 345.10(e)				Check-out form.
9.6	Pots and Pools						
	All funds contributed by players into the pools	Standards for promotional progressive pots and	Promotional progressive pots and pools. All				
	must be returned when won in accordance	<b>pools.</b> All funds contributed by players into the pools	funds contributed by players into the pools				
	with posted rules, and no commission or	shall be returned when won in accordance with the	must be returned when won in accordance with				
Α	administrative fee may be withheld.	posted rules with no commission or administrative fee	posted rules, and no commission or				
		withheld.	administrative fee may be withheld.				
		542.9(h)(1)	543.10(g)(1)				
	The payout may be in the form of personal		The control of the forms of control				
1			The payout may be in the form of personal				
1	property, such as a car.		property, such as a car. 543.10(g)(1)(i)				
	A combination of a promotion and		A combination of a promotion and progressive				
2	progressive pot may be offered.		pool may be offered. 543.10(g)(1)(ii)				
	progressive per may be energa.		peer may be emercal of 18.120(g)(12)(11)				
	The conditions for participating and rules	Rules governing promotional pools shall be	The conditions for participating in current card				
		conspicuously posted and designate:	game promotional progressive pots and/or				
		542.9(h)(2)	pools must be prominently displayed or				
	displayed in the card room or available in		available for patron review at the gaming				
	writing for patron review, and designated with		operation.				
_	the following:		543.10(g)(2)				
В							
			Rules governing current promotional pools				
			must be conspicuously posted in the card room				
			and/or available in writing for patron review.				
			The rules must designate:				
			543.10(g)(5)				
						l	

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games			<u>.</u>			
	The amount of funds to be contributed from	The amount of funds to be contributed from each pot;	The amount of funds to be contributed from				
1	each pot;	542.9(h)(2)(i)	each pot;				
			543.10(g)(5)(i)				
	As applicable, what type of hand it takes to	What type of hand it takes to win the pool (e.g., what	What type of hand it takes to win the pool;				
2	win the pool (i.e. what constitutes a "bad	constitutes a "bad beat");	543.10(g)(5)(ii)				
	beat");	542.9(h)(2)(ii)					
2	How the promotional funds will be paid out;	How the promotional funds will be paid out;	How the promotional funds will be paid out;				
3		542.9(h)(2)(iii)	543.10(g)(5)(iii)				
	How and when the contributed funds are	How/when the contributed funds are added to the	How/when the contributed funds are added to				
4	added to the jackpots; and,	jackpots; and 542.9(h)(2)(iv)	the pools; and				
	added to the jackpots, and,		543.10(q)(5)(iv)				
	Amount or percentage of funds allocated to	Amount/percentage of funds allocated to primary and	Amount/percentage of funds allocated to				
r	primary and secondary jackpots, if applicable.	secondary jackpots, if applicable.	primary and secondary pools, if applicable.				
3		542.9(h)(2)(v)	543.10(g)(5)(v)				
	Promotional pool contributions shall not be	Promotional pool contributions shall not be placed in	Promotional pool contributions must not be				Promotional pool contributions shall not be
	placed in or near the rake circle, in the drop	or near the rake circle, in the drop box, or commingled					placed in or near the rake circle, in the casino
6	box / financial instrument storage component,	with gaming revenue from card games or any other	box, or commingled with gaming revenue from				instrument storage container (CISC) drop box
C	or commingled with gaming revenue from	gambling game.	card games or any other gambling game.				/ financial instrument storage component, or
	card games or any other gambling game.	542.9(h)(3)	543.10(g)(6)				commingled with gaming revenue from card
							games or any other gambling game.
	The pool amount shall be conspicuously	The amount of the jackpot shall be conspicuously	The amount of the pools must be				The pool amount of the pools shall must be
	The state of the s	displayed in the card room.	conspicuously displayed in the card room.				conspicuously displayed in the card room and
		542.9(h)(4)	543.10(g)(7)				shall be updated to reflect the current pool
	·						amount.
D		At least once a day, the posted pool amount shall be	At least once each day that the game is offered,			D	
		updated to reflect the current pool amount.	the posted pool amount must be updated to				
		542.9(h)(5)	reflect the current pool amount.				
			543.10(g)(8)				
	At least once a day, increases to the posted	At least once a day, increases to the posted pool	At least once each day that the game is offered,				At least once a day, increases to the posted
	pool amount shall be reconciled to the cash	amount shall be reconciled to the cash previously	agents independent of the card room must				pool amount shall be reconciled to the cash
	li:	counted or received by the cage by personnel	reconcile the increases to the posted pool				previously counted or received by the cage by
Е	personnel independent of the card room.	independent of the card room.	amount to the cash previously counted or				personnel agents independent of the card
		542.9(h)(6)	received by the cage.				room.
		3 12.3 (1)(0)	543.10(g)(9)				
			·				
	All decreases to the pool must be properly	All decreases to the pool must be properly	All decreases to the pool must be properly				
F	9	documented, including a reason for the decrease.	documented, including a reason for the				
	decrease.	542.9(h)(7)	decrease.				
	Povents for Promotional Progressive Pools		543.10(q)(10)				
9.7	Payouts for Promotional Progressive Pools and/or Pots						
	Individual payouts for card game promotional		Individual payouts for card game promotional				
	progressive pots and/or pools that are Six		progressive pots and/or pools that are \$600 or				
	Hundred Dollars (\$600.00) or more must be		more must be documented at the time of the				
A	documented at the time of the payout to		payout to include the following:				
	include the following:		543.10(g)(3)				
1	Patron's name;		Patron's name;				
	Data of payout:		543.10(g)(3)(i)				
2	Date of payout;		Date of payout;				
	Dollar amount of payout and/or nature and		543.10(g)(3)(ii)  Dollar amount of payout and/or nature and				
3	dollar value of any non-cash payout;		dollar value of any non-cash payout;				
	asia. Value of any fron cash payout,		543.10(g)(3)(iii)				
	· I		10 .0.±0(g)(0)(m)		1	<u> </u>	I

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games						
	The signature of the agent completing the		The signature of the agent completing the				
4	transaction attesting to the disbursement of		transaction attesting to the disbursement of the				
	the payout; and		payout; and 543.10(g)(3)(iv)				
_	Name of contest/tournament.		Name of contest/tournament. 543.10(g)(3)(v)				
5	, , , , , , , , , , , , , , , , , , , ,		(9),(=),(-)				
	If the cash (or cash equivalent) payout for the		If the cash (or cash equivalent) payout for the				
	card game promotional progressive pot		card game promotional progressive pot and/or				
	and/or pool is less than Six Hundred Dollars		pool is less than \$600, documentation must be				
В	(\$600.00), documentation must be created to		created to support accountability of the bank				
	support accountability of the bank from which		from which the payout was made. 543.10(g)(4)				
	the payout was made.		Which the payout was made. 545.10(g)(4)				
	the payout was made.						
	Standards for Displaying Promotional						
9.8	Progressive Pools and Pots in Card Room						
	3						
	Promotional funds displayed in the card room	Promotional progressive pots and pools where	Promotional funds removed from the card				
	shall be placed in a locked container in plain	funds are displayed in the card room. Promotional	game must be placed in a locked container.				
		funds displayed in the card room shall be placed in a	543.10(g)(11)				
A	1	locked container in plain view of the public.					
		542.9(i)(1)					
	Persons authorized to transport the locked	Persons authorized to transport the locked container	Agents authorized to transport the locked				Persons Agents authorized to transport the
ь	container shall be precluded from having	shall be precluded from having access to the contents	container are precluded from having access to				locked container shall be precluded from
В	access to the content keys.	keys.	the contents keys. 543.10(g)(11)(i)				having access to the content keys.
	,	542.9(i)(2)					
	The contents keys shall be maintained by	The contents key shall be maintained by personnel	The contents key must be maintained by a				The contents keys shall be maintained by
	personnel independent of the card room and	independent of the card room. 542.9(i)(3)	department independent of the card room.				personnel an agent independent of the card
С	controlled in a manner as required in Section		543.10(g)(11)(ii)				room and controlled in a manner as required
	14 – Key and Access Controls.						in Section 14 – Key and Access Controls.
	,						
	At least once a day, the locked container shall	At least once a day, the locked container shall be	At least once a day, the locked container must				At least once a day, the locked container shall
	be removed by two persons, one of whom is	removed by two persons, one of whom is independent	be removed by two agents, one of whom is				be removed by two persons agents, one of
	independent of the card games department,	of the card games department, and transported	independent of the card games department,				whom is independent of the card games
	and transported directly to the cage or other	directly to the cage or other secure room to be	and transported directly to the cage or other				department, and transported directly to the
D	secure room to be counted, recorded, and	counted, recorded, and verified. 542.9(i)(4)	secure room to be counted, recorded, and				cage or other secure room to be counted,
	verified.		verified, prior to accepting the funds into cage				recorded, and verified.
			accountability.				
			543.10(g)(11)(iii)				
			S				
		The locked container shall then be returned to the					
E	·	card room where the posted pool amount shall be					
_	shall be updated to reflect the current pool	updated to reflect the current pool amount.					
	amount.	542.9(i)(5)					
	Standards for Promotional Progressive						
9.9	Pots and Pools Where Funds are						
	Maintained in the Cage						
		Promotional progressive pots and pools where	Promotional funds removed from the card				
	game shall be placed in a locked container.	funds are maintained in the cage. Promotional	game must be placed in a locked container.				
A		funds removed from the card game shall be placed in a	543.10(g)(11)				
		locked container.					
		542.9(j)(1)					
		Persons authorized to transport the locked container					Persons Agents authorized to transport the
В		shall be precluded from having access to the contents	container are precluded from having access to				locked container shall be precluded from
		keys.	the contents keys. 543.10(g)(11)(i)				having access to the content keys.
		542.9(j)(2)					

REF	CN TICS	542	543	Tribal - State Compact	Other Regs RE	Recommended Revisions
	Section 9 - Card Games					
	The contents key shall be maintained by	The contents key shall be maintained by personnel	The contents key must be maintained by a			The contents key shall be maintained by
	-	independent of the card room. 542.9(j)(3)	department independent of the card room.			personnel an agent independent of the card
С	controlled in a manner as required in Section		543.10(g)(11)(ii)			room and controlled in a manner as required
	14– Key and Access Controls.		5-13.10(g)(11)(ll)			in Section 14– Key and Access Controls.
	14 Rey und Access controls.					in section 14 Key and Access Controls.
	At least once a day, the locked container shall	At least once a day, the locked container shall be	At least once a day, the locked container must			At least once a day, the locked container shall
		removed by two persons, one of whom is independent	be removed by two agents, one of whom is			be removed by two persons agents, one of
	1	of the card games department, and transported	independent of the card games department,			whom is independent of the card games
		directly to the cage or other secure room to be	and transported directly to the cage or other			department, and transported directly to the
D		counted, recorded, and verified, prior to accepting the	secure room to be counted, recorded, and			cage or other secure room to be counted,
						3
	verified, prior to accepting the funds into cage	funds into cage accountability. 542.9(j)(4)	verified, prior to accepting the funds into cage			recorded, and verified, prior to accepting the
	accountability prior to accepting the funds		accountability.			funds into cage accountability prior to
	into cage accountability.		543.10(g)(11)(iii)			accepting the funds into cage accountability.
	The posted pool amount shall then be	The posted pool amount shall then be updated to				
E		reflect the current pool amount.				
-	appeared to reflect the current poor amount.	542.9(j)(5)				
		[342.3(j)(3)			9.1	Foreign Currency
		Foreign currency. The following standards shall				The following standards shall apply if foreign
1		apply if foreign currency is accepted in the pit:			A	currency is accepted in the pit:
		542.12(o)(1)				
		Foreign currency transactions shall be authorized by a				Foreign currency transactions shall be
						-
		pit supervisor/ boxperson who completes a foreign			1	authorized by a pit supervisor/ boxperson
		currency exchange form before the exchange for chips				who completes a foreign currency exchange
		or tokens;				form before the exchange for chips or tokens;
		Foreign currency exchange forms include the country				Foreign currency exchange forms include the
		of origin, total face value, amount of chips/token				country of origin, total face value, amount of
		extended (i.e., conversion amount), signature of				chips/token extended (i.e., conversion
		supervisor/boxperson, and the dealer completing the			2	amount), signature of supervisor/boxperson,
		transaction;				and the dealer completing the transaction;
		542.12(o)(1)(ii)				
		Foreign currency exchange forms and the foreign				Foreign currency exchange forms and the
		currency shall be inserted in the drop box by the				foreign currency shall be inserted in the CISC
		dealer; and			3	by the dealer; and
		542.12(o)(1)(iii)				
						Alt Control of
		Alternate procedures specific to the use of foreign				Alternate procedures specific to the use of
		valued gaming chips shall be developed by the Tribal				foreign valued gaming chips shall be
		gaming regulatory authority, or the gaming operation				developed by the CNGC, or the gaming
		as approved by the Tribal gaming regulatory authority.			4	operation as approved by the CNGC.
		542.12(o)(1)(iv)				
9 10	Variances				9.1	
3.10	The operation must establish, as approved by		Variances. The operation must establish, as		5.1	
	the CNGC, the threshold level at which a		approved by the TGRA, the threshold level at			
	variance must be reviewed to determine the		which a variance must be reviewed to			
	cause. Any such review must be documented		determine the cause. Any such review must be			
	_					
	and made available to CNGC upon request.		documented. 543.10(h)			
9.11	Other Standards	(2) [Reserved]				
	Points awarded for qualifying games shall					
Α	adhere to standards in Section 17 – Player					
	Tracking System as applicable.					
-			•			•

REF	CN TICS	542	543	Tribal - State Compact	Other Regs	REF	Recommended Revisions
	Section 9 - Card Games						
	The procedures for the collection of the card	<b>Standards for drop and count.</b> The procedures for					
	game drop/rake and the count thereof shall	the collection of the card game drop and the count					
В	comply with Section 12 – Drop and Count, as	thereof shall comply with §542.21, §542.31, or §542.41					
	applicable to the tier level of operation.	(as applicable).					
		542.9(b)					

Pari-Mutuel Racing	542	NIGC Class III Guidance	Off Track Wagering Compact		Recommended Revisions
	542.2	BULLETIN 2018-3			
				10.1	Definitions
	<b>Betting station means</b> The area designated	Betting station. The area designated in a pari-			Betting station – the area designated in a pari-
	in a pari-mutuel area that accepts wagers and	mutuel area that accepts wagers and pays		Α	mutuel area that accepts wagers and pays winning
	pays winning bets.	winning bets.			bets.
	Betting ticket means a printed, serially	Betting Ticket. A printed, serially numbered			Betting ticket – a printed, serially numbered form
	numbered form used to record the event	form used to record the event upon which a			used to record the event upon which a wager is
	upon which a wager is made, the amount and	wager is made, the amount and date of the		В	made, the amount and date of the wager, and
	date of the wager, and sometimes the line or	wager, and sometimes the line or spread			sometimes the line or spread (odds).
	spread (odds).	(odds).			
	<b>Breakage means</b> the difference between	Breakage. The difference between actual bet	Appendix A(A) <b>BREAKAGE</b> - the odd cents		Breakage – the odd cents over a multiple of ten
	actual bet amounts paid out by a racetrack to	amounts paid out by a racetrack to bettors	over a multiple of ten cents arising from the		cents arising from the computation of odds and
	bettors and amounts won due to bet	and amounts won due to bet payments being	computation of odds and payouts on amounts		payouts on amounts wagered on a race, which is
	payments being rounded up or down. For		wagered on a race which is part of interstate	C	part of an interstate common pari-mutuel pool.
	example, a winning bet that should pay \$4.25	bet that should pay \$4.25 may be actually	common pari-mutuel pool.		
		paid at \$4.20 due to rounding.	Common pan-mutuer pool.		
	rounding				
			Appendix A(A) <b>COMMISSION ON WAGERS</b> -		Commission on Wagers – an amount retained and
			an amount retained and not returned to	D	not returned to patrons from the total amount of
			patrons from the total amount of off-track pari-	D	off-track pari-mutuel wagers.
			mutuel wagers.		
	<b>Earned and unearned take means</b> race bets	Earned and unearned take. Race bets taken			Earned and unearned take – race bets taken on
	taken on present and future race events.	on present and future race events. Earned			present and future race events. Earned take means
	Earned take means bets received on current	take means bets received on current or		F	bets received on current or present events.
	or present events. Unearned take means bets	present events. Unearned take means bets		_	Unearned take means bets taken on future race
	taken on future race events.	taken on future race events.			events.
	<u>Future wagers</u> means bets on races to be	Future wagers. Bets on races to be run in the			Future wagers – bets on races to be run in the
	run in the future (e.g., Kentucky Derby).	future (e.g., Kentucky Derby).		F	future (e.g., Kentucky Derby).
			Appendix A(A) <b>GROSS REVENGE</b> - the total		Gross Revenge – the total commission on off-track
			commission on off-track pari-mutuel wagers,		pari-mutuel wagers, less the amount paid to the
			less the amount paid to track for the right to	G	track for the right to be part of the interstate
			be part of the interstate common pari-mutuel		common pari-mutuel pool ("re-track fee").
			pool ("re-track fee").		
	Hub means the person or entity that is	Hub. The person or entity that is licensed to	poor ( re-track ree ).		Hub – the person or entity that is licensed to
		provide the operator of a pari-mutuel			provide the operator of a pari-mutuel wagering
		wagering operation information related to			operation information related to horse racing that
		horse racing that is used to determine winners		Н	is used to determine winners of races or payoffs or
	_	of races or payoffs on wagers accepted by the		• •	wagers accepted by the pari-mutuel wagering
	. ,	1			
	wagers accepted by the pari-mutuel wagering	pan-mutuer wagering operation.			operation.
1	IODEIAHOH.	l .	1		

Pari-Mutuel Racing	542	NIGC Class III Guidance	Off Track Wagering Compact		Recommended Revisions
	542.2	BULLETIN 2018-3			
			Appendix A(A) <b>INTERSTATE COMMON PARI- MUTUEL POOL</b> - a pari-mutuel pool consisting of the pari- mutuel wagers placed at track, its interstate betting locations, other jurisdictions, and the off-track pari-mutuel wagers placed at Guest, and accepted into the off-track pari-mutuel system.	I	Interstate Common Pari-Mutuel Pool – A pari-mutuel pool consisting of the pari-mutuel wagers placed at a track, its interstate betting locations, other jurisdictions, and the off-track pari-mutuel wagers placed at authorized Cherokee gaming facilities, and accepted into the off-track pari-mutuel system.
			Appendix A(A) <b>LIVE AUDIO VISUAL SIGNAL</b> - the audio and visual transmission of a race, or series of races, as it occurs at track.	J	Live Audio Visual Signal – the audio and visual transmission of a race or series of races, as it occurs at a track.
			Appendix A(A) <b>MANUAL MERGE</b> - the process used in the event of a systems or communications failure by which the systems operator transmits to track-through telephone, telecopy, cellular or any other means of communication, the wagering information for a particular race or group of races, and the process by which track includes the off track pari-mutuel wagers into the interstate common pari- mutuel pool in such event	K	Manual Merge – the process used in the event of a systems or communications failure by which the systems operator transmits to a track through telephone, telecopy, cellular, or any other means of communication, the wagering information for a particular race or group of races, and the process by which a track includes the off-track pari-mutuel wagers into the interstate common pari-mutuel pool in such event.
			Appendix A(A) OFF-TRACK PARI-MUTUEL SYSTEM - a computerized system or component of a system that is used to transmit wagering data and wagering Information to and from a race track which offers interstate common pari-mutuel pools.  Section 4(m) "Pari-Mutuel system of		Off-Track Pari-Mutuel System – A computerized system or component of a system that is used to transmit wagering data and wagering information to and from a race track offering interstate common pari-mutuel pools.
			Wagering" means a form of wagering on the outcome of simulcast horse races in which those who wager, purchase tickets of various denominations on a horse or horses and all wagers for each race are pooled together and held by the gaming operation for distribution. The Pari-Mutuel system of wagering uses an electric totalizer or similar equipment which automatically registers the wagers made on each horse and prints and issues a ticket representing each wager.	L	

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	<b>Pari-mutuel wagering</b> means a system of wagering on horse races, jai-alai, greyhound, and harness racing, where the winners divide the total amount wagered, net of commissions and operating expenses, proportionate to the individual amount wagered.	Pari-mutuel wagering. A system of wagering on horse races, jai-alai, greyhound, and harness racing, where the winners divide the total amount wagered, net of commissions and operating expenses, proportionate to the individual amount wagered.	Appendix A(A) OFF-TRACK PARI-MUTUEL WAGER - a wager placed by a patron and accepted by guest on a race or races offered as part of an interstate common pari-mutuel pool offered by track, and accepted into the off-track pari-mutuel system.		Off-Track Pari-Mutuel Wager – A wager placed by a patron and accepted by an authorized Cherokee gaming facility on a race or races offered as part of an interstate common pari-mutuel pool offered by a track and accepted into the off-track pari-mutuel system.
			Section 4(j) "Off-Track Betting" means Pari-Mutuel betting on races into an interstate common Pari-Mutuel pool consisting of the Pari-Mutuel wagers placed at track(s), its intrastate betting locations, other jurisdictions, and the Pari-Mutuel wagers placed at the Nation Gaming Facilities authorized by this Compact.	М	
	<b>Post time means</b> the time when a parimutuel track stops accepting bets in accordance with rules and regulations of the applicable jurisdiction.	Post time. The time when a pari-mutuel track stops accepting bets in accordance with rules and regulations of the applicable jurisdiction.	Appendix A(A) <b>POST TIME</b> - for purposes of off-track pari-mutuel wagering is when the first entrant enters the gate.	N	Post Time – For purposes of off-track pari-mutuel wagering is when the first entrant enters the gate
	<b>SAM means</b> a screen-automated machine used to accept paru-mutuel wagers. SAM's also pay winning tickets in the form of a voucher, which is redeemable for cash.			0	SAM – a screen-automated machine used to accept pari-mutuel wagers. SAMs also pay winning tickets in the form of a voucher, which is redeemable for cash.
			Section 4(q) "Simulcast Horse Racing" means receiving and telecasting by telecommunication horse racing contests for view by patrons at various facilities simultaneous with the happening of said racing event.		
			Appendix A(A) <b>SYSTEMS OPERATOR OR OPERATOR OF A SYSTEM</b> - a person engaged in providing the off-track pari-mutuel system or services directly related to the reconciliation of the Interstate common parimutuel pool and transfers of funds between track and guest.	Р	Systems Operator or Operator of a System – A person engaged in providing the off-track parimutuel system or services directly related to the reconciliation of the interstate common parimutuel pool and transfers of funds between a track and an authorized Cherokee gaming facility.
	<u>Take</u> means the same as earned and unearned take.	Take. The same as earned and unearned take.		Q	Take – the same as earned and unearned take.

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				Appendix A(A) <b>TRACK</b> - an out-of-state		Track – an out-of-state facility licensed to operate
				facility licensed to operate horse or other	_	horse or other racing where pari-mutuel wagering
				racing where pari-mutuel wagering on races is	R	on races is conducted.
				conducted.		
				Appendix A(A) <b>WAGERING DATA</b> - the		Wagering Data – the information regarding results,
				information regarding results, actual payouts,		actual payouts, and the amount of pari-mutuel and
				and the amount of pari- mutuel and off-track	_	off-track pari-mutuel wagers accepted for each
				pari-mutuel wagers accepted for each race or	S	race or group of races in the interstate common
				group of races in the interstate common pari-		pari-mutuel pool.
				mutuel pool.		
				Appendix A(A) WAGERING INFORMATION -		Wagering Information – the amount of off-track
				the amount of off-track pari-mutuel wagers		pari-mutuel wagers accepted for each race or
				accepted for each race or group of races by	Т	group of races by an authorized Cherokee gaming
				quest.		facility.
10.1	Exemptions	(a) Exemptions		guest	10.2	Exemptions
A	The requirements of this section shall not	The requirements of this section shall not			10.2	Zacinptions
, ,	apply to gaming operations who house pari-	apply to gaming operations who house pari-				
	mutuel wagering operations conducted	mutuel wagering operations conducted				
	entirely by a state licensed simulcast service	entirely by a state licensed simulcast service				
	provider pursuant to an approved tribal-state	provider pursuant to an approved tribal-state				
	compact if:	compact if: 542.11(a)(1)				
		5 · · · · · · · · · · · · · · · · · · ·				
1	The simulcast service provider utilizes its own	The simulcast service provider utilizes its own				The simulcast service provider utilizes its own
	employees for all aspects of the pari-mutuel	employees for all aspects of the pari-mutuel			1	employees agents for all aspects of the pari-mutuel
	wagering operation;	wagering operation; 542.11(a)(1)(i)			1	wagering operation;
2	The gaming operation posts, in a location	The gaming operation posts, in a location				The gaming operation posts, in a location visible to
	·	visible to the public, that the simulcast service				the public, that the simulcast service provider and
	provider and its employees are wholly	provider and its employees are wholly			2	its employees agents are wholly responsible for the
	responsible for the conduct of pari-mutuel	responsible for the conduct of pari-mutuel				conduct of pari-mutuel wagering offered at that
	wagering offered at that location;	wagering offered at that location;				location;
3	The gaming operation receives a	542.11(a)(1)(ii) The gaming operation receives a				
J	1 5 5 .	predetermined fee from the simulcast service				
	provider; and,	provider; and 542.11(a)(1)(iii)				
В	In addition, the CNGC, or the gaming	In addition, the Tribal gaming regulatory				
-	operation as approved by CNGC, shall	authority, or the gaming operation as				
	establish and the gaming operation shall	approved by the Tribal gaming regulatory				
	comply with standards that ensure that the	authority, shall establish and the gaming				
	gaming operation receives, from the racetrack,				4	
	its contractually guaranteed percentage of the					
	handle.	from the racetrack, its contractually				
		guaranteed percentage of the handle.				
		542.11(a)(1)(iv)				
		a l				

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С	a state regulated racetrack as a simulcast service provider, but whose on-site pari-	<b>Gaming operations</b> that contract directly with a state regulated racetrack as a simulcast service provider, but whose on-site parimutuel operations are conducted wholly or in part by tribal gaming operation employees, shall not be required to comply with paragraphs (h)(5) thru (h)(9) of this section. 542.11(a)(2)			В	Gaming operations that contract directly with a state regulated racetrack as a simulcast service provider, but whose on-site pari-mutuel operations are conducted wholly or in part by tribal operation employees agents, shall not be required to comply with paragraphs 210.89(EC) through 210.89(IG) of theis section TICS.
1	•	If any standard contained within this section conflicts with state law, a tribal-state compact, or a contract, then the gaming operation shall document the basis for noncompliance and shall maintain such documentation for inspection by the Tribal gaming regulatory authority and the Commission. 542.11(a)(2)(i)				
2	In addition, the CNGC, or the gaming operation as approved by the CNGC, shall establish and the operation shall comply with standards that ensure that the operation receives, from the racetrack, its contractually guaranteed percentage of the handle.	In addition, the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall establish and the gaming operation shall comply with standards that ensure that the gaming operation receives, from the racetrack, its contractually guaranteed percentage of the handle. 542.11(a)(2)(ii)				In addition, the CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with standards that ensure that the gaming operation receives, from the racetrack, its contractually guaranteed percentage of the handle.
		3 12.11(G)(Z)(II)			10.3	General Standards
				9(b) <b>Barred Lists.</b> The Nation shall establish a list of persons barred from the Gaming Facility. The Nation shall use its best efforts to exclude persons with criminal histories or known gambling addiction from entry into its Gaming Facility and, upon request, send a copy of the barred list to the OSBI.	A	The gaming operation shall establish a list of persons barred from the gaming facility utilizing its best efforts to exclude persons with criminal histories or known gambling addiction. A copy of the list must be sent to the CNGC and the Oklahoma State Bureau of Investigation upon request.
					А	Security
				(Appendix A)(B)(1) The Nations's Gaming Facility will maintain appropriate security at all times.	1	The gaming operation will maintain approprioate security at all times.
				(Appendix A)(B)(2) A key employee will be on premises at all times wagering is conducted. The name of each key employee shall be maintained on file, and provided to the Cherokee Nation Gaming Commission.	a	A key employee will be on premises at all times wagering is conducted.

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				(Appendix A)(B)(2) A key employee will be on		The name of each key employee shall be
				premises at all times wagering is conducted. The		maintained on file and provided to the CNGC.
				name of each key employee shall be maintained on	b	
				file, and provided to the Cherokee Nation Gaming		
				Commission.		
					В	Logs
				9(a) The Nation shall maintain the following logs		The following logs shall be maintained as written
				as written or computerized records available for		or computerized records and shall be available for
				inspection by the OSBI and/or the OSF in	1	inspection by the Oklahome State Bureau of
				accordance with this compact.	1	Investigation and/or the Office of State Finance.
				9(a)(1) pay-out logs from all off-track wagering;	a	Pay-out logs from all off track wagering ; and
				and	a	
				9(a)(2) Maintenance logs in relation to all gaming		Maintenance logs to all gaming equipment
				equipment pertaining to off-track wagering	b	pertaining to off-track wagering.
					С	Posting of Rules
				9(d) <b>Rule Display.</b> Summaries of the house rules		Summaries of all house rules for off-track wagering
				for off-track wagering shall be visibly displayed in		shall be visibly displayed in each gaming facility
				each Gaming Facility. Complete rules shall be		with complete rules being available in pamphlet
				available in pamphlet form in each Gaming Facility.		form.
				available in pampinet form in each durning rucinty.		iom.
				(Appendix A)(H)(1) <b>Posting of rules</b>	1	
				All house rules shall be conspicuously displayed In		
				the Gaming Facility.		
				the daming racinty.		
						Any amendments or other modifications to the off-
					2	track wagering house rules must be authorized by
					<u> </u>	the CNGC prior to implementation.
				8(d) <b>Posting</b> Notices explaining dispute		
				resolution procedures for tort or wagering claims		
				shall be posted in prominent locations in each		
				Gaming Facility and the copies will be made		
				available upon request to the patron.		
				· · ·		
10.2	Computer Applications				10.4	Computer Applications System

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For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section as approved by the CNGC (or any standard contained in a tribal-state compact), will be acceptable.	Computer applications. For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the Tribal gaming regulatory authority, will be acceptable. 542.11(b)		Appendix A(C) <b>COMPUTER SYSTEM:</b>		For any computer applications utilized, alternate-documentation and/or procedures that provide at-least the level of control described by the standards in this section as approved by the CNGC (or any standard contained in a tribal-state-compact), will be acceptable.
				Α	The pari-mutuel wagering system used by authorized gaming facilities operations must:
			Appendix A (C)(¶1) The main processors consist of three DEC 4000 Series 90 central processing units operating in triplex or other suitable computer substitutes. These central processing units are located at a suitable location by the simulcast signal provider with telecommunication links to peripheral terminals located at the Nation's Gaming Facility or at some other suitable and securely equivalent location.	1	Be located at a suitable location by the simulcast signal provider with telecommunications links to peripheral terminals located at authorized gaming facilities through dedicated T-1 data connection or other communication system, as approved by the CNGC; an alternative communication system, as approved by the CNGC, must be available in the event the dedicated connection becomes inoperative.
			Appendix A (C)(12) The systems provide hard disk storage in the form of dual-disk disk drives of 2.1 gigabytes each, and 2.1 gigabytes of magnetic tape for backup data or some other storage of similar or greater capacity.	2	Provide sufficient hard disk storage with magnetic tape backup storage at a minimum of 2.1 gigabytes each or some other storage of similar or greater capacity, as approved by the CNGC;
			Appendix A (C)(¶3) Program source code shall not be available to Gaming Employees, or to Nation's data processing employees.  Appendix A (C)(¶4) Access to the main processors located at the source location is limited to authorized simulcast provider personnel or substitute entity personnel from the signal source locations.	3	Restrict access to program source code and source location hardware to authorized source location personnel or substitute entity personnel from the signal source locations; program source code shall not be available to gaming operation agents;
			Appendix A (C)(¶9) Nothing here shall prevent the Nation from providing an alternative computer system provided that the protection it maintains for the Nation and its patrons is similar to those provided by the described system and source location.	4	Nothing herein shall prevent the gaming operation from providing an alternative computer system provided the protection it maintains for the gaming operation and its patrons is similar to those provided by the requirements above

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			Appendix A (C)(16) Access to writer/cashier terminals will be restricted to writers/ cashiers. This restriction will be provided by requiring operator number and passwords to log on to the system.	В	Access to agent terminals will be restricted to agents by means of operator numbers and passwords necessary to log on to the system.
			Appendix A (C)(16) Writer/ cashier operator numbers will be issued by source location.	1	Agent/operator numbers shall be issued by the source location.
			Appendix A (C)(16) Passwords for writers/cashiers will remain confidential, known only by the writer/cashier.	2	Passwords for agents will remain confidential, which shall be known only to theagent and not shared with any other agent or supervisor.
			Appendix A (C)(16) Passwords for writers/ cashiers will be changed at least quarterly.	3	Agent passwords must be changed at least quarterly.
			Appendix A (C)(¶7) Supervisor and accounting personnel operator numbers and passwords will be issued by source location. These passwords will be changed as least quarterly.	4	Supervisor and Accounting personnel operator numbers and passwords shall be issued by the source location and must be changed at least quarterly.
			Appendix A (C)(18) A Gaming Employee or other employee, approved by the Cherokee Nation Gaming Commission may perform routine maintenance and service of the hardware components of the Gaming Facility's wagering and communication equipment.	С	A gaming operation agent or other agent, approved by the CNGC may perform routine maintenance and service of the hardware components of the gaming facility's wagering and communication equipment.
			Appendix A (C)(18) Source location-dispatched technician will perform all non-routine maintenance and service of the hardware components of the Gaming Facility's equipment.	D	A source location-dispatched technician shall perform all non-routine maintenance and service of the hardware components of the gaming facility's equipment.
			9(a) <b>Logs</b> . The Nation shall maintain the following logs as written or computerized records available for inspection by the OSBI and/or the OSF in accordance with this compact.  9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering	E	The gaming operation shall establish and maintain a log of all routine and non-routine maintenance, which shall include the following information, at a minimum:
			9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering	1	Date maintenance was performed;

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				9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering	2	Reason for maintenance;
				9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering	3	Description of maintenance performed;
				9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering	4	Printed name, signature, and employee number of the person performing maintenance.
				9(a)(2) Maintenance logs in relation to all gaming equipment pertaining to off-track wagering		Any service agreement entered into by the gaming operation with a third-party to provide simulcast services or provide pari-mutuel wagering/totalizer services must contain provisions sufficient to establish and maintain compliance with these internal controls, the rules and regulations of the CNGC, and any tribal-state compact to which the Nation is a party. All such service agreements must be on file with the CNGC, along with any subsequent amendments or modifications.
10.3	Betting Ticket and Equipment Standards	(c) <u>Betting ticket and equipment</u> standards.	(b) Betting ticket and equipment standards.		<del>10.3</del> 10.5	Betting Ticket Issuance and Equipment Standards Controls
А	All pari-mutuel wagers shall be transacted through the pari-mutuel satellite system. In case of computer failure between the parimutuel book and the hub, no tickets shall be manually written.	through the pari-mutuel satellite system. In case of computer failure between the pari-mutuel book and the hub, no tickets shall be	3(b)(1) All pari-mutuel wagers must be transacted through the pari-mutuel satellite system. In case of computer failure between the pari-mutuel book and the hub, no tickets must be manually written.			
В	Whenever a betting station is opened for wagering or turned over to a new writer/cashier, the writer/cashier shall sign on and the computer shall document gaming operation name (or identification number), station number, the writer/cashier identifier, and the date and time.	wagering or turned over to a new writer/cashier, the writer/cashier shall sign on and the computer shall document gaming operation name (or identification number),	the agent must sign on and the computer must document gaming operation name (or identification number), station number, the agent identifier, and the date and time.	(Appendix A)(D)(1) <b>OPENING/CLOSING PROCEDURES: Opening Procedure</b> Ticket writer/cashier receives his/her starting bank from the cage. Ticket writer/cashier verifies funds and enters the amount on a log. The writer/cashier signs the log. Upon completion of bank opening procedures, the writer/cashier will sign on to the system by inputting his operator code and password. The system will print a sign-on ticket that will contain the following information: "sign-on" designation, Gaming Center name, date, time, station number and operator number.		Whenever a betting station is opened for wagering or turned over to a new writer/cashier, Upon completion of bank opening procedures (the ticket agent must have received his/her bank from the cage, verified the funds, and entered bank amount on a log verifying by signature) the writer/cashier agent shall sign on by entering his/her operator code/number and password and the computer shall document and print a ticket that contains the sign-on designation, gaming operation name (or identification number), station number, the writer/cashier agent identifier (user name or operator number), and the date and time.
С	A betting ticket shall consist of at least two (2) parts:	_	3(b)(3) A betting ticket must consist of at least two parts:	(Appendix A)(E)(¶1) Betting tickets shall be in single part form.		A betting ticket shall consist of at least two (2) parts:

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1	An original, which shall be transacted and issued through a printer and given to the customer; and,	An original, which shall be transacted and	3(b)(3)(i) An original, which must be transacted and issued through a printer and given to the customer; and	(Appendix A)(E)(¶1) The original is given to the customer.		An original, which shall be transacted and issued through a printer and given to the customer patron; and,
2	A copy that shall be recorded concurrently with the generation of the original ticket either on paper or other storage media (e.g., tape or diskette).		3(b)(3)(ii) A copy that must be recorded concurrently with the generation of the original ticket.	(Appendix A)(E)(¶1) A second "copy" is retained internally within the computer system and is not accessible by pari-mutuel Gaming Facility personnel.		A copy that shall be recorded concurrently with the generation of the original ticket either on paper or other storage media (e.g., tape or diskette) and retained internally within the system and shall not be accessible by pari-mutuel agents.
				(Appendix A)(E)(¶2) The computer system prints a number on each ticket which identifies each writer station.	3	The computer system must print a number on each ticket which identifies each writer agent station.
				(Appendix A)(E)(¶3) Only one random numerical computer-assigned series per station shall be used at one time.	4	Only one random numerical computer-assigned series per station shall be used at one time.
				(Appendix A)(E)(¶4) Unused tickets will be stored in the pari-mutuel Gaming Facility storage room. These forms are serially numbered by the computer and do not require the "sensitive" forms inventory control procedures.	5	All unused tickets will be stored in the pari-mutuel storage room or other secure location approved by the CNGC. These forms are serially numbered by the computer and do not require the "sensitive" forms inventory control procedures.
				(Appendix A)(E)(16) All bets will be made in cash or chips and shall be evidenced by the issuance of a ticket upon acceptance of a wager.	D	All bets will be made in cash or chips and shall be evidenced by the issuance of a ticket upon acceptance of a wager.
				(Appendix A)(E)(¶5) The computer system will not allow a ticket to be voided after a race event is locked out.	E	The computer system will not allow a ticket to be voided after a race event post time.
				(Appendix A)(B)(3) The Gaming Facility will not accept wagers on credit.	F	The gaming operation will not accept wagers on credit.
D	Upon accepting a wager, the betting ticket that is created shall contain the following:		3(b)(4) Upon accepting a wager, the betting ticket that is created must contain the following:	(Appendix A)(E)(16) All bets will be made in cash or chips and shall be evidenced by the issuance of a ticket upon acceptance of a wager.	G	
1	A unique transaction identifier;	A unique transaction identifier; 542.11(c)(4)(i)	3(b)(4)(i) A unique transaction identifier;		1	A unique transaction identifier (e.g., barcode or similar unique identifier);
2	Gaming operation name (or identification number) and station number;	Gaming operation name (or identification number) and station number; 542.11(c)(4)(ii)	3(b)(4)(ii) Gaming operation name (or identification number) and station number;			
3	Race track, race number, horse identification or event identification, as applicable;	or event identification, as applicable;	3(b)(4)(iii) Race track, race number, horse identification or event identification, as applicable;			

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4	Type of bet(s), each bet amount, total number	Type of bet(s), each bet amount, total number	3(b)(4)(iv) Type of bet(s), each bet amount,			
	of bets, and total take; and,	of bets, and total take; and 542.11(c)(4)(iv)	total number of bets, and total take; and			
			·			
5	Date and time.	Date and time. 542.11(c)(4)(v)	3(b)(4)(v) Date and time.			
Е	All tickets shall be considered final at post	All tickets shall be considered final at post	3(b)(5) All tickets must be considered final at			All tickets shall be considered final at post time; no
	time.	time. 542.11(c)(5)	post time.		Н	portion or percentage of the value of a pari-mutuel
					П	wager will be refunded thereafter.
F	If a gaming operation voids a betting ticket	If a gaming operation voids a betting ticket	3(b)(6) If a gaming operation voids a betting			
	written prior to post time, it shall be	written prior to post time, it shall be	ticket written prior to post time, it must be		ī	
	immediately entered into the system.	immediately entered into the system.	immediately entered into the system.		1	
		542.11(c)(6)				
				(Appendix A)(E)(¶7) Tickets will not be written or		Tickets will not be written or voided after the
				voided after the outcome of an event is known.	J	outcome of an event is known.
-			12(1)(7) 5			
G	Future wagers shall be accepted and	Future wagers shall be accepted and	3(b)(7) Future wagers must be accepted and		IZ.	
	processed in the same manner as regular	processed in the same manner as regular	processed in the same manner as regular		K	
	wagers.	wagers. 542.11(c)(7)	wagers.			The consideration in the soul file and for some him
			3(b)(8) The gaming operation must be		L	The gaming operation is prohibited from the
			prohibited from the following;			following; Accepting from a patron less than full face value of
			3(b)(8)(i) Accepting from a patron less than		1	
			full face value of a pari-mutuel wager;		1	a pari-mutuel wager;
			3(b)(8)(ii) Agreeing to refund or rebate to a			Agreeing to refund or rebate to a patron any
			patron any portion or percentage of the value			portion or percentage of the value of a pari-mutuel
			of a pari-mutuel wager after post time; or		2	wager after post time; or
			3(b)(8)(iii) Increasing the payoff of, or pay a			Increasing the payoff of, or pay a bonus on, a
			bonus on, a winning pari-mutuel wager.		3	winning pari-mutuel wager.
						All relevant controls from Section 20 Information
					M	Technology will apply to this sub-section and to-
						sub-section 10.6.
					10.6	<b>Equipment Standards</b>
				(Appendix A (F)(1)) The screen activated machine		A kiosk (also known as a Screen Activated Machine
				(SAM) is a self-service betting machine which		(SAM)) is a self-service betting machine that allows
				allows customers to place wagers using a winning	Α	patrons to place wagers using a winning ticket or
				ticket or voucher generated by the system.	, ,	voucher generated by the system.

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				(Appendix A (F)(2)) The customer must insert a voucher or winning ticket for the SAM to accept a wager. Wagers will be made keying in the amount of the bet, the type of bet, and the horse or horses-selected. After the selection process is complete, the SAM will print a bet ticket. The SAM will print a voucher for the remaining balance, if any, owed. The voucher will contain the serial number, and SAM number. Once the wager is placed, the voucher can be used to place additional wagers for as cash.	1	The patron must insert a voucher or winning ticket for the kiosk to accept a wager. Patrons make wagers by keying in the amount of the bet, the type of bet, and the horse or horses selected. After the selection process is complete, the kiosk will print a bet ticket. The kiosk will print a voucher for any remaining balance owed. The voucher will contain the serial number and kiosk number. Once the wager is placed, the voucher can be used as cash to place additional wagers.
				(Appendix A (F)(3)) When a patron wishes to redeem a voucher, the writer/ cashier will insert it into the bar code reader. The computer will then generate a paid ticket and the writer/ cashier will pay the patron. All other procedures described concerning payouts on winning wagers will be compiled with as applicable.	2	When a patron wishes to redeem a voucher, the writer/cashier agent will validate the voucher by scanning the bar code or other unique identifier. The system will generate a paid ticket and the writer/cashier agent will pay the patron. All other procedures described concerning payouts of winning wagers will be complied with, as applicable
				(Appendix A (F)(4)) Outstanding vouchers will be listed on the Outsbook Voucher Report. Vouchers outstanding more than a specified number of days will be purged by the Systems Operator.	В	Outstanding vouchers will be listed on the Outsbook Voucher Report. Vouchers outstanding more than 120 days may be returned to revenue by the source location and purged in the system.
				(Appendix A (F)(5)) All winning tickets and vouchers inserted into the SAM will be deposited automatically into a locked box in the machine. On a daily basis, an accounting representative will check out the key to- the lock boxes to remove the tickets and vouchers. The key will be at a department Independent of the Pari-Mutuel Gaming Center and will require signing a log to access. After the accounting representative obtains the tickets and vouchers, he or she will immediately deliver them to accounting.	С	All winning tickets and vouchers inserted into the kiosk will be deposited automatically into a locked box in the kiosk. On a daily basis, an Accounting representative will follow all applicable key access policies to check out the key to access and remove the tickets and vouchers, which shall be immediately delivered to the appropriate Accounting department personnel.
				(Appendix A (F)(6)) Voids will not be allowed at a SAM. Additionally, winning tickets that require IRS withholding will not be paid at the SAM.	D	Voids will not be allowed at the kiosk. Additionally, winning tickets requiring IRS reporting will not be paid at the kiosk.
10.4	Payout Standards	(d) Payout standards.	(c) Payout standards.		10.7	Payout Standards

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A	Prior to making payment on a ticket, the writer/cashier shall input the ticket for verification and payment authorization.	writer/cashier shall input the ticket for		(Appendix A)(G)(¶1) <b>PAYMENT OF WINNING WAGERS:</b> Upon presentation of a winning ticket by a customer, the writer/ cashier will insert the ticket in to the bar code reader for verification and payment authorization.	Α	Prior to making payment on a ticket, the writer/cashier agent shall input insert the ticket into the bar code reader for verification and payment authorization.
				(Appendix A)(G)(¶1) Upon presentation of a winning ticket by a customer, the writer/cashier will insert the ticket in to the bar code reader for verification and payment authorization. The system will brand the ticket with the payout amount, writer/cashier's station number, and date. Information on all winning tickets paid will be retained by the system.	В	The system will brand the ticket with the payout amount, agent's station number, and date. Information on all winning tickets paid will be retained by the system.
				(Appendix A)(G)(¶2) Should the bar code reader fail to read a ticket, the writer/ cashier will manually enter the ticket number into the terminal. A payout ticket will then be printed which will include the following information: ticket number, "pay" indication, Gaming Facility name, pay amount, date, station number, and operator number.	С	If the bar code reader fails to read a ticket, the agent will manually enter the ticket number into the terminal. A payout ticket will then be printed which will include the following information:
					1	Gaming facility name (or identifiacation number);
					2	Ticket number;
					3	"Pay" indication;
					4	Payment amount;
					5	Date;
					6	Station number; and
					7	Operator number.
В	5. 7	authorizing payment on a ticket that has been previously paid, a voided ticket, a losing ticket,	authorizing payment on a ticket that has been previously paid, a voided ticket, a losing ticket, or an unissued ticket.	(Appendix A)(G)(13) The computer software is designed to prevent payment of a ticket that has been previously paid by the system, voided by the system, a losing ticket, or a ticket not issued by the system.	D	The computer system shall be incapable of authorizing payment on a ticket that has been previously paid, a voided ticket, a losing ticket, or an unissued a ticket not issued by the system.
					Е	Payouts/payoffs over ten thousand dollars (\$10,000) may be delayed for up to twenty-four (24) hours after the next banking day.

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			(Appendix A)(G)(¶5) For winnings requiring the completion of a form W2G, the computer system will preclude a writer/ cashier from making payment until the patron's social security number is entered. Once the social security number is entered, the computer will compute the amount of withholding and the amount of customer payment. The system will not pay a winning ticket, which requires IRS withholding, unless the customer provides his/her social security number at the time of payment.	F	For winnings subject to IRS reporting requirements the system shall preclude a agent from making payment until all necessary information is obtained from the patron. The enterprise shall develop policies and procedures, subject to CNGC approval, that provide compliance with IRS reporting requirements.
			(Appendix A)(G)(¶5) The system will calculate the withholding amount and the net amount due to the customer, which will both be printed on the ticket. This will alert the writer/ cashier and the supervisor to complete the required IRS forms. Persons who do not have social security numbers may receive winnings from the manager after complying with federal tax requirements.	G	The system will calculate the patron's withholding and net amounts both of which will be printed on the ticket. This will alert the writer/ cashier and the supervisor to complete the required IRS forms. Patrons who do not have social security numbers may receive winnings from the manager after complying with federal tax requirements.
			(Appendix A)(I) Unpaid winners remain on the computer system for a minimum of 120 days after the conclusion of a racing meet. Following the 120 day period, the unpaid winners are brought back into revenue by the source location.	н	Record of unpaid winners must remain on the system for a minimum of 120 days after the conclusion of a racing meet. Following the 120 day period, the unpaid winners may be brought back into revenue by the source location.
			Appendix A (J) Upon notification by a patron that a winning ticket has been lose, stolen, or otherwise not available for persentation, the following procedures must be followed:	I	Upon notification by a patron that a winning ticket has been lost, stolen, or otherwise not available for persentation, the following procedures must be followed:
			Appendix A (J)(1) The patron must report the loss of the ticket no later than the third day following the day the race was completed, unless the patron can show circumstances where this is not possible, or unless approved by gaming facility management.	1	The patron must report the loss of the ticket no later than the third day following the day the race was completed, unless the patron can show circumstances where this is not possible, or unless approved by gaming-facility operation management.
			Appendix A (J)(2) A lost ticket report will be prepared by the gaming facility form information supplied by the patron and must contain the following information:	2	A lost ticket report will be prepared by the gaming facility operation from information supplied by the patron and must contain the following information:

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			Appendix A (J)(2)(a) Name, address and telephone number of the patron	a	Name, address and telephone number of the patron;
			Appendix A (J)(2)(b) Date/time the ticket was purchased;	b	Date/time the ticket was purchased;
			Appendix A (J)(2)(c) Amount /type of wager;	С	Amount /type of wager;
			Appendix A (J)(2)(d) Horse/greyhound betting numbers;	d	Horse/greyhound betting numbers;
			Appendix A (J)(2)(e) Ticket number (if known by patron);	е	Ticket number (if known by patron);
			Appendix A (J)(2)(f) Signature of patron	f	Signature of patron;
			Appendix A (J)(2)(g) Signature of report preparer	g	Signature of report preparer; and
			Appendix A (J)(2)(h) Signature of Gaming Facility Manager/Supervisor	h	Signature of gaming facility manager/supervisor.
			Appendix A (J)(3) The lost ticket report will be delivered to the controller who will instruct an accounting clerk to research the unpaid ticket tile.	3	The lost ticket report will be delivered to the controller who will instruct an accounting agent to research the unpaid ticket tile.
			Appendix A (J)(3)(a) If an unpaid ticket that matches the information on the lost ticket report cannot be located, the lost ticket report will be returned to the Gaming Facility Manager with instructions that no payment can-be made	a	If an unpaid ticket that matches the information on the lost ticket report cannot be located, the lost ticket report will be returned to the gaming operation manager with instructions that no payment can-be made.
			Appendix A (J)(3)(b) After the ticket is held for this one hundred twenty (120) day period, the patron may be paid. The controller reviews all of the lost ticket claim support paperwork prior to signing the check to be mailed to the customer.	b	If an unpaid ticket is found that matches the lost ticket report, the unpaid ticket will be "locked" in the computer system to prevent payment to other than the claimant for the holding period of one hundred twenty (120) days after the conclusion of the racing meet on which the wager was placed.
			Appendix A (J)(4) After the ticket is held for this one hundred twenty (120) day period, the patron may be paid. The controller reviews all of the lost ticket claim support paperwork prior to signing the check to be mailed to the customer.	4	After the ticket is held for this one hundred twenty (120) day period, the patron may be paid. The controller reviews all of the lost ticket claim support paperwork prior to signing the check to be mailed to the patron.
			Appendix A (J)(5) If the ticket is presented for payment within this one hundred twenty (120) day period by other than the patron represented on the lost ticket report; or if a dispute arises from the foregoing procedures, it will be the Gaming Facility's responsibility to resolve such disputes.	5	If the ticket is presented for payment within this one hundred twenty (120) day period by other than the patron represented on the lost ticket report; or if a dispute arises from the foregoing procedures, it will be the gaming Facility's operation's responsibility to resolve such disputes.

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			MAIL PAYMENTS: (Appendix A)(K)	J	For mail payments, the following procedures shall apply:
			(Appendix A)(K)(¶1) Only original wagered tickets are acceptable for mail payments.	1	Only original wagered tickets are acceptable for mail payments.
			(Appendix A)(K)(¶2) All mail payment requests are opened and logged by personnel independent of the Gaming Facility. A copy of the log is retained by the accounting department for auditing mail tickets paid. The mailed ticket is forwarded directly to the Gaming Facility Manager's office, where it is then entered into a writer/ cashier's terminal for unpaid ticket update to indicate that the ticket is no longer outstanding.	2	All mail payment requests are to be sent to, opened and logged by personnel independent of the pari-mutuel wagering location. A copy of the log shall be retained by the Accounting department for auditing mail tickets paid.
			(Appendix A)(K)(¶2) All mail payment requests are opened and logged by personnel independent of the Gaming Facility. A copy of the log is retained by the accounting department for auditing mail tickets paid. The mailed ticket is forwarded directly to the Gaming Facility Manager's office, where it is then entered into a writer/ cashier's terminal for unpaid ticket update to indicate that the ticket is no longer outstanding.	3	The mailed ticket shall be forwarded directly to the gaming facility manager where it is entered into an agent terminal for unpaid ticket update to indicate that the ticket is no longer outstanding.
			(Appendix A)(K)(¶3) A request for disbursement and the approved ticket are forwarded to the controller for payment.	4	A request for disbursement and the approved ticket shall be forwarded to the controller for payment.
			(Appendix A)(K)(¶4) Only the controller or a designate is authorized to approve mail payments.	5	Mail payments may be authorized only by the controller or their designee.
			(Appendix A)(H)(2) Refunds. All bets received on any entry which does not start or on a race which is canceled or postponed shall be refunded on the basis of the refund policy in effect at the track.	K	Refunds. All bets received on any entry which does not start or on a race which is canceled or postponed shall be refunded on the basis of the refund policy in effect at the track.
			(Appendix A)(H)(4) Cancellation of track pool. In the event that a pari-mutuel pool is canceled by the track, the corresponding off-track betting pari- mutuel pool shall be refunded.	L	Cancellation of track pool. In the event that a parimutuel pool is canceled by the track, the corresponding off-track betting pari-mutuel pool shall be refunded.

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				(Appendix A)(H)(5) The Gaming Facility bears no responsibility with respect to the actual running of any race or races upon which it accepts bets. In all cases, the off-track betting pari-mutuel pool distribution shall be based upon the order of finish posted at the track as 'official". The determination of the Judges, stewards or other appropriate officials at the track shall be conclusive in determining the payoffs of the Gaming Facility.		The off-track wagering pari-mutuel pool distributions shall be based upon the order of finish posted at the track as 'official". The determination of the Judges, stewards or other appropriate officials at the track shall be conclusive in determining the payoffs of the gaming operation.
				(Appendix A)(H)(6) In the event an error in calculation of payment occurs in a pool which is the result of the combination of the track pool and the off-track betting pool, the rules in effect at the track governing the disposition of such error shall prevail.		In the event an error in calculation of payment occurs in a pool which is the result of the combination of the track pool and the off-track betting pool, the rules in effect at the track governing the disposition of such error shall prevail.
				(Appendix A)(H)(3) The Gaming Facility reserves the right to refuse to accept bets on a particular entry or entries or in any or all pari-mutuel pools for what it deems good and sufficient reason.	0	The gaming operation reserves the right to refuse to accept bets on a particular entry or entries or in any or all pari-mutuel pools for what it deems good and sufficient reason.
	Checkout Standards	(e) <u>Checkout standards.</u>			10.8	Checkout Standards Closing Procedures
	Whenever the betting station is closed or the writer/cashier is replaced, the writer/cashier shall sign off and the computer shall document the gaming operation name (or identification number), station number, the writer/cashier identifier, the date and time, and cash balance.	the writer/cashier is replaced, the writer/cashier shall sign off and the computer shall document the gaming operation name (or identification number), station number, the	or the agent is replaced, the agent must sign off and the computer must document the gaming operation name (or identification number), station number, the agent identifier, the date and time, and cash balance.	(Appendix A)(D)(2) <b>Closing Procedures</b> When the writer/ cashier doses his/her pari-mutuel station, a sign-off ticket and a summary ticket will be printed by the terminal. The sign-off ticket will contain the following information: sign-off designation, Gaming Facility name, date, time, station number and operator number.		Whenever the betting station is closed or the writer/cashier agent is replaced, the agent must sign off and the computer system must document and print a sign-off ticket that contains the sign-off designation, gaming operation name (or identification number), station number, the writer/cashier agent identifier (user name or operator number), the date, and time, and cash balance.
В	For each writer/cashier station a summary report shall be completed at the conclusion of each shift including:	report shall be completed at the conclusion of	3(d)(2) For each agent station a summary report must be completed at the conclusion of each shift including:	(Appendix A)(D)(2) The summary ticket will contain the following information: Gaming Facility name, date, time, station number, operator number, take (sales), voids (cancels), paid (cash), the IRS withholding amount, and beginning bank (draw).		For each writer/cashier agent station a summary report/ticket shall be printed by the terminal completed at the conclusion of each shift and shall including contain the gaming operation name, date, time, station number, operator number, take (sales), voids (cancels), paid (cash), the IRS withholding amount, and beginning bank (draw).

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1	Computation of cash turned in for the shift, and,	Computation of cash turned in for the shift; and 542.11(e)(2)(i)	3(d)(2)(i) Computation of cash turned in for the shift; and	(Appendix A)(D)(2) Information on cash turn-ins (cash balance) will only be available to-the book supervisor via password access.	С	Computation of cash turned in for the shift, and, Information on cash turned in (cash balance) will only be available to the book supervisor via password access.
2	Signature of two (2) employees who have verified the cash turned in for the shift. Unverified transfers of cash and/or cash equivalents are prohibited.	Signature of two employees who have verified the cash turned in for the shift. Unverified transfers of cash and/ or cash equivalents are prohibited. (Revised August 12, 2005) 542.11(e)(2)(ii)	3(d)(2)(ii) Signature of two agents who have independently verified the cash turned in for the shift. Unverified transfers of cash and/or cash equivalents are prohibited.	(Appendix A)(D)(2) The cash drawer is then counted by the cashier/writer and the shift supervisor. Both sign the count sheet. The computer terminal is accessed to determine the writer's total cash balance. This is compared to the count sheet and variations are investigated.	D	The cash drawer must be counted by the closing agent and the shift supervisor evidenced by signing the count sheet. Signature. of two (2) employees who have verified the cash turned in fo the shift. Unverified transfers of cash and/or cash equivalents are prohibited.
				(Appendix A)(D)(2)This is compared to the count sheet and variations are investigated.  (Appendix A)(D)(2)(12) Once verified, a manual cash-in slip is created and signed by both the writer/ cashier and the shift supervisor, the writer/ cashier will proceed to the slot cage and will turn in their funds	E	Once verified, a manual cash-in slip is created and signed by both the closing agent and the shift supervisor, the closing agent will transfer the funds to the cage/vault for accountability. All variances must be documented and investigated.
10.6	Employee Wagering	(f) Employee wagering.		THEIR TITLES	10.9	
	Pari-mutuel employees shall be prohibited from wagering on race events while on duty, including during break periods.	Pari-mutuel employees shall be prohibited from wagering on race events while on duty, including during break periods. 542.11(f)		(Appendix A)(B)(4) <b>GENERAL CONTROLS:</b> Gaming Facility employees are prohibited from wagering on events while on duty.		Pari-mutuel employees- agents shall be prohibited from wagering on race events while on duty, including during break periods.
10.7	Computer Report Standards	(g) <u>Computer report standards.</u>	3(e) Computer reports standards.		10.10	Computer Reports Standards
А	Adequate documentation of all pertinent parimutuel information shall be generated by the computer system.	-	3(e)(1) Adequate documentation of all pertinent pari-mutuel information must be generated by the computer system for each day's operation.			
В	This documentation shall be restricted to authorized personnel.	<b>This documentation shall</b> be restricted to authorized personnel. 542.11(g)(2)	3(e)(2) This documentation must be restricted to authorized agents.			
C 1		<b>The documentation shall</b> be created for each day's operation and shall include, but is not limited to: 542.11(q)(3)	<u> </u>			
2	Date/time of transfer;	Date/time of transaction; 542.11(g)(3)(ii)	3(e)(3)(ii) Date/time of transaction;			
3	Type of wager;	Type of wager; 542.11(g)(3)(iii)	3(e)(3)(iii) Type of wager;			
4	Animal identification or event identification;	Animal identification or event identification; 542.11(g)(3)(iv)	3(e)(3)(iv) Animal identification or event identification;			
5	Amount of wagers (by ticket, writer/screen activated machine (SAM), track/event, and total);	Amount of wagers (by ticket, writer/SAM, track/event, and total); 542.11(g)(3)(v)	3(e)(3)(v) Amount of wagers (by ticket, agent/kiosk, track/event, and total);			Amount of wagers (by ticket, agent writer/screen- activated machine (SAM)kiosk, track/event, and total);
6	Amount of payouts (by ticket, writer/SAM, track/event, and total);	Amount of payouts (by ticket, writer/SAM, track/event, and total); 542.11(g)(3)(vi)	3(e)(3)(vi) Amount of payouts (by ticket, agent/kiosk, track/event, and total);	(Appendix A)(G)(¶1) Information on all winning tickets paid will be retained by the system.		Amount of wagers (by ticket, agent writer/screen- activated machine (SAM)kiosk, track/event, and total);

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Tickets refunded (by ticket, agent writer, track/event, and total);
track/event, and total),
Voucher sales/payments (by ticket, agent
writer/SAMkiosk, and track/event);
Voids (by ticket, agent writer, and total);
<del>                                      </del>
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<del>                                     </del>
The pari-mutuel race auditor shall have the ability
to generate the following system reports each day:
<u>y</u>
ze
ı
otal otal
A Daily #Reconciliation #Report that summarizes
totals by track/event, including write, the day's
winning ticket total, total commission and
ze breakage due the gaming operation, and net funds
transferred to or from the operation's bank
account;
will An eException rReport that contains a listing of all
system functions and overrides not involved in the
actual writing or cashing of tickets, including sign-
on/off, voids, and manually input paid tickets; and,
zii, zii, ziias, ana manaanj mpat para tickets, ana,
d
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3	A purged ticket report that contains a listing of the unique transaction identifier(s), description, ticket cost and value, and date purged.	A purged ticket report that contains a listing of the unique transaction identifier(s), description, ticket cost and value, and date purged. 542.11(g)(4)(iii)	3(e)(4)(iii) A purged ticket report that contains a listing of the unique transaction identifier(s), description, ticket cost and value, and date purged.			A pPurged tTicket rReport that contains a listing of the unique transaction identifier(s), description, ticket cost and value, and date purged.
				Recap Report - This report will, contain information by track and total information regarding write, refunds, payouts, outs, payments on outs, and federal tax withholding for-each track will also be eluded. Additionally, information regarding SAM voucher activity will be included. This report will provide daily amounts.	4	A Recap Report that provides daily amounts and contains information by track and total information regarding write, refunds, payouts, outs, payments on outs, and federal tax withholding for-each track. The report will also contain information regarding kiosk voucher activity.
				Window Activity Report - This report will summarize for each window the following information: Sales, cash outs, cancels, draws, returns, vouchers sold, vouchers cashed, over/short.	5	A Window Activity Report that summarizes the following information for each window: sales, cash outs, cancels, draws, returns, vouchers sold, vouchers cashed, and over/ short.
				Teller Balance Report - This report will summarize daily activity by track and writer/ cashier, and SAM terminals. Specifically, the report will contain the following: tickets sold, tickets cashed, tickets canceled, draws, returns, computed cash turn-in, actual turn-in, and over/short.	6	A Teller Balance Report that summarizes daily activity by track and writer/ cashier, and kiosks. The report will contain the following information: tickets sold, tickets cashed, tickets canceled, draws, returns, computed cash turn-in, actual turn-in, and over/short.
				Teller Details Report - This report will summarize teller activity. Specifically, for each teller the report will contain tickets sold, tickets cashed, tickets canceled, tickets refunded, W-2G withholdings, funds returned, draws and over/ short.	7	A Teller Details Report that summarizes teller activity. For each teller the report will contain tickets sold, tickets cashed, tickets canceled, tickets refunded, IRS withholdings, funds returned, draws and over/short.
				Session Sales Summary - This report will summarize sales activity for each type of wager placed, for each race run, and for each track opened. Additionally, total sales will be provided. Specific information included will be sales, cancels, sales from previous sessions, refunds, and net	8	A Session Sales Summary that summarizes sales activity for each type of wager placed, for each race run, and for each track opened. Additionally, total sales will be provided. Specific information included will be sales, cancels, sales from previous sessions, refunds, and net sales.
				Cashed Tickets Report - This report will list all paid winning tickets by track and race. This report will include the ticket number, date, tickets written, horse or greyhound selection and type of bet made amount of bet or bets, total take, and pay amount. The report will also include IRS withholdings, if applicable.	9	A Cashed Tickets Report that lists all paid winning tickets by track and race. This report will include the ticket number, date, tickets written, horse or greyhound selection and type of bet made, amount of bet(s), total take, and pay amount. The report will also include IRS withholdings, if applicable.

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			Canceled Tickets Report - This report will list all tickets that were canceled for the day. Specific information will include ticket serial number, sale window, cancellation window, and amount.	10	A Canceled Tickets Report will list all tickets that were canceled for the day and will include ticket serial number, sale window, cancellation window, and amount.
			Refunded Tickets Report - This report will list all tickets refunded for the day. Specifically, this report will include ticket serial number, ticket description, and amount.	11	A Refunded Tickets Report that lists all tickets refunded for the day and includes ticket serial number, ticket description, and amount.
			SAM Activity Report - This report will contain a summary of Screen Activated Machines (SAM) activity. Specifically, this report will include the SAM number, ticket sales, ticket cash outs, voucher sales, and voucher cash outs.	12	A Kiosk Activity Report that contains a summary of kiosk activity including the kiosk number, ticket sales, ticket cash outs, voucher sales, and voucher cash outs.
			Cashed Voucher Report - This report will contain a detailed listing of all vouchers cashed for the day. Specifically, this report will contain the ticket serial number, the window(s) at which the voucher was sold and cashed, and the amount of the voucher cashed.	13	A Cashed Voucher Report that contains a detailed listing of all vouchers cashed for the day and includes the ticket serial number, the window(s) at which the voucher was sold and cashed, and the amount of the voucher cashed.
			IRS Tax Report-Cashed - This report will contain a detailed listing of all tickets cashed that were subject to federal withholding. This report will include the customer's social security number, ticket serial number, ticket conditions, race date, amount of payout, withholding amount, net payout, cashing and selling window(s), and teller identification.	14	An IRS Tax Report Cashed Report that contains a detailed listing of all tickets cashed that were subject to federal withholding which includes the patron's social security number, ticket serial number, ticket conditions, race date, amount of payout, withholding amount, net payout, cashing and selling window(s), and teller identification.
			Future Tickets Report - This report will contain a detailed listing of all tickets bet on events occurring subsequent to the current day. This report will include ticket serial number, window where the ticket was bet, cost, amount, type of bet, race number, and horses chosen.	15	A Future Tickets Report that contains a detailed listing of all tickets bet on events occurring subsequent to the current day. The report will include the ticket serial number, window where the bet was placed, cost, amount, type of bet, race number, and horse(s) chosen.
			Outsbook Tickets Report - This report will contain a listing by window, race, track and in summary of winning tickets which remain unpaid. Specifically, this report will include ticket number, window, pay amount, and IRS Withholding (if applicable).	16	An Outsbook Tickets Report that contains a listing by window, race, track and a summary of all unpaid winning tickets that will include the ticket number, window, pay amount, and IRS Withholding (if applicable).
			Public Results Information Report - This report will contain race results and prices paid.	17	A Public Results Information Report that contains race results and prices paid.

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				Transaction Search Report - This report will contain a listing of all tickets and vouchers written and paid per station. Also the report contains cancelled tickets.	18	A Transaction Search Report that contains a listing of all tickets and vouchers written and paid per station, including canceled tickets.
					10.11	Variances
			3(h) Variance. The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.			The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.
					10.12	Other Standards
					Α	All relevant controls in Section 12 Drop and Count shall apply.
					В	All relevant controls in Section 14 Key and Access shall apply.
			3(f) All relevant controls from § 11, Information and Technology will apply.		С	All relevent controls in Section 20 Information Technology shall apply.
					D	All relevant controls in Section 21 Auditing Revenue shall apply.
					Е	All relevant controls in Section 22 Surveillance shall apply.
10.8	Accounting and Auditing Functions	(h) Accounting and auditing funtions.			<del>10.8</del>	Accounting and Auditing Functions
	A gaming operation shall perform the following accounting and auditing functions:	A gaming operation shall perform the following accounting and auditing functions: 542.11(h)				A gaming operation shall perform the following accounting and auditing functions:
А	l ·	<b>The pari-mutuel audit shall</b> be conducted by personnel independent of the pari-mutuel operation. 542.11(h)(1)				The pari-mutuel audit shall be conducted by personnel independent of the pari-mutuel operation.
В	accounting and auditing procedures.	<b>Documentation shall</b> be maintained evidencing the performance of all pari-mutuel accounting and auditing procedures. 542.11(h)(2)				Documentation shall be maintained evidencing the performance of all pari-mutuel accounting and auditing procedures.
С	from the systems operator on a weekly basis.	handle, commission, and breakage for each day's play and recalculate the net amount due	13(d)(2)(i) Review handle, commission, and breakage for each day's play and recalculate the net amount due to or from the systems operator on a weekly basis.			An accounting employee shall review handle, commission, and breakage for each day's play and recalculate the net amount due to or from the systems operator on a weekly basis.
D	cash/cash equivalents turned in to the system's summary report for each cashier's drawer (Beginning balance, (+) fills (draws), (+) net write (sold less voids), (-) payouts (net of IRS withholding), (-) cashbacks (paids), (=)	system's summary report for each cashier's drawer (Beginning balance, (+) fills (draws), (+) net write (sold less voids), (-) payouts (net of IRS withholding), (-) cashbacks (paids), (=)	13(d)(2)(ii) Verify actual cash/cash equivalents turned in daily to the system's summary report for each cashier's drawer (Beginning balance, ( + ) fills (draws), ( + ) net write (sold less voids), (–) payouts (net of IRS withholding), (–) cashbacks (paids), (=) cash turn-in).			The accounting employee shall verify actual-cash/cash equivalents turned in to the system's-summary report for each cashier's drawer-(Beginning balance, (+) fills (draws), (+) net write-(sold less voids), (-) payouts (net of IRSwithholding), (-) cashbacks (paids), (-) cash turnin).

	Pari-Mutuel Racing	542	NIGC Class III Guidance	Off Track Wagering Compact	Recommended Revisions
		542.2	BULLETIN 2018-3	on many company	
E	An accounting employee shall produce a		13(d)(2)(iii) Produce a gross revenue recap		An accounting employee shall produce a gross-
			report to calculate gross revenue for each		revenue recap report to calculate gross revenue for
			day's play and for a month-to-date basis,		each day's play and for a month-to-date basis,
		1	including the following totals:		including the following totals:
	5	542.11(h)(5)	including the following totals.		including the following totals.
1	Commission;	Commission; 542.11(h)(5)(i)	13(d)(2)(iii)(A) Commission;		Commission;
	Positive breakage;	Positive breakage; 542.11(h)(5)(ii)	13(d)(2)(iii)(B) Positive breakage;		Positive breakage;
3	Negative breakage;	Negative breakage; 542.11(h)(5)(iii)	13(d)(2)(iii)(C) Negative breakage;		Negative breakage;
4	Track/event fees;	Track/event fees; 542.11(h)(5)(iv)	13(d)(2)(iii)(D) Track/event fees;		Track/event fees;
5	Track/event fee rebates; and,		13(d)(2)(iii)(E) Track/event fee rebates; and		Track/event fee rebates; and,
	· · ·		, , , , , , , , , , , , , , , , , , , ,		
6	Purged tickets.	Purged tickets. 542.11(h)(5)(vi)	13(d)(2)(iii)(F) Purged tickets.		Purged tickets.
F .	All winning tickets and vouchers shall be	All winning tickets and vouchers shall be	13(d)(2)(iv) All winning tickets and vouchers		All winning tickets and vouchers shall be physically
	physically removed from the SAM's for each	physically removed from the SAM's for each	shall be physically removed from the kiosk for		removed from the SAM's for each day's play.
	day's play.	l	each day's play.		
		<b>In the event</b> a SAM does not balance for a	13(d)(2)(v) In the event a kiosk does not		In the event a SAM does not balance for a day's
			balance for a day's play, the auditor shall		play, the auditor shall perform the following
		1	perform the following procedures:		procedures:
	ionowing procedures.	Tollowing procedures. 342.11(II)(7)	perform the following procedures.		<del>procedures.</del>
1	Foot the winning tickets and vouchers	Foot the winning tickets and vouchers	13(d)(2)(v)(A) Foot the winning tickets and		Foot the winning tickets and vouchers deposited
	•		vouchers deposited and trace to the totals of		and trace to the totals of SAM activity produced by
	activity produced by the system;	activity produced by the system;	kiosk activity produced by the system;		the system;
		542.11(h)(7)(i)	γ ,		
2			13(d)(2)(v)(B) Foot the listing of cashed		Foot the listing of cashed vouchers and trace to-
	to the totals produced by the system;	to the totals produced by the system;	vouchers and trace to the totals produced by		the totals produced by the system;
		542.11(h)(7)(ii)	the system;		
3	Review all exceptions for propriety of	Review all exceptions for propriety of	13(d)(2)(v)(C) Review all exceptions for		Review all exceptions for propriety of transactions
	transactions and unusual occurrences;	transactions and unusual occurrences;	propriety of transactions and unusual		and unusual occurrences;
		542.11(h)(7)(iii)	occurrences;		
4	Review all voids for propriety;	Review all voids for propriety; 542.11(h)(7)(iv)	13(d)(2)(v)(D) Review all voids for propriety;		Review all voids for propriety;
5	Verify the results as produced by the system	Verify the results as produced by the system	13(d)(2)(v)(E) Verify the results as produced		Verify the results as produced by the system to the
	to the results provided by an independent	to the results provided by an independent	by the system to the results provided by an		results provided by an independent source;
	source;	source; 542.11(h)(7)(v)	independent source;		
6	Regrade one-percent (1%) of paid (cashed)	Regrade 1% of paid (cashed) tickets to ensure	13(d)(2)(v)(F) Regrade 1% of paid (cashed)		Regrade one-percent (1%) of paid (cashed) tickets-
ŀ	tickets to ensure accuracy and propriety; and,	accuracy and propriety; and 542.11(h)(7)(vi)	tickets to ensure accuracy and propriety; and		to ensure accuracy and propriety; and,
7	When applicable, reconcile the totals of future	When applicable, reconcile the totals of future	13(d)(2)(v)(G) When applicable, reconcile the		When applicable, reconcile the totals of future
	• •		totals of future tickets written to the totals		tickets written to the totals produced by the
	•		produced by the system for both earned and		system for both earned and unearned take, and
		and review the reports to ascertain that future			review the reports to ascertain that future wagers
	•	-	ascertain that future wagers are properly		are properly included on the day of the event.
		1	included on the day of the event.		and property medical on the day of the events

	Pari-Mutuel Racing	542	NIGC Class III Guidance	Off Track Wagering Compact	Recommended Revisions
		542.2	BULLETIN 2018-3		
Н	At least annually, the auditor shall foot the	At least annually, the auditor shall foot the	13(d)(2)(vi) At least annually, foot the wagers		At least annually, the auditor shall foot the wager
	wagers for one (1) day and trace to the total	wagers for one day and trace to the total	for one day and trace to the total produced		for one (1) day and trace to the total produced by
	produced by the system.	produced by the system. 542.11(h)(8)	by the system.		the system.
I	At least one (1) day per quarter, the auditor	At least one day per quarter, the auditor	13(d)(2)(vii) At least one day per quarter,		At least one (1) day per quarter, the auditor shall
	shall recalculate and verify the change in the	<b>shall</b> recalculate and verify the change in the	recalculate and verify the change in the		recalculate and verify the change in the unpaid-
	unpaid winners to the total purged tickets.	unpaid winners to the total purged tickets.	unpaid winners to the total purged tickets.		winners to the total purged tickets.
		542.11(h)(9)			
			13(d)(2)(viii) At least monthly, review		
			statistical reports for any deviations exceeding		
			a specified threshold, as defined by the TGRA.		
			Investigate and document any large and		
			unusual fluctuatuions noted.		
				9(c) The Nation shall have prepared a complete	
				audit of the gaming operation, not less than	
				annually by an independent certified public	
				accountant with the results provided to the OSBI	
				and/or the OSF for their review.	

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
		542		543		
		542.13(a)(1) For this section only, credit or customer credit means a unit	1 · · · · · · · · · · · · · · · · · · ·	Financial instrument. Any tangible item of value		For this section only, credit or customer credit means a unit
		of value equivalent to cash or cash equivalents deposited, wagered,	a unit of value equivalent to cash or cash equivalents	tendered in Class II game play, including, but not limited		of value equivalent to cash or cash equivalents deposited,
		won, lost, or redeemed by a customer.	deposited, wagered, won, lost, or redeemed by a customer.	to bills, coins, vouchers, and coupons.		wagered, won, lost, or redeemed by a customer. Coins shall
				Voucher. A financial instrument or fixed wagering value,		include tokens.
		542.13(a)(2) Coins shall include tokens.	5(b)(2) Coins shall include tokens.	usually paper, that can be used only to acquire an		
				equivalent value of cashable credits or cash through		
				interaction with a voucher system. 543.2		
11.1	Manual Payouts for Gaming Machines, Fills, Short	542.13(d) <u>Jackpot payouts, gaming machines fills, short pays and</u>	5(c) Jackpot prize payout and fills.	543.8(e) Prize payout.	11.1	Manual Payouts for Gaming Machines, Fills, Short Pays.
11.1	Pays.	accumulated credit payouts standards.			11.1	Gaming Machine Prize Payouts.
			5(c) Controls must be established and procedures	543.8(e)(1) Controls must be established and procedures		Controls must be established and procedures implemented
			implemented for jackpot prize payout and fills that address	implemented for cash or cash equivalents that address	Α	for cash or cash equivalents that address the following:
			the following:	the following:		
			5(c)(1) Identification of the agent authorized (by position) to	543.8(e)(1)(i) Identification of the agent authorized (by	1	Identification of the agent authorized (by position) to make a
			make a payout;	position) to make a payout;	_	payout;
			5(c)(2) Predetermined payout authorization levels (by	543.8(e)(1)(ii) Predetermined payout authorization	2	Predetermined payout authorization levels (by position); and
			position);	levels (by position); and		
				543.8(e)(1)(iii) Documentation procedures ensuring		Documentation procedures ensuring separate control of the
			of the cash accountability functions. Documentation at	separate control of the cash accountability functions.	3	cash accountability functions.
			minimum must include the following information:			
	For jackpot payouts and Class II prize payouts, including	542.13(d)(1) For jackpot payouts and gaming machine fills,	5(c)(5) Documentation procedures ensuring separate control	543.8(e)(5)(i) At least two agents must authorize, sign,		For jackpot payouts and Class II prize payouts, including
	manual payouts and gaming machine fills, documentation	documentation shall include the following information: 542.13(d)(1)	of the cash accountability functions. Documentation at	and witness all manual payouts above \$1,200, or a lower		manual payouts and gaming machine fills, documentation
٨	shall include the following information:	_	minimum must include the following information:	threshold as authorized by management and approved	D	shall include the following information:
А				by the TGRA.	D	
1	Date and time;	542.13(d)(1)(i) Date and time;	5(c)(5)(i) Date and time;			
2	<del> </del>	542.13(d)(1)(ii) Machine number;	5(c)(5)(ii) Machine number;			
		542.13(d)(1)(iii) Dollar amount of cash payout or gaming machine fill	5(c)(5)(iii) Dollar amount of cash payout or gaming machine			Dollar amount of manual cash payout or gaming machine fill
			fill (both alpha and numeric) or description of personal			(both alpha and numeric) or description of personal property
	property awarded, including fair market value. Alpha is	including fair market value. Alpha is optional if another unalterable	property awarded, including fair market value. (Alpha is			awarded, including fair market value. Alpha is optional if
3	I' ' '	method is used for evidencing the amount of the payout;	optional if another unalterable method is used for evidencing		2	another unalterable method is used for evidencing the
3	evidencing the amount of the payout;		the amount of the payout);		٥	amount of the payout;
	For Class III game jackpots, game outcome (including reel	542.13(d)(1)(iv) Game outcome (including reel symbols, card values,	5(c)(5)(iv) Game outcome (including reel symbols, card		1	For Class III Covered game jackpots, game outcome
_		suits, etc.) for jackpot payouts. Game outcome is not required if a	values, suits, etc.) for jackpot payouts. Game outcome is not			(including reel symbols, card values, suits, etc.), and for
4	prize payouts, description of pattern covered, such as		required if a computerized jackpot/fill system is used; and		4	manual Class II prize payouts, description of pattern covered,
	cover-all or four corners;	1 9 19	,			such as cover-all or four corners;
		542.13(d)(1)(iv) Game outcome (including reel symbols, card values,	5(c)(5)(iv) Game outcome (including reel symbols, card			Game outcome is not required if a computerized jackpot/fill
5		suits, etc.) for jackpot payouts. Game outcome is not required if a	values, suits, etc.) for jackpot payouts. Game outcome is not		5	system is used provides a sufficient means of recording
ر	recording jackpot prizes won;	computerized jackpot/fill system is used;	required if a computerized jackpot/fill system is used; and			jackpot prizes won;
	Preprinted or concurrently printed sequential number, and	542.13(d)(1)(v) Preprinted or concurrently printed sequential number;	5(c)(5)(v) Preprinted or concurrently printed sequential		-	
6	printed or concurrency printed sequential number, and	and	number.			
			5(c)(6) Verification.		7	Verification, Authorization, and Signatures.

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
	witnessing the payout or gaming machine fill as otherwise provided in Section 11.1 (B); and	provided in paragraphs (d)(1)(vi)(A), (B), and (C) of this section).		· ·	8	
8	For Class II games offering a prize payout of \$1,200 or more, as the objects are drawn, the identity of the objects is immediately recorded. Such records must be maintained for a minimum of 24 hours.			543.8 (d)(4)(ii)	8	For Class II games offering a prize payout of \$1,200 or more, as the objects are drawn, the identity of the objects is immediately recorded. Such records must be maintained for a minimum of 24 hours.
В	require the signature and verification of a supervisory or management employee independent of the gaming machine department (in addition to the two signatures required in paragraph 11.1(A)(7) of this section). Alternatively, if an on-line accounting system is utilized, only two signatures are required: one employee and one supervisory or management employee independent of the gaming machine department. This predetermined amount shall be authorized by management (as approved by the CNGC), documented, and maintained. On graveyard shifts (eight-hour maximum) payouts/fills less than \$100 can be made without the payout/fill being witnessed by a second person. With regard to jackpot payouts and hopper fills,	542.13(d)(1)(vi)(A) Jackpot payouts over a predetermined amount shall require the signature and verification of a supervisory or management employee independent of the gaming machine department (in addition to the two signatures required in paragraph (d)(1)(vi) of this section). Alternatively, if an on-line accounting system is utilized, only two signatures are required: one employee and one supervisory or management employee independent of the gaming machine department. This predetermined amount shall be authorized by management (as approved by the Tribal gaming regulatory authority), documented, and maintained. 542.13(d)(1)(vi)(C) On graveyard shifts (eight-hour maximum) payouts/fills less than \$100 can be made without the payout/fill being witnessed by a second person. 542.13(d)(1)(vi)(B) With regard to jackpot payouts and hopper fills, the signature of one employee is sufficient if an on-line accounting system	5(c)(7)(iv) A gaming system may substitute for one authorization/signature verifying or authorizing a win, but may not substitute for a supervisory or management authorization/signature.  5(c)(7)(iii) The predetermined thresholds, whether set at the MICS level or lower, must be authorized by management, approved by the TGRA, documented, and maintained.	543.8(e)(5) (ii) Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by TGRA) must require one of the two signatures and verifications to be supervisory or management employee independent of the operation of Class II Gaming System bingo:  543.8(e)(5)(iv) A Class II gaming system may substitute for one authorization/signature verifying, validating or authorizing a winning card, but may not substitute for a supervisory or management authorization/signature.  543.8(e)(5)(iii) The predetermined thresholds, whether set at the MICS level or lower, must be authorized by management, approved by the TGRA, documented, and maintained.	C	
С		542.13(d)(2) For short pays of \$10.00 or more, and payouts required for accumulated credits, the payout form shall include the following information:		543.8(e)(6) Payout records, including manual payout records, must include the following information:	D	
1	Date and time;	542.13(d)(2)(i) Date and time;	5(c)(8)(i) Date and time;	543.8(e)(6)(i) Date and time;	1	
2	Machine number;	542.13(d)(2)(ii) Machine number;		543.8(e)(6)(iii) Bingo card identifier or player interface identifier.	2	
3	Dollar amount of payout (both alpha and numeric); and	542.13(d)(2)(iii) Dollar amount of payout (both alpha and numeric); and	· · · · · · · · · · · · · · · · · · ·	543.8(e)(6)(ii) Amount of payout (alpha & numeric for player interface payouts); and	3	

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
4	witnessing the payout. Where the payout amount is \$50.00 or more, signatures of at least two (2) employees verifying and witnessing the payout. Alternatively, the signature of one (1) employee is sufficient if an on-line accounting system is utilized and the payout amount is		involved in the transaction;	543.8(e)(3)(i) <i>Validation</i> . For manual payouts, at least two agents must determine the validity of the claim prior to the payment of a prize. The system may serve as one of the validators.  543.8(e)(4)(i) <i>Verification</i> . For manual payouts, at least two agents must verify that the winning pattern has been achieved on the winning card prior to the payment of a prize. The system may serve as one of the verifiers.  543.8(e)(6)(iv)(C) Signature of all, but not less than two, agents involved in the transaction;	4	
			5(c)(6)(ii) For automated payouts, the system may serve as the sole verifier that a winning pattern has been achieved.	543.8(e)(3)(ii) For automated payouts, the system may serve as one of the validators.  543.8(e)(4)(ii) For automated payouts, the system may serve as the sole verifier that the pattern has been achieved on the winning card.	5	For automated payouts, the system may serve as the sole validator of the claim/verifier that a winning pattern has been achieved.
			5(c)(8)(v) For override transactions, verification by a supervisory or management agent independent of the transaction; and		6	For override transactions, verification by a supervisory or management agent independent of the transaction; and
			5(c)(8)(vi) Any other information necessary to substantiate the payout.		7	Any other information necessary to substantiate the payout.
D	For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.			543.8(i)(1)(v) For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.  543.18(f)(2) Payments above \$600 (or lesser amount as approved by the TGRA) must be documented at the time of payment, and documentation must include the following:  (h)(1)(v) For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.	E	
	lower threshold, as authorized by management and approved by CNGC) must require one of the two signatures and verifications to be a supervisory or management employee independent of the operation of Gaming Systems:	require the signature and verification of a supervisory or management employee independent of the gaming machine department (in addition to the two signatures required in paragraph (d)(1)(vi) of this section). Alternatively, if an on-line accounting system is utilized, only two	5(c)(7)(ii) Manual jackpot prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by the TGRA) must require one of the two signatures and verifications to be a supervisory or management agent independent of gaming machine operations:	543.8e)(5)(ii) Manual prize payouts above the following threshold (or a lower threshold, as authorized by management and approved by TGRA) must require one of the two signatures and verifications to be supervisory or management employee independent of the operation of Class II Gaming System bingo:	F	
а	Five Thousand Dollars (\$5,000) for a Tier A facility;		5(c)(7)(ii)(A) \$5,000 for a Tier A facility;	543.8(e)(5)(ii)(A) \$5,000 for a Tier A facility;		
b	Ten Thousand Dollars (\$10,000) for a Tier B facility;		5(c)(7)(ii)(B) \$10,000 for a Tier B facility;	543.8(e)(5)(ii)(B) \$10,000 at a Tier B facility;		
С	Twenty Thousand Dollars (\$20,000) for a Tier C facility; or		5(c)(7)(ii)(C) \$20,000 for a Tier C facility; or	543.8(e)(5)(ii)(C) \$20,000 for a Tier C facility; or		
d	Fifty Thousand Dollars (\$50,000) for a Tier C facility with over \$100,000,000 in gross gaming revenues.		5(c)(7)(ii)(D) \$50,000 for a Tier C facility with over \$100,000,000 in gross gaming revenues.	543.8(e)(5)(ii)(D) \$50,000 for a Tier C facility with over \$100,000,000 in gross gaming revenues.		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
F		to prevent unauthorized access and fraudulent payouts by one person	5(c)(3) Computerized jackpot/fill systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one person.		G	Computerized jackpot/fill systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one person as required by Section 20 – Information Technology of this document.
G	that precludes any one (1) person from producing a	that precludes any one person from producing a fraudulent payout by forging signatures or by altering the amount paid out subsequent to the	5(c)(4) Payout forms shall be controlled and routed in a manner that precludes any one person from producing a fraudulent payout by forging signatures or by altering the amount paid out after the payout and misappropriating the funds; and		Н	
11.2	Gaming Machine Promotional Payouts or Awards.					
	awards that are not reflected on the gaming machine pay table, then the payout form/documentation shall include:					
_		542.13(e)(1)(i) Date and time;				
		542.13(e)(1)(ii) Machine number and denomination;				
		542.13(e)(1)(iii) Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc.), including fair market value;				
D	Type of promotion (e.g., double jackpots, four-of-a-kind bonus, etc.);	542.13(e)(1)(iv) Type of promotion (e.g., double jackpots, four-of-a-kind bonus, etc.); and				
F	Signature of at least one employee authorizing and	542.13(e)(1)(v) Signature of at least one employee authorizing and				
	completing the transaction.	completing the transaction.				
11.3	Promotional Payouts, Drawings, and Giveaway Programs.		10(f) Promotional payments, drawings, and giveaway programs.	543.18(f) Promotional payments, drawings, and giveaway programs.		
	The following procedures must apply to any payment		10(f) The following procedures must apply to any payment	543.18(f)The following procedures must apply to any		
	resulting from a promotional payment, drawing, or		resulting from a promotional payment, drawing, or giveaway	payment resulting from a promotional payment,		
	giveaway program disbursed by the cage department or		program disbursed by the cage department or any other	drawing, or giveaway program disbursed by the cage		
	any other department. This section does not apply to		department. This section does not apply to payouts for table			
	payouts for card game promotional pots and/or pools.		game promotional pots and/or pools.	not apply to payouts for card game promotional pots and/or pools.		
Α	All payments must be documented to support the cage			543.18(f)(1) All payments must be documented to		
	accountability.		accountability.	support the cage accountability.		
	Payments above \$600 (or lesser amount as approved by		10(f)(2) Payments above \$600 (or lesser amount as approved			
В	CNGC) must be documented at the time of the payment, and documentation must include the following:		by TGRA) must be documented at the time of payment, and			
	and documentation must include the following:		documentation must include the following:	the payment, and documentation must include the following: 543.18(f)(1)(2)		
1	Date and time;		10(f)(2)(i) Date and time;	543.18(f)(2)(i) Date and time;		
2	Dollar amount of payment or description of personal		10(f)(2)(ii) Dollar amount of payment or description of	543.18(f)(2)(ii) Dollar amount of payment or description		
	property (e.g. car);			of personal property;		
3	Reason for payment (e.g. name of promotion);			543.18(f)(2)(iii) Reason for payment; and		
4	Customer's name and confirmation that identity was		******	543.18(f)(2)(iv) Patron's name and confirmation that		
	verified (drawings only); and, Signature(s) of at least two agents verifying, authorizing,			identity was verified (drawings only). 543.18(f)(2)(v) Signature(s) of at least two agents		
	and completing the promotional payment with the			verifying, authorizing, and completing the promotional		
	patron. For computerized systems that validate and print		1	payment with the patron. For computerized systems		
5	the dollar amount of the payment on a computer		· · · · · · · · · · · · · · · · · · ·	that validate and print the dollar amount of the		
	generated form, only one signature is required.		form, only one signature is required.	payment on a computer generated form, only one signature is required.		
11.4	Cash-out Tickets/Vouchers.	Cash-out tickets.	5(g) Vouchers. & 10(h) Vouchers.	543.8(i) Vouchers. & 543.18(h) Vouchers.		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
	For gaming machines that utilize cash-out tickets, the following standards apply. This standard is not applicable to Tiers A and B. Tier A and B gaming operations shall	542.13(n) For gaming machines that utilize cash-out tickets, the following standards apply. This standard is not applicable to Tiers A and B. Tier A and B gaming operations shall develop adequate standards governing the security over the issuance of the cash-out paper to the gaming machines and the redemption of cash-out slips.				For gaming machines that utilize cash-out tickets, the following standards apply. This standard is not applicable to Tiers A and B. Tier A and B gaming operations shall develop adequate standards governing the security over the issuance of the cash-out paper to the gaming machines and the redemption of cash-out slips.
	standards in Section 7 – Gaming Systems of this document shall apply.	542.13(n)(1) In addition to the applicable auditing and accounting standards in paragraph (m) of this section, on a quarterly basis, the gaming operation shall foot all jackpot cash-out tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer system.				Gaming machine accounting and auditing procedure standards in Section 7 – Gaming Systems of this document shall apply.
			5(g)(1) Controls must be established and procedures implemented to:  10(h)(1) Controls must be established and procedures implemented to:	543.8(i)(1) Controls must be established and procedures implemented to: 543.18(h)(1)	Α	For cash-out tickets/vouchers, controls must be established and procedures implemented that include these standards.
В	jackpot cash-out tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer.	542.13(n)(1) In addition to the applicable auditing and accounting standards in paragraph (m) of this section, on a quarterly basis, the gaming operation shall foot all jackpot cash-out tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer system.				On a quarterly basis, the gaming operation shall foot all jackpot cash-out tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer.
С	gaming machine that reflects all remaining credits. The cash-out ticket shall be printed at the gaming machine by an internal document printer. The cash-out ticket shall be valid for a time period specified by the CNGC, or the gaming operation as approved by the CNGC. Cash-out tickets may be redeemed for payment or inserted in	542.13(n)(2) The customer may request a cash-out ticket from the gaming machine that reflects all remaining credits. The cash-out ticket shall be printed at the gaming machine by an internal document printer. The cash-out ticket shall be valid for a time period specified by the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority. Cash-out tickets may be redeemed for payment or inserted in another gaming machine and wagered, if applicable, during the specified time period.			В	The customer may request a cash-out ticket from the gaming machine that reflects all remaining credits. The cash-out ticket shall be printed at the gaming machine by an internal document printer. The cash-out tickets/vouchers shall be valid for a time period specified by the CNGC, or the gaming operation as approved by the CNGC. Cash-out tickets may be redeemed for payment or inserted in another gaming machine and wagered, if applicable, during the specified time period.
D	cashier's station where it can be validated. Alternatively, if a gaming operation utilizes a remote computer validation/redemption system (e.g. electronic kiosk), the CNGC, or the operation as approved by the CNGC shall	542.13(n)(3) The customer shall redeem the cash-out ticket at a change booth or cashiers' cage. Alternatively, if a gaming operation utilizes a remote computer validation system, the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall develop alternate standards for the maximum amount that can be redeemed, which shall not exceed \$2,999.99 per cash-out transaction.			С	The customer shall redeem the cash-out ticket/voucher at a cashier's station where it can be validated. Alternatively, if a gaming operation utilizes a remote computer validation/redemption system (e.g. electronic kiosk), the CNGC, or the operation as approved by the CNGC shall develop alternate standards for the maximum amount that can be redeemed, which shall not exceed \$2,999.99 per cashout transaction.
E		542.13(n)(4) Upon presentation of the cash-out ticket(s) for redemption, the following shall occur:			D	Upon presentation of the cash-out ticket/voucher for redemption, the following shall occur:
1	Scan the bar code via an optical reader or its equivalent; or,	or	5(g)(1)(i) Verify the authenticity of each voucher redeemed.  10(h)(1)(i) Verify the authenticity of each voucher redeemed.	543.8(i)(1)(i) Verify the authenticity of each voucher redeemed. 543.18(h)(1)(i)	1	Scan the bar code via an optical reader or its equivalent; or,

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
	Input the cash-out ticket validation number into the	542.13(n)(4)(ii) Input the cash-out ticket validation number into the	5(g)(1)(i) Verify the authenticity of each voucher redeemed.	543.8(i)(1)(i) Verify the authenticity of each voucher		Input the cash-out ticket/voucher validation number into the
	computer.	computer.		redeemed. 543.18(h)(1)(i)		computer.
2			10(h)(1)(i) Verify the authenticity of each voucher redeemed.		2	
	The information in paragraph F of this section shall be	542.13(n)(5) The information contained in paragraph (n)(4) of this	5(g)(1)(i) Verify the authenticity of each voucher redeemed.	543.8(i)(1)(i) Verify the authenticity of each voucher		The information in paragraph <b>E</b> D of this section shall be
		section shall be communicated to the host computer. The host	S(g)(1)(i) verify the authenticity of each voucher reaccined.	redeemed. 543.18(h)(1)(i)		communicated to the host computer. The host computer
F			10(h)(1)(i) Verify the authenticity of each voucher redeemed.	10000001.01.01.01.01.01.01.01.01.01.0	Е	shall verify the authenticity of the cash-out ticket/voucher
		communicate directly to the redeemer of the cash-out ticket.				and communicate directly to the cashier (redeemer). of the
	cash-out ticket.	•				cash-out ticket.
		542.13(n)(6) If valid, the cashier (redeemer of the cash-out ticket) pays	5(g)(1)(ii) If the voucher is valid, verify that the patron is paid	<u>-</u>		If valid, the cashier (redeemer) pays the customer the
			the appropriate amount. 10(h)(1)(ii)	patron is paid the appropriate amount. 543.18(h)(1)(ii)		appropriate amount and the cash-out ticket/voucher is
		electronically noted "paid" in the system. The "paid" cash-out ticket shall		542.007.43.43.2		electronically noted "paid" in the system. The "paid" cash out
			1 -	543.8(i)(1)(iv) Retain payment documentation for		ticket shall remain in the cashier's bank for reconciliation
_	system shall electronically reconcile the cashier's banks for		purposes. 10(h)(1)(iv)	reconciliation purposes. 543.18(h)(1)(iv)		purposes. The host validation computer system shall electronically reconcile the cashier's banks for the paid
G	the paid cashed-out tickets.		5(g)(4) Paid vouchers must be maintained in the cashier's	543.8(i)(4) Paid vouchers must be maintained in the	F	cashed-out tickets/vouchers.
	the paid cashed out tickets.		1 3/1 /	cashier's accountability for reconciliation purposes.		custical out tickets/voucitets.
			1	543.18(h)(4)		
			10(h)(4) Paid vouchers must be maintained in the cashier's			
			accountability for reconciliation purposes.			
						For manual payment of a cash-out ticket/voucher of \$500 or
						more, requires a supervisory employee to verify the validity
					G	of the cash-out ticket prior to payment.
						or the cash out hence prior to payment.
						The "paid" cash-out ticket(s)/voucher(s) shall remain in the
					Н	cashier's bank for reconciliation purposes.
	If invalid the host computers shall notify the cashier	542.13(n)(7) If invalid, the host computer shall notify the cashier				
	· · · · · · · · · · · · · · · · · · ·	(redeemer of the cash-out ticket). The cashier (redeemer of the cash-out				
Н	· ·	ticket) shall refuse payment to the customer and notify a supervisor of			I	
		the invalid condition. The supervisor shall resolve the dispute.				
		542.13(n)(8) If the host validation computer system temporarily goes	1 -	543.8(i)(1)(iii) Document the payment of a claim on a		To document the payment of a claim on a voucher that is
		3	1	voucher that is not physically available or a voucher that		not physically available or a voucher that cannot be validated
	station after recording the following:	cashier's cage after recording the following:	validated such as a mutilated, expired, lost, or stolen voucher.	•		(e.g., mutilated, expired, lost, or stolen voucher) or if the host
			10(h)(1)(iii) Document the payment of a claim on a voucher	stolen voucher.		validation computer system temporarily goes down, cashiers may redeem cash-out tickets at a cashier's station after
I			that is not physically available or a voucher that cannot be		J	recording the following:
			validated such as a mutilated, expired, lost, or stolen voucher.			recording the following.
			The same as a madiated, expired, lost, or storen voucher.			
1	Control numbers of the cook out the last	E42.12(a)(0)(i) Carial musehan af sha cook out should				
2	Serial number of the cash-out ticket;  Date and Time;	542.13(n)(8)(i) Serial number of the cash-out ticket; 542.13(n)(8)(ii) Date and time;				
		542.13(n)(8)(iii) Dollar amount;				
		542.13(n)(8)(iv) Issuing gaming machine number;				
	Marking ticket "paid"; and	542.13(n)(8)(v) Marking ticket "paid"; and	5(g)(2) Vouchers paid during a period while the voucher	543.8(i)(2) Vouchers paid during a period while the		
				voucher system is temporarily out of operation must be		
			"paid" by the cashier.	marked "paid" by the cashier. 543.18(h)(2)		
5						
			10(h)(2) Vouchers paid during a period while the voucher			
			system is temporarily out of operation must be marked			
L	ļ		"naid" by the cashier		<u> </u>	

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
6	purposes.		5(g)(4) Paid vouchers must be maintained in a cashier's accountability for reconciliation purposes.  10(h)(4) - Standard is applicable to all voucher redeemed, not just those redeemed while the voucher system is temporarily out of operation.		6	
J	For manual payment of a cash-out ticket of \$500 or more, requires a supervisory employee to verify the validity of the cash-out ticket prior to payment.				Ĵ	For manual payment of a cash-out ticket of \$500 or more, requires a supervisory employee to verify the validity of the cash-out ticket prior to payment.
К			5(g)(3) Vouchers redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system. 10(h)(3)	543.8(i)(3) Vouchers redeemed while the voucher system was temporarily out of operation must be validated as expeditiously as possible upon restored operation of the voucher system. 543.18(h)(3)	7	
					8	If the host validation computer system is down for more than four (4) hours, the gaming operation shall promptly notify the CNGC or its designated representative.
			5(g)(5) Unredeemed vouchers can only be voided in the voucher system by supervisory agents. The accounting department will maintain the voided voucher, if available. 10(h)(5)	543.8(i)(5) Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The accounting department will maintain the voided voucher, if available. 543.18(h)(5)	K	Unredeemed cash-out tickets/vouchers can only be voided in the voucher system by supervisory agents. The accounting department will maintain the voided cash-out ticket/voucher, if available.
L	CNGC, shall establish and comply with procedures to	542.13(n)(10) The Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, shall establish and the gaming operation shall comply with procedures to control cash-out ticket paper, which shall include procedures that:			L	
1	Mitigate the risk of counterfeiting of cash-out ticket paper;	542.13(n)(10)(i) Mitigate the risk of counterfeiting of cash-out ticket paper;			1	
2	Adequately control the inventory of the cash-out ticket paper;	542.13(n)(10)(ii) Adequately control the inventory of the cash-out ticket paper; and			2	
3		542.13(n)(10)(iii) Provide for the destruction of all unused cash-out ticket paper.			3	
	Alternatively, if the gaming operation utilizes a computer	542.13(n)(10)(iv) Alternatively, if the gaming operation utilizes a computer validation system, this standard shall not apply.			4	
М	<u> </u>	542.13(n)(11) If the host validation computer system is down for more than four (4) hours, the gaming operation shall promptly notify the Tribal gaming regulatory authority or its designated representative.			М	If the host validation computer system is down for more than four (4) hours, the gaming operation shall promptly notify the CNGC or its designated representative.
N	other standards (as applicable) in this document.	542.13(n)(12) These gaming machine systems shall comply with all other standards (as applicable) in this part including: (i) Standards for bill acceptor drop and count; (ii) Standards for coin drop and count; and (iii) Standards concerning EPROMS or other equivalent game software media. 542.13(n)(12)(i)(ii)(iii)			М	These gaming machine systems Cash-out ticket/voucher, and related systems shall comply with all other standards (as applicable) in this document.

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
	Controls must be established and procedures		5(g)(1) Controls must be established and procedures	543.8(i)(1) Controls must be established and procedures		Controls must be established and procedures implemented
0	implemented to:		implemented to:  10(h)(1) Controls must be established and procedures implemented to:	implemented to: 543.18(h)(1)	Φ	<del>to:</del>
1	Verify the authenticity of each voucher redeemed.		-	543.8(i)(1)(i) Verify the authenticity of each voucher redeemed. 543.18(h)(1)(i)	1	Verify the authenticity of each voucher redeemed.
	If the voucher is valid, verify that the patron is paid the		5(g)(1)(ii) If the voucher is valid, verify that the patron is paid	543.8(i)(1)(ii) If the voucher is valid, verify that the		If the voucher is valid, verify that the patron is paid the
	appropriate amount.		the appropriate amount.	patron is paid the appropriate amount. 543.18(h)(1)(ii)		appropriate amount.
2			10(h)(1)(ii) If the voucher is valid, verify that the patron is paid the appropriate amount.		<del>2</del>	
	Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.		that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.	543.8(i)(1)(iii) Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher. 543.18(h)(1)(iii)		Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.
3			10(h)(1)(iii) Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as a mutilated, expired, lost, or stolen voucher.		3	
	Retain payment documentation for reconciliation purposes.		5(g)(1)(iv) Retain payment documentation for reconciliation purposes.	543.8(i)(1)(iv) Retain payment documentation for reconciliation purposes. 543.18(h)(1)(iv)		Retain payment documentation for reconciliation purposes.
4			10(h)(1)(iv) Retain payment documentation for reconciliation purposes.		4	
	For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.		established by management and approved by the TGRA,	543.8(i)(1)(v) For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment. 543.18(h)(1)(v)		For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.
5			voucher prior to payment.		5	
			10(h)(1)(v) For manual payment of a voucher in an amount established by management and approved by the TGRA, require a supervisory employee to verify the validity of the			
			voucher prior to payment			

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
	Vouchers paid during a period while the voucher system		5(g)(2) Vouchers paid during a period while the voucher	543.8(i)(2) Vouchers paid during a period while the		Vouchers paid during a period while the voucher system is
	is temporarily out of operation must be marked "paid" by		system is temporarily out of operation must be marked	voucher system is temporarily out of operation must be		temporarily out of operation must be marked "paid" by the
	the cashier.		"paid" by the cashier.	marked "paid" by the cashier. 543.18(h)(2)		<del>cashier.</del>
Р					P	
			10(h)(2) Vouchers paid during a period while the voucher			
			system is temporarily out of operation must be marked			
			"paid" by the cashier			
	Vouchers redeemed while the voucher system was		5(g)(3) Vouchers redeemed while the voucher system was	543.8(i)(3) Vouchers redeemed while the voucher system		Vouchers redeemed while the voucher system was
	temporarily out of operation must be validated as		temporarily out of operation must be validated as	was temporarily out of operation must be validated as		temporarily out of operation must be validated as
	expeditiously as possible upon restored operation of the		expeditiously as possible upon restored operation of the	expeditiously as possible upon restored operation of the		expeditiously as possible upon restored operation of the
	voucher system.		voucher system.	voucher system. 543.18(h)(3)	_	voucher system.
Q					Q	
			10(h)(3) Vouchers redeemed while the voucher system was			
			temporarily out of operation must be validated as			
			expeditiously as possible upon restored operation of the			
	Paid vouchers must be maintained in the cashier's		5(g)(4) Paid vouchers must be maintained in a cashier's	543.8(i)(4) Paid vouchers must be maintained in a		Paid vouchers must be maintained in the cashier's
	accountability for reconciliation purposes.		accountability for reconciliation purposes.	cashier's accountability for reconciliation purposes.		accountability for reconciliation purposes.
R	accountability for reconciliation purposes.			543.18(h)(4)	R	accountability for reconcination purposes.
'`			10(h)(4) Paid vouchers must be maintained in the cashier's	J-J., ±0(1)( <del>1)</del>		
			accountability for reconciliation purposes.			
	Unredeemed vouchers can only be voided in the voucher			543.8(i)(5) Unredeemed vouchers can only be voided in		Unredeemed vouchers can only be voided in the voucher
	system by supervisory employees. The accounting		voucher system by supervisory agents. The accounting	the voucher system by supervisory employees. The		system by supervisory employees. The accounting
	department will maintain the voided voucher, if available.		department will maintain the voided voucher, if available.	accounting department will maintain the voided		department will maintain the voided voucher, if available.
				voucher, if available. 10(h)(5)		
S			10(h)(5) Unredeemed vouchers can only be voided in the	( )	S	
			voucher system by supervisory employees. The accounting			
			department will maintain the voided voucher, if available.			
	Patron accounts and cashless systems.		0()6			
	Supervision. Supervision must be provided as needed for		8(a)Supervision. Supervision must be provided as needed for			
Α	patron deposit accounts and cashless systems by an		patron deposit accounts and cashless systems by an agent(s)			
	agent(s) with authority equal to or greater than those		with authority equal to or greater than those being			
	being supervised.  All smart cards (i.e. cards that possess the means to	Smart cards. All smart cards (i.e., cards that possess the means to	supervised. 8(b)(1) Smart cards cannot maintain the only source of	Patron deposit accounts and cashless systems . Smart		
		electronically store and retrieve data) that maintain the only source of	account data.	cards cannot maintain the only source of account data.		
В		account data are prohibited. 542.13(p)	account data.	543.14(b)(1)		
	pource or account data are profibited.	account data are promoted. 572.13(p)		5-5.1-(b)(1)		
	Establishment of patron deposit accounts. The following		8(b)(2) Establishment of patron deposit accounts. The	Establishment of patron deposit accounts. The following		
С	standards apply when a patron establishes an account.			standards apply when a patron establishes an account.		
	1,7		account:	543.14(b)(2)		
	The patron must appear at the gaming operation in			The patron must appear at the gaming operation in		
1	person, at a designated area of accountability, and		person, at a designated area of accountability, and present	person, at a designated area of accountability, and		
1	present valid government issued picture identification;		valid government issued picture identification; and	present valid government issued picture identification;		
	and			and 543.14(b)(2)(i)		
	An agent must examine the patron's identification and			An agent must examine the patron's identification and		
2	record the following information:		and record the following information:	record the following information: 543.14(b)(2)(ii)		
а	Type of identification credential examined;		8(b)(2)(ii)(A) Type, number, and expiration date of the	Type, number, and expiration date of the identification;		
	The same dentied as small a			543.14(b)(2)(ii)(A)		
b	The credential number;		8(b)(2)(ii)(A) Type, number, and expiration date of the			
	The contration date of anadousticle and		identification;	}		
С	The expiration date of credential; and,		8(b)(2)(ii)(A) Type, number, and expiration date of the			
d	Patron's name;		identification; 8(b)(2)(ii)(B) Patron's name;	Patron's name; 543.14(b)(2)(ii)(B)		
	A unique account identifier;		8(b)(2)(ii)(C) A unique account identifier;	A unique account identifier; 543.14(b)(2)(ii)(C)		
e	Date the account identifier;		8(b)(2)(ii)(D) Date the account was opened; and,	Date the account was opened; and 543.14(b)(2)(ii)(C)		
f	pate the account was opened, and,		σιση ελιίνου σατέ της account was opened, and,	Date the account was opened, and 343.14(b)(2)(II)(b)		
<u> </u>			I	1		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
a	The agent's name;		8(b)(2)(ii)(E) The agent's name.	The agent's name. 543.14(b)(2)(ii)(E)		
	The patron must sign the account documentation before		8(b)(3) The patron must sign the account documentation	The patron must sign the account documentation		
	the agent may activate the account.		before the agent may activate the account.	before the agent may activate the account.		
	the agent may activate the account.		before the agent may activate the account.	543.14(b)(3)		
	The agent or cashless system must provide the patron		8(b)(4) The agent or cashless system must provide the patron			
	deposit account holder with a secure method of access.		deposit account holder with a secure method of access.	deposit account holder with a secure method of access.		
_	deposit account noider with a secure method of access.		deposit account noider with a secure method of access.	543.14(b)(4)		
				Adustments made to the patron deposit accounts must		
	Patron deposits, withdrawals and adjustments.		8(c) Patron deposits, withdrawals and adjustments.	Patron deposits, withdrawals and adjustments.		
D	Patron deposits, withdrawais and adjustments.		o(c) Patron deposits, withdrawais and adjustifients.	-		
	Prior to the patron making a deposit or withdrawal from a		8(c)(1) Prior to the patron making a deposit or withdrawal	543.14(c) Prior to the patron making a deposit or withdrawal from		
	patron deposit account, the agent or cashless system		from a patron deposit account, the agent or cashless system	a patron deposit account, the agent or cashless system		
	must verify the patron deposit account, identity of the		must verify the patron deposit account, the patron identity,	must verify the patron deposit account, the patron		
1 1	patron and availability of funds. Reliance on a secured		and availability of funds. A personal identification number	identity, and availability of funds. A personal		
	Personal Identification Number (PIN) entered by the		(PIN) is an acceptable form of verifying identification	identification number (PIN) is an acceptable form of		
	patron is an acceptable method of verifying identification		isdentification.	verifying identification. 543.14(c)(1)		
	isdentification.					
<u> </u>						
2	Adjustments made to the patron deposit accounts must		8(c)(2) Adjustments made to the patron deposit accounts			
	be performed by an agent.		must be performed by an agent.			
	When a deposit, withdrawal, or adjustment is processed		8(c)(3) When a deposit, withdrawal, or adjustment is	When a deposit, withdrawal, or adjustment is processed		
1 7	by an agent, a transaction record must be created		: = = = = = = = = = = = = = = = = = = =	by an agent, a transaction record must be created		
	containing the following information:		containing the following information:	containing the following information: 543.14(c)(3)		
a	Same document number on all copies;		8(c)(3)(i) Same document number on all copies;	Same document number on all copies; 543.14(c)(3)(i)		
u						
b	Type of transaction, (deposit, withdrawal, or adjustment);		8(c)(3)(ii) Type of transaction, (deposit, withdrawal, or	Type of transaction, (deposit, withdrawal, or		
Б			adjustment);	adjustment); 543.14(c)(3)(ii)		
c	Name of other identifier of the patron;		8(c)(3)(iii) Name of other identifier of the patron;	Name or other identifier of the patron; 543.14(c)(3)(iii)		
C						
d	The unique account identifier;		8(c)(3)(iv) The unique account identifier;	The unique account identifier; 543.14(c)(3)(iv)		
	Patron signature for withdrawals, unless a secured method		8(c)(3)(v) Patron signature for withdrawals, unless a secured	Patron signature for withdrawals, unless a secured		
е	of access is utilized;		method of access is utilized;	method of access is utilized; 543.14(c)(3)(v)		
	For adjustments to the account, the reason for the		8(c)(3)(vi) For adjustments to the account, the reason for the			
1	adjustment;		adjustment;			
g	Date and time of transaction;		8(c)(3)(vii) Date and time of transaction;	Date and time of transaction; 543.14(c)(3)(vii)		
h	Amount of transaction;		8(c)(3)(viii) Amount of transaction;	Amount of transaction; 543.14(c)(3)(viii)		
	Nature of deposit or withdrawal or adjustment (e.g., cash,		8(c)(3)(ix) Nature of deposit, withdrawal, or adjustment (cash,	Nature of deposit, withdrawal, or adjustment (cash,		Nature of deposit, or withdrawal, or adjustment (e.g., cash,
'	check, chips); and,		check, chips); and,	check, chips); and 543.14(c)(3)(ix)		check, chips); and,
	Signature of the agent processing the transaction.			Signature of the agent processing the transaction.		
J	3 , 3 ,			543.14(c)(3)(x)		
	When a patron deposits or withdraws funds from a patron		8(c)(4) When a patron deposits or withdraws funds from a	When a patron deposits or withdraws funds from a		
	deposit account electronically, the following must be		· · · · · · · · · · · · · · · · · · ·	patron deposit account electronically, the following		
	recorded:		recorded:	must be recorded: 543.14(c)(4)		
а	Date and time of transaction;		8(c)(4)(i) Date and time of transaction;	Date and time of transaction; 543.14(c)(4)(i)		
	Location (player interface, kiosk);		8(c)(4)(ii) Location (gaming machine, kiosk);	Location (player interface, kiosk); 543.14(c)(4)(ii)		Location (gaming machine/player interface, kiosk);
b	(F. F.)		- Control of the second of the	(E)		games (games) play of misoriace, klosky,
	Type of transaction (deposit, withdrawal);		8(c)(4)(iii) Type of transaction (deposit, withdrawal);	Type of transaction (deposit, withdrawal);		
С	. 7F 2 2 . (asposid minimum)			543.14(c)(4)(iii)		
d	Amount of transaction; and,		8(c)(4)(iv) Amount of transaction; and,	Amount of transaction; and 543.14(c)(4)(iv)		
	The unique account identifier.		8(c)(4)(v) The unique account identifier.	The unique account identifier. 543.14(c)(4)(v)		
-	The unique account identifier.		οιοχιτητή της απιφας αccount identifier.	Vouchers. Controls must be established and procedures		Double check and delete rows.
				<u> </u>		Double clieck and delete lows.
				implemented to: Retain payment documentation for		
				reconciliation purposes. (4) Paid vouchers must be		
				maintained in the cashier's accountability for		
				reconciliation purposes. 543.8(i)(1)(iv), (i)(4)		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
KLF	Section 11 - Casino Instruments	342	BULLETIN 2018-3	J43	KLF	Section 11 - Casino Instruments
	Jeen La Casino Instituirents		DOLLLING ZOTO-2	When a patron deposits or withdraws funds from a		Control 22 Custio Albardinents
				patron deposit account electronically, the following		
				must be recorded: 543.14(c)(4)		
				Adustments made to the patron deposit accounts must		
				be performed by an agent. 543.14(c)(2)543.14(c)(2)		
				Se perioritied by an agenta 5 15.12 ((c)(2)5 15.12 ((c)(2)		
				Adjustments made to the patron deposit accounts must		
				be performed by an agent. 543.14(c)(2)		
				When a deposit, withdrawal, or adjustment is processed		
				by an agent, a transaction record must be created		
				containing the following information: 543.14(c)(3)		
				The unique account identifier; 543.14(c)(3)(iv)		
				Type of transaction, (deposit, withdrawal, or		
				adjustment); 543.14(c)(3)(ii)		
				Name or other identifier of the patron; 543.13(c)(3)(iii)		
				The unique account identifier; 543.14(c)(3)(iv)		
				Date and time of transaction; 543.14(c)(3)(vii)		
				Amount of transaction; 543.14(c)(3)(viii)		
				Nature of deposit, withdrawal, or adjustment (cash,		
				check, chips); and 543.14(c)(3)(ix)		
				For adjustments to the account, the reason for the		
				adjustment; 543.14(c)(3)(vi)		
				Signature of the agent processing the transaction.		
				543.14(c)(3)(x)  Vouchers. Controls must be established and procedures		
				implemented to: Retain payment documentation for		
				reconciliation purposes. (4) Paid vouchers must be		
				maintained in the cashier's accountability for		
				reconciliation purposes. 543.8(i)(1)(iv), (i)(4)		
				reconciliation purposes. 345.6(i)(1)(iv), (i)(4)		
				If electronic funds transfers are made to or from a		
				gaming operation bank account for patron deposit		
				account funds, the bank account must be dedicated and		
				may not be used for any other types of transactions.		
				543.14(c)(6)		
1 1	Patron deposit account transaction records must be		8(c)(5) Patron deposit account transaction records must be	Patron deposit account transaction records must be		
E	vailable to the patron upon reasonable request.		available to the patron upon reasonable request.	available to the patron upon reasonable request.		
				543.14(c)(5)		
	f electronic funds transfers are made to or from a gaming		8(c)(6) If electronic funds transfers are made to or from a	If electronic funds transfers are made to or from a		
	operation bank account for patron deposit account funds,		gaming operation bank account for patron deposit account	gaming operation bank account for patron deposit		
	he bank account must be dedicated and may not be used		funds, the bank account must be dedicated and may not be	account funds, the bank account must be dedicated and		
	or any other types of transactions.		used for any other types of transactions.	may not be used for any other types of transactions.		
	/ariances. The operation must establish, as approved by		8(d) Variances. The operation must establish, as approved	543.14(c)(6)		
			·			
1 0 1	CNGC, the threshold level at which a variance must be		by, the threshold level at which a variance must be reviewed			
	eviewed to determine the cause. Any such review must be documented.		to determine the cause. Any such review must be			
	De documented. Account Access Cards.	542.13(o) Account access cards.	documented.			
		542.13(o) For gaming machines that utilize account access cards to				
		activate play of the machine, the following standards shall apply:				
	apply:	542.13(o)				
		542.13(o)(1) Equipment .				
	A central computer, with supporting hardware and	542.13(o)(1)(i) A central computer, with supporting hardware and				
1 1	oftware, to coordinate network activities, provide system	software, to coordinate network activities, provide system interface, and				
	nterface, and store and manage a player/account	store and manage a player/account database;				
	database.					

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
		542.13(o)(1)(ii) A network of contiguous player terminals with touch-	2022 2020 0			
		screen or button-controlled video monitors connected to an electronic				
2		selection device and the central computer via a communications				
	•	·				
	via a communications network  One or more electronic selection devices, utilizing random	network; 542.13(o)(1)(iii) One or more electronic selection devices, utilizing			†	
	5	random number generators, each of which selects any combination or				
	-	combinations of numbers, colors, and/or symbols for a network of				
		player terminals.				
1 .	symbols for a network of player terminals.	piayer terrifilais.				
В	Player terminal standards.	542.13(o)(2) Player terminals standards.			1	
<u> </u>	,	542.13(o)(2)(i) The player terminals are connected to a game server;			<u> </u>	The player terminals standards are connected to a game
1	server.	, , , , , , , , , , , , , , , , , , ,			1	server.
		542.13(o)(2)(ii) The game server shall generate and transmit to the bank			1	
	-	of player terminals a set of random numbers, colors, and/or symbols at				
	• •	regular intervals. The subsequent game results are determined at the				
2		player terminal and the resulting information is transmitted to the				
		account server;				
	information is transmitted to the account server.	account Server,				
_	The game server shall be housed in a game server room	542.13(o)(2)(iii) The game server shall be housed in a game server room			1	
3		or a secure locked cabinet.				
С		542.13(o)(3) Customer account maintenance standards.			1	
		542.13(o)(3)(i) A central computer acting as an account server shall			1	
		provide customer account maintenance and the deposit/withdrawal				
1 1	1	function of those account balances;				
	deposity withdrawar function of those account balances.	naries of those account balances,				
	Customers may access their accounts on the computer	542.13(o)(3)(ii) Customers may access their accounts on the computer			1	
	-	system by means of an account access card at the player terminal. Each				
		player terminal may be equipped with a card reader and personal				
l l		identification number (PIN) pad or touch screen array for this purpose;				
	purpose.	nacinalization number (1214) pad or touch screen alray for this purpose,				
		542.13(o)(3)(iii) All communications between the player terminal, or			1	
3	• •	bank of player terminals, and the account server shall be encrypted for				
	' '	security reasons.				
D		542.13(o)(4) Customer account generation standards.			1	
<u> </u>	3	542.13(o)(4)(i) A computer file for each customer shall be prepared by a			1	
		clerk, with no incompatible functions, prior to the customer being				
	•	issued an account access card to be utilized for machine play. The				
	-	customer may select his/her PIN to be used in conjunction with the				
		account access card.				
	card	account access card.				
2	For each customer file, an employee shall:	542.13(o)(4)(ii) For each customer file, an employee shall:			†	
		542.13(o)(4)(ii)(A) Record the customer's name and current address;				
а		. , , , , ,				
b	The date the account was opened; and,	542.13(o)(4)(ii)(B) The date the account was opened; and			1	
		542.13(o)(4)(ii)(C) At the time the initial deposit is made, account				
	•	opened, or credit extended, the identity of the customer shall be verified				
	=	by examination of a valid driver's license or other reliable identity				
	-	credential.				
] ,	. S. a.					
	The clerk shall sign-on with a unique password to a	542.13(o)(4)(iii) The clerk shall sign-on with a unique password to a			1	
		terminal equipped with peripherals required to establish a customer				
		account. Passwords are issued and can only be changed by information				
		technology personnel at the discretion of the department director.				
	- · ·	<del></del>				
l l	•	(Revised May 11, 2006)				
	with Section 20 – Information Technology.	1				
<u> </u>	<del></del>	<u> </u>		L		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
KEF	Section 11 - Casino Instruments	342	BULLETIN 2018-3	343	KEF	Section 11 - Casino Instruments
		EA2 12(a)(A)(i.) After entering a greatist and acceptant PINI	BULLETIN 2018-3			Section 11 - Casino Instruments
		542.13(o)(4)(iv) After entering a specified number of incorrect PIN				
		entries at the cage or player terminal, the customer shall be directed to				
-		proceed to a clerk to obtain a new PIN. If a customer forgets, misplaces				
		or requests a change to their PIN, the customer shall proceed to a clerk				
	change to their PIN, the same procedures shall apply.	for assistance. (Revised May 11, 2006)				
	Deposit of credits standards.	542.13(o)(5) Deposit of credits standards .				
		542.13(o)(5)(i) The cashier shall sign-on with a unique password to a				The cashier shall sign-on with a unique password to a cashier
		cashier terminal equipped with peripherals required to complete the				terminal equipped with peripherals required to complete the
		credit transactions. Passwords are issued and can only be changed by				credit transactions(s). Passwords are issued and can only be
	•	information technology personnel at the discretion of the department				changed by information technology personnel at the
					1 I	discretion of the Department director and in accordance
	,	director.				with Section 14 Key and Access Controls 20 - Information
	and in accordance with Section 14 Key and Access					-
	Controls.					Technology.
	The customer shall present cash, chips, coin, or cash	542.13(o)(5)(ii) The customer shall present cash, chips, coin or coupons				
	·	along with their account access card to a cashier to deposit credits.				
	card to a cashier to deposit credits.					
	The cashier shall complete the transaction by entering an	542.13(o)(5)(iii) The cashier shall complete the transaction by utilizing a				
3	account number or utilizing a card scanner that the	card scanner that the cashier shall slide the customer's account access				
	cashier shall slide the customer's account access card	card through.				
	through.	-				
	The cashier shall accept the funds from the customer and	542.13(o)(5)(iv) The cashier shall accept the funds from the customer				
4	enter the appropriate amount on the cashier terminal.	and enter the appropriate amount on the cashier terminal.				
		542.13(o)(5)(v) A multi-part deposit slip shall be generated by the point				
		of sale receipt printer. The cashier shall direct the customer to sign the				
5		deposit slip receipt. One copy of the deposit slip shall be given to the				
		customer. The other copy of the deposit slip shall be secured in the				
	**	cashier's cash drawer.				T
	<del>-</del>	542.13(o)(5)(v) A multi-part deposit slip shall be generated by the point				The cashier shall direct the customer to sign the deposit slip
а		of sale receipt printer. The cashier shall direct the customer to sign the				receipt,
а		deposit slip receipt. One copy of the deposit slip shall be given to the			а	
		customer. The other copy of the deposit slip shall be secured in the				
	One copy of the deposit slip shall be given to the	cashier's cash drawer. 542.13(o)(5)(v) A multi-part deposit slip shall be generated by the point				
	· · · · · · · · · · · · · · · · · · ·	of sale receipt printer. The cashier shall direct the customer to sign the				
b		deposit slip receipt. One copy of the deposit slip shall be given to the				
		customer. The other copy of the deposit slip shall be secured in the				
		cashier's cash drawer.				
	The other copy of the deposit slip shall be secured in the	542.13(o)(5)(v) A multi-part deposit slip shall be generated by the point				
		of sale receipt printer. The cashier shall direct the customer to sign the				
С		deposit slip receipt. One copy of the deposit slip shall be given to the				
		customer. The other copy of the deposit slip shall be secured in the				
		cashier's cash drawer.				
		542.13(o)(5)(vi) The cashier shall verify the customer's balance before				
ı n	· · · · · ·	completing the transaction. The cashier shall secure the funds in their				
	funds in their cash drawer and return the account access	cash drawer and return the account access card to the customer.				
	card to the customer.				<u> </u>	
		542.13(o)(5)(vii) Alternatively, if a kiosk is utilized to accept a deposit of				
		credits, the Tribal gaming regulatory authority, or the gaming operation				
/		as approved by the Tribal gaming regulatory authority, shall establish				
		and the gaming operation shall comply with procedures that safeguard				
		the integrity of the kiosk system.				
F	Prize standards.	542.13(o)(6) Prize standards.				
		542.13(o)(6)(i) Winners at the gaming machines may receive cash, prizes				
1 1		redeemable for cash or merchandise.				

REF	CN TICS	542	NIGC Class III Guidance	543	REF	Recommended Revisions
	Section 11 - Casino Instruments	• 12	BULLETIN 2018-3			Section 11 - Casino Instruments
		542.13(o)(6)(ii) If merchandise prizes are to be awarded, the specific type				
_	of prize or prizes that may be won shall be disclosed to	of prize or prizes that may be won shall be disclosed to the player				
2		before the game begins.				
	the player before the game begins.	before the game begins.				
	The redemption period of account access cards, as	542.13(o)(6)(iii) The redemption period of account access cards, as				
3		approved by the Tribal gaming regulatory authority, shall be				
	the gaming operation.	conspicuously posted in the gaming operation.				
G	Credit withdrawal.	542.13(o)(7) Credit withdrawal.				
	The customer shall present their account access card or	542.13(o)(7) The customer shall present their account access card to a				
	ticket to the cashier to withdraw their credits. The cashier	cashier to withdraw their credits. The cashier shall perform the following	:			
	shall perform the following:	·				
1	Scan the account access card;	542.13(o)(7)(i) Scan the account access card;				
2	Request the customer to enter their PIN, if the PIN was	542.13(o)(7)(ii) Request the customer to enter their PIN, if the PIN was				
2	selected by the customer;	selected by the customer;				
	The cashier shall ascertain the amount the customer	542.13(o)(7)(iii) The cashier shall ascertain the amount the customer				
3	wishes to withdraw and enter the amount into the	wishes to withdraw and enter the amount into the computer;				
	computer;					
	A multi-part withdrawal slip shall be generated by the	542.13(o)(7)(iv) A multi-part withdrawal slip shall be generated by the				A multi-part withdrawal slip shall be generated by the point-
4	point-of-sale receipt printer. The cashier shall direct the	point of sale receipt printer. The cashier shall direct the customer to sign	ı		Λ	of-sale receipt printer. The cashier shall direct the customer
4	customer to sign the withdrawal slip; and,	the withdrawal slip;			7	to sign the withdrawal slip; <del>and,</del>
5	The cashier shall verify that the account access card and	542.13(o)(7)(v) The cashier shall verify that the account access card and				
	the customer match by:	the customer match by:				
a	Comparing the customer to image on the computer	542.13(o)(7)(v)(A) Comparing the customer to image on the computer				
	screen;	screen;				
b	· · · ·	542.13(o)(7)(v)(B) Comparing the customer to image on customer's				
	picture identification; or	picture ID; or				
		542.13(o)(7)(v)(C) Comparing the customer signature on the withdrawal				
С	to signature on the computer screen.	slip to signature on the computer screen.				
	The cashier shall verify the customer's balance before	542.13(o)(7)(vi) The cashier shall verify the customer's balance before				The cashier shall verify the customer's balance before
	completing the transaction. The cashier shall pay the	completing the transaction. The cashier shall pay the customer the				completing the transaction. The cashier shall pay the
6		appropriate amount, issue the customer the original withdrawal slip and			6	customer the appropriate amount, issue the customer the
						1
	3	return the account access card to the customer;				original withdrawal slip, and return the account access card
	card to the customer.  The copy of the withdrawal slip shall be placed in the cash.	542.13(o)(7)(vii) The copy of the withdrawal slip shall be placed in the				to the customer:: The copy of the withdrawal slip shall be placed in the cash
	drawer. All account transactions shall be accurately	cash drawer. All account transactions shall be accurately tracked by the				drawer. All account transactions shall be accurately tracked
	,	account server computer system. The copy of the withdrawal slip shall				by the account server computer system. The copy of the
/		be forwarded to the accounting department at the end of the gaming			7	withdrawal slip shall be forwarded to the accounting
	·					department at the end of the gaming day; and
	accounting department at the end of the gaining day.	day; and				department at the end of the gailing day, and
	In the event the imaging function is temporarily disabled,	542.13(o)(7)(viii) In the event the imaging function is temporarily				
		disabled, customers shall be required to provide positive ID for cash				
1 X	identification for cash withdrawal transactions at the	withdrawal transactions at the cashier stations.				
	cashier stations.	3. 2. 2. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3. 3.				
11.7		Smart cards.				
	All smart cards (i.e., cards that possess the means to	542.13(p) All smart cards (i.e., cards that possess the means to	8(b)(1)			
	electronically store and retrieve data) that maintain the	electronically store and retrieve data) that maintain the only source of				
	-	account data are prohibited.				
	•					
11.8	Coupon Standards.					

	542	NIGC Class III Guidance	543	REF	Recommended Revisions
Section 11 - Casino Instruments		BULLETIN 2018-3			Section 11 - Casino Instruments
rogram for the exchange of coupons for chips,	<u>Coupon standards.</u> Any program for the exchange of coupons for		543.2 Coupon. A financial instrument of fixed wagering		
s, and/or another coupon program shall be	chips, tokens, and/or another coupon program shall be approved by the		value, that can only be used to acquire non-cashable		
oved by the CNGC prior to implementation. If	Tribal gaming regulatory authority prior to implementation. If approved,		credits throung interaction with a voucher system. This		
oved, the gaming operation shall establish and	the gaming operation shall establish and comply with procedures that		does not include instruments such as printed advertising		
ly with procedures that account for and control such	account for and control such programs. 542.14(f)		material that cannot be validated directly by a voucher		
ams.			system.		
			543.18(h)(1) <i>Vouchers</i> . Controls must be established		
			and procedures implemented to:		
s, ov ov	and/or another coupon program shall be eed by the CNGC prior to implementation. If eed, the gaming operation shall establish and with procedures that account for and control such	chips, tokens, and/or another coupon program shall be chips, tokens, and/or another coupon program shall be approved by the chips tokens, and/or another coupon program shall be approved by the Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall establish and comply with procedures that account for and control such programs. 542.14(f)	Coupon standards. Any program for the exchange of coupons for chips, and/or another coupon program shall be chips, tokens, and/or another coupon program shall be approved by the CNGC prior to implementation. If the gaming operation shall establish and with procedures that account for and control such account for and control such programs. S42.14(f)	Coupon standards. Any program for the exchange of coupons for chips, and/or another coupon program shall be red by the CNGC prior to implementation. If each, the gaming operation shall establish and with procedures that account for and control such ms.  Coupon standards. Any program for the exchange of coupons for chips, tokens, and/or another coupon program shall be approved by the Chips, tokens, and/or another coupon program shall be approved by the Credits through interaction with a voucher system. This does not include instruments such as printed advertising material that cannot be validated directly by a voucher system.  543.2 Coupon. A financial instrument of fixed wagering value, that can only be used to acquire non-cashable credits through interaction with a voucher system. This does not include instruments such as printed advertising material that cannot be validated directly by a voucher system.  543.18(h)(1) Vouchers. Controls must be established	Coupon standards. Any program for the exchange of coupons for chips, and/or another coupon program shall be red by the CNGC prior to implementation. If the gaming operation shall establish and with procedures that account for and control such ms.  Coupon standards. Any program for the exchange of coupons for chips, tokens, and/or another coupon program shall be approved by the Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall establish and countrol such ms.  Coupon standards. Any program for the exchange of coupons for chips, tokens, and/or another coupon program shall be approved by the Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall establish and comply with procedures that account for and control such account for and control such programs. 542.14(f)  Tribal gaming operation shall establish and comply with procedures that account for and control such account for and control such programs. 542.14(f)  Tribal gaming operation shall establish and comply with procedures that account for and control such programs. 542.14(f)  Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall establish and comply with procedures that account for and control such programs. 542.14(f)  Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall establish and comply with procedures that account for and control such account for and control such programs. 542.14(f)  Tribal gaming regulatory authority prior to implementation. If approved, the gaming operation shall be approved by the credit strong interaction with a voucher system. This does not include instrument of fixed wagering value, that can only be used to acquire non-cashable credits through the credit strong interaction with a voucher system. This does not include instrument of fixed wagering value, that can only be used to acquire non-cashable credits through the credit strong interaction wit

Section 12 - Drop & C		542 General Standards 542.21 Tab	ble Games 542.31 Table Games	542.41 Table Games	542.21 Gaming Machines	542.31 Gaming Machines	542.41 Gaming Machines	NIGC Class III Guidance	543 General Standards	543 Card Games	543 Player Interfaces 543 Kiosks	Recommended Revisions
General Standards	Count							BULLETIN 2018-3 §12				
Supervision. Supervision must be								12(a) Supervision must be provided for drop and	Supervision. Supervision must be			Supervision. Supervision must be provided fo
drop and count as needed by an								count as needed by an agent(s) with authority equal to	provided for drop and count as needed			drop and count as needed by an agent(s) wi
authority equal to or greater than	an those being							or greater than those being supervised.	by an agent(s) with authority equal to or			authority equal to or greater than those bei
supervised.									greater than those being supervised. 543.17(a)			<del>supervised.</del>
	54:	42.21(a); 542.31(a); 542.41(a) <b>Computer</b>										
		pplications. For any computer										
		pplications utilized, alternate										
		ocumentation and/or procedures that rovide at least the level of control described										
		y the standards in this section, as approved										
		y the Tribal gaming regulatory authority,										
		ill be acceptable.										
Drop and Count Schedule												
All table games/card games drop					All bill acceptor canisters shall be	All bill acceptor canisters shall be	All bill acceptor canisters shall be	12(d)(4) All drop boxes may be removed only at the		All drop boxes may be removed only at		All table games/card games drop boxes and
financial instrument storage com					removed only at the time previously	removed only at the time previously	removed only at the time previously	time previously designated by the gaming operation		the time previously designated by the		financial casino instrument storage compon
be removed only at the time prev designated by the gaming operat					designated by the gaming operation and reported to the Tribal gaming	designated by the gaming operation and reported to the Tribal gaming	designated by the gaming operation and reported to the Tribal gaming	and reported to the TGRA. If an emergency drop is required, surveillance must be notified before the drop		gaming operation and reported to the TGRA. If an emergency drop is required,	gaming operation and reported to the	containers (CISC) may be removed only at the time previously designated by the gaming
reported to the CNGC. If an emer					regulatory authority, except for	regulatory authority, except for	regulatory authority, except for	is conducted and the TGRA must be informed within a			TGRA. If an emergency drop is required,	operation and reported to the CNGC. If an
required, surveillance must be no	notified before				emergency drops. 542.21(e)(2)	emergency drops. 542.31(e)(2)	emergency drops. 542.41(e)(2)	timeframe approved by the TGRA.		drop is conducted and the TGRA must	surveillance must be notified before the	emergency drop is required, surveillance mu
the drop is conducted and the CN										be informed within a timerframe	drop is conducted and the TGRA must	notified before the drop is conducted and the
informed within twenty-four hou	ours of the							12(e)(3) All financial instrument storage components		approved by the TGRA.	be informed within a timeframe	CNGC must be informed within twenty-four
emergency drop.								may be removed only at the time previously		543.17(d)(4)	approved by the TGRA. 543.17(e)(3)	A hours of the emergency drop.
								designated by the gaming operation and reported to the TGRA. If an emergency drop is required,			543.17(e)(3)	
								surveillance must be notified before the drop is				
								conducted and the TGRA must be informed within a				
								timeframe approved by the TGRA.				
Security Over the Drop and Coun	unt.											Security Over the Drop and Count
												В
Security shall be provided over the								(12)(e)(4)(i) Security must be provided for the			(12)(e)(4)(i) Security must be provided	Security shall be provided over the financial
instrument storage components a during the drop process.	s at all times							financial instrument storage components removed from gaming machines and awaiting transport to the			for the financial instrument storage components removed from gaming	instrument storage components CISC at all til during the drop process.
during the drop process.								count room.			machines and awaiting transport to the	during the drop process.
											count room.	
Surveillance of the Drop and Cou	ount.											c
Surveillance must be notified who			542.31(b)(6) Surveillance shall be	542.41(b)(6) Surveillance shall be		Surveillance shall be notified when the	Surveillance shall be notified when the	e 12(d)(1) Surveillance must be notified when the drop		Surveillance must be notified when the	Surveillance must be notified when the Surveillance must be notified prior to the	
to begin so that surveillance may												
activities.			notified when the drop is to begin so	notified when the drop is to begin so			drop is to begin so that surveillance ma	is to begin so that surveillance may monitor the			drop is to begin so that surveillance may financial instrument storage	
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	542 General Standards 542.21 Table Games	542.31 Table Games	542.41 Table Games	542.21 Gaming Machines	542.31 Gaming Machines	542.41 Gaming Machines	NIGC Class III Guidance	543 General Standards	543 Card Games	543 Player Interfaces	543 Kiosks Recommended Revisions
Controls must be established and procedures							12(b) Count room access. Controls must be		Access to the count room during the	Access to the count room during the	Controls must be established and procedures
implemented to limit access to the count							f established and procedures implemented to limit	established and procedures	count must be restricted to members of		implemented to limit physical access to the count
room/man trap during the count process to		members of the drop and count teams,	members of the drop and count teams, with the exception of authorized		the drop and count teams, with the	the drop and count teams, with the	physical access to the count room to count team agents, designated staff, and other authorized persons.		the drop and count teams, with the	the drop and count teams, with the	room/man trap during the count process to
members of the drop and count teams, authorized observers, supervisors for resolution	with the exception of authorized	with the exception of authorized observers, supervisors for resolution of		exception of authorized observers, supervisors for resolution of problems,	exception of authorized observers, supervisors for resolution of problems,	exception of authorized observers, supervisors for resolution of problems,	Such controls must include the following:		supervisors for resolution of problems,	exception of authorized observers, supervisors for resolution of problems,	members of the drop and count teams, authorized observers, supervisors for resolution
of problems, and authorized maintenance		problems, and authorized maintenance					Sacreonado mase medae die ionoving.		ne and authorized maintenance personnel.		of problems, and authorized maintenance
personnel.	personnel.	personnel.	personnel.	542.21(f)(2)	542.31(f)(2)	542.41(f)(2)	12(f)(3) Access to the count room during the count	following: 543.17(b)	543.17(f)(3)	543.17(g)(3)	personnel.
							must be restricted to members of the drop and count				
							teams, with the exception of authorized observers,				
1							supervisors for resolution of problems, and authorized				
							maintenance personnel.				
							12(g)(3) Access to the count room during the count				
							must be restricted to members of the drop and count teams, with the exception of authorized observers,				
							supervisors for resolution of problems, and authorized				
							maintenance personnel.				
Access to stored full financial instrument	542.21(d)(15) Access to stored, full	542.21(d)(15) Access to stored, full table	542.41(d)(15) Access to stored, full	Access to stored bill acceptor	Access to stored bill acceptor	Access to stored bill acceptor	12(f)(1) Gaming machine financial instrument count		Card room count standards. Access to	Player interface instrument count	Access to stored full financial instrument storage
storage components must be restricted to:	table game drop boxes shall be	game drop boxes shall be restricted to		canisters, full or empty, shall be	canisters, full or empty, shall be	canisters, full or empty, shall be	standards. Access to stored, full table game drop			standards. Access to stored full financial	components CISC must be restricted to:
		e authorized members of the drop and	restricted to authorized members of the	restricted to: 542.21(f)(11)	restricted to: 542.31(f)(11)	restricted to: 542.41(f)(11)	boxes must be restricted to:		be restricted to:	instrument storage components must be	
	drop and count teams.	count teams.	drop and count teams.						543.17(f)(1)	restricted to: 543.17(g)(1)	
							12(g)(1) Gaming machine financial instrument count				
							standards. Access to stored full financial instrument storage components must be restricted to:				
							storage components must be restricted to:				
2											
					1						
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Authorized members of the drop and count			542 41(d)(15) Access to stored, full	Authorized members of the drop and	Authorized members of the drop and	Authorized members of the drop and	12(f)(1)(i) Authorized members of the drop and count		Authorized members of the drop and	Authorized members of the drop and	Authorized members agents of the drop and
teams; and			table game drop boxes shall be	count teams; and 542.21(f)(11)(i)	count teams; and 542.31(f)(11)(i)	count teams; and 542.41(f)(11)(i)	teams; and		count teams; and	count teams; and	count teams; and
a			restricted to authorized members of the						543.17(f)(1)(i)	543.17(g)(1)(i)	
			drop and count teams.				12(g)(1)(I) Authorized members of the drop and count				
							teams: and				
In an emergency, authorized persons for the							12(f)(1)(ii) In an emergency, authorized persons for			In an emergency, authorized persons for	
resolution of a problem.				for resolution of problems. 542.21(f)(11)(i)(ii)	for resolution of problems. 542.31(f)(11)(i)(ii)	for resolution of problems. 542.41(f)(11)(i)(ii)	the resolution of a problem.		the resolution of a problem. 543.17(f)(1)(ii)	the resolution of a problem.	
				542.21(1)(11)(1)(11)	542.31(1)(11)(1)(11)	542.41(t)(11)(l)(ll)	12(g)(1)(ii) In an emergency, authorized persons for		543.17(T)(1)(II)	543.17(g)(1)(ii)	
							the resolution of a problem				
Extraneous Items and Count Room Standards.							12(b)(3) The count team policy, at a minimum, must	The count team policy, at a minimum,			Extraneous Items and Count Room Standards.
CNGC, or the gaming operation as approved by											
							address the transportation of extraneous items such as	must address the transportation of			CNGC, or the gaming operation as approved by
CNGC, shall establish and the gaming							personal belongings, tool boxes, beverage containers,	extraneous items such as personal			CNGC, shall establish and the gaming operation
operation shall comply with procedures to								extraneous items such as personal belongings, tool boxes, beverage			CNGC, shall establish and the gaming operation shall comply with procedures to address the
operation shall comply with procedures to address the transporting of extraneous items,							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10((i)(2) Limit the transportation of extraneous items	extraneous items such as personal belongings, tool boxes, beverage	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes,
operation shall comply with procedures to address the transporting of extraneous items,							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(i)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10((i)(2) Limit the transportation of extraneous items	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault.							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(i)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault.  12.2 Drop Standards							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(i)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	t		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault.  12.2 Drop Standards  A Table Games/Card Game Drop							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(0)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage.	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun			CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault.  12.2 Drop Standards  A Table Games/Card Game Drop Controls must be established and procedures							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(ii)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage.	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	Card game dropstandards. Controls		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
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operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, and/or boxes, into and out of the cage, coin room, count room, and/or vault.  12.2 Drop Standards  A Table Games/Card Game Drop  Controls must be established and procedures implemented to ensure security of the drop process. Such controls must include the							personal belongings, tool boxes, beverage containers, etc., into or out of the count room.  10(ii)(2) Limit the transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage.  12(d) Table game drop standards. Controls must be established and procedures implemented to ensure security of the drop process. Such controls must	extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the coun	Card game dropstandards. Controls must be established and procedures implemented to ensure security of the		CNGC, shall establish and the gaming operation shall comply with procedures to address the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into and out of the cage, coin room, count room,
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REF	542 General Standards 542.21 Table Games	542.31 Table Games	542.41 Table Games	542.21 Gaming Machines	542.31 Gaming Machines	542.41 Gaming Machines	NIGC Class III Guidance	543 General Standards	543 Card Games	543 Player Interfaces	543 Kiosks	Recommended Revisions
For any tables opened during the shift, a		A separate drop box shall be placed on				, , , , , , , , , , , , , , , , , , , ,	For any tables opened during the shift, a separate drop		or any tables opened during the shift, a			For any tables opened during the shift, a
separate drop box/financial instrument storage		each table opened at any time during					box must be placed on each table, or a gaming		separate drop box must be placed on			separate drop box/financial instrument storage
component must be placed on each table, or a		each shift or a gaming operation may					operation may utilize a single drop box with separate		each table, or a gaming operation may			component CISC must be placed on each table,
gaming operation may utilize a single drop box		utilize a single drop box with separate					openings and compartments for each shift; and		utilize a single drop box with separate			or a gaming operation may utilize a single drop
/ financial instrument storage component with	openings and compartments for each	openings and compartments for each	openings and compartments for each				12(d)(6)		openings and compartments for each			hov / financial instrument storage component
c separate openings and compartments for each	shift; and 542.21(b)(2)(ii)	shift; and 542.31(b)(2)(ii)	shift; and 542.41(b)(2)(ii)				12(0)(0)		shift; and 543.17(d)(5)(ii)			CISC with separate openings and compartments
shift; and	Silit, and 342.21(b)(2)(ii)	31111, and 342.31(b)(2)(ll)	31111, and 342.41(b)(2)(ii)					l l	init, and 343.17(d)(3)(ii)			for each shift; and
Still, allu												ior each shirt, and
Table Games/Card game drop boxes/financial	Upon removal from the tables, table	Upon removal from the tables, table	Upon removal from the tables, table				Table game drop boxes must be transported directly to		Card game drop boxes must be			Table Games/Card game drop boxes/financial
instrument storage components must be	game drop boxes shall be transported	game drop boxes shall be transported	game drop boxes shall be transported				the count room or other equivalently secure area by a		ransported directly to the count room			instrument storage components CISC must be
transported directly to the count room or other	directly to the count room or other	directly to the count room or other	directly to the count room or other				minimum of two agents, at least one of whom is		or other equivalently secure area by a			transported directly to the count room or other
equivalently secure area with comparable	equivalently secure area with	equivalently secure area with	equivalently secure area with				independent of the table game department, until the		minimum of two agents, at least one of			equivalently secure area with comparable
controls by a minimum of two agents, at least	comparable controls and locked in a	comparable controls and locked in a	comparable controls and locked in a				count takes place. 12(d)(7)		whom is independent of the card game			controls by a minimum of two agents, at least
d one of whom is independent of the card game	secure manner until the count takes	secure manner until the count takes	secure manner until the count takes				count takes place. 12(a)(7)		shift being dropped, until the count			one of whom is independent of the card game
shift being dropped, until the count takes place.	place. 542.21(b)(2)(iii)	place. 542.31(b)(2)(iii)	place. 542.41(b)(2)(iii)						akes place.			shift being dropped, until the count takes place.
	place. 342.21(b)(2)(lll)	piace. 342.51(b)(2)(iii)	piace. 342.41(b)(2)(iii)						543.17(d)(5)(iii)			
The drop boxes / financial instrument storage components shall be locked in a secure manner									145.17(U)(3)(III)			The drop boxes / financial instrument storage
												components CISC shall be locked in a secure
until the count takes place.												manner until the count takes place.
All tables that were not open during a shift and		If drop boxes are not placed on all					All tables that were not open during a shift and		All tables that were not open during a			All card tables that were not open during a shift
therefore not part of the drop must be	tables, then the pit department shall	tables, then the pit department shall	tables, then the pit department shall				therefore not part of the drop must be documented.		shift and therefore not part of the drop		6	and therefore not part of the drop must be
documented.	document which tables were open	document which tables were open	document which tables were open				12(d)(8)		must be documented. 543.17(d)(6)		, and the second	documented.
	during the shift 542 21(h)(3)	during the shift 542 31(h)(3)	during the shift 542 41(h)(3)									
All table game/card game drop boxes /	All table game drop boxes shall be	All table game drop boxes shall be					All table game drop boxes must be posted with a	1	All card game drop boxes must be			All table game/card game drop boxes / financial-
financial instrument storage components must		posted with a number corresponding to					number corresponding to a permanent number on the	l li	posted with a number corresponding to			instrument storage components-CISC must be
be posted with a number corresponding to a	a permanent number on the gaming	a permanent number on the gaming	a permanent number on the gaming				gaming table and marked to indicate game, table	Į li	permanent number on the gaming			posted with a number corresponding to a
6 permanent number on the gaming table and	table and marked to indicate game,	table and marked to indicate game,	table and marked to indicate game,				number, and shift, if applicable. 12(d)(9)	Į.	able and marked to indicate game,		7	permanent number on the gaming table and
marked to indicate game, table number, and	table number, and shift. 542.21(b)(5)	table number, and shift. 542.31(b)(5)	table number, and shift. 542.41(b)(5)						able number, and shift, if applicable.		l li	marked to indicate game, table number, and
shift, if applicable.								]:	543.17(d)(7)		]:	shift, if applicable.
If done have a filter what is	w	16 draw haves · · · · ·	16 draw haves · · · · · ·									If deap house / Engantal lands
If drop boxes / financial instrument storage		If drop boxes are not placed on all									] ]	If drop boxes / financial instrument storage-
components are not placed on all tables, then		tables, then the pit department shall									[	components CISC are not placed on all tables,
the pit department shall document which tables	document which tables were open	document which tables were open	document which tables were open									then the pit department shall document which
were open during the shift.	during the shift. 542.21(b)(3)	during the shift. 542.31(b)(3)	during the shift. 542.41(b)(3)									tables were open during the shift.
7											8	
Gaming Machines and Financial Instrument				Gaming machine bill acceptor drop	Gamina machine bill acceptor drop	Gamina machine bill acceptor drop	(e) Gaming machine and financial instrument storage					Gaming Machines and Financial Instrument
B Storage Component Drop				standards.	standards.	standards.	component drop standards.					Storage Component CISC Drop
For Tiers A and B gaming operations, at least							At least two agents must be involved in the removal of		At least two agents must be involved in	At least two agents must be involved in		For Tiers A and B gaming operations, at least two
two agents must be involved in the removal of				involved in the removal of the gaming			the gaming machine and financial instrument storage		he removal of the drop box. At least			agents must be involved in the
the gaming machine storage component drop,				machine drop, at least one of whom is		gaming machine drop, at least one of	component drop, at least one of whom is independent			storage component drop, at least one of		removal/transportation of the gaming machine
at least one of whom is independent of the				independent of the gaming machine	independent of the gaming machine	whom is independent of the gaming	of the gaming machine department. 12(e)(2)		games department. 543.17(d)(2)	whom is independent of the player		storage <del>component</del> container drop, at least one
gaming machine department. For Tier C				department. 542.21(e)(1)	department. 542.31(e)(1)	machine department. 542.41(e)(1)				interface department. 543.17(e)(2)		of whom is independent of the gaming machine
gaming operations, a minimum of three												department. For Tier C gaming operations, a
employees shall be involved in the removal of												minimum of three <del>employees</del> agents shall be
the gaming machine drop, at least one of who												involved in the removal of the gaming machine
is independent of the gaming machine												drop, at least one of who is independent of the
department.											!	gaming machine department.
The financial instrument storage components	The bill acceptor canisters shall be			The bill acceptor canisters shall be	The bill acceptor canisters shall be	The bill acceptor canisters shall be	The financial instrument storage components must be			The financial instrument storage		The financial instrument storage components
must be removed by an agent independent of	removed by a person independent of			removed by a person independent of	removed by a person independent of	removed by a person independent of	removed by an agent independent of the gaming			components must be removed by an		CISC must be removed by an agent independent
the gaming machine department, then	the gaming machine department then				the gaming machine department then	the gaming machine department then				agent independent of the player		of the gaming machine department, then
transported directly to the count room or other	transported directly to the count room					transported directly to the count room				interface department, then transported		transported directly to the count room or other
2 equivalently secure area with comparable	or other equivalently secure area with			or other equivalently secure area with	or other equivalently secure area with	or other equivalently secure area with	comparable controls and locked in a secure manner			directly to the count room or other		equivalently secure area with comparable
controls and locked in a secure manner until	comparable controls and locked in a			comparable controls and locked in a	comparable controls and locked in a	comparable controls and locked in a	until the count takes place. 12(e)(4)			equivalently secure area with		controls and locked in a secure manner until the
the count takes place.	secure manner until the count takes			secure manner until the count takes	secure manner until the count takes	secure manner until the count takes				comparable controls and loacked in a		count takes place.
	place. 542.21(e)(3)			place. 542.21(e)(3)	place. 542.31(e)(4)	place. 542.41(e)(4)				secure manner until the count takes		
Security must be provided for the financial	Security shall be provided over the bill			Security shall be provided over the bill	Security shall be provided over the bill	Security shall be provided over the bill	Security must be provided for the financial instrument			Security must be provided for the		Security must be provided for the financial
instrument storage components removed from	acceptor canisters removed from the			acceptor canisters removed from the	acceptor canisters removed from the	acceptor canisters removed from the	storage components removed from gaming machines			financial instrument storage		instrument storage components removed from-
player interfaces and awaiting transport to the	gaming machines and awaiting			gaming machines and awaiting	gaming machines and awaiting	gaming machines and awaiting	and awaiting transport to the count room. 12(e)(4)(i)			components removed from player		player interfaces and awaiting transport to the
count room.	transport to the count room.			transport to the count room.	transport to the count room.	transport to the count room.				interfaces and awaiting transport to the		count room.
	542.21(e)(3)(i)			542.21(e)(3)(i)	542.31(e)(4)(i)	543.41(e)(4)(i)				count room. 543.17(e)(4)(i)		
3												
	Security shall be provided over the											
	buckets removed from the gaming											
	machine drop cabinets and awaiting											
	transport to the count room.											
Transportation of financial instrument storage	The transporting of bill acceptor	1	1	The transporting of bill acceptor	The transporting of bill acceptor	The transporting of bill acceptor	Transportation of financial instrument storage			Transportation of financial instrument		Transportation of financial instrument storage
components must be performed by a minimum	canisters shall be performed by a			canisters shall be performed by a	canisters shall be performed by a	canisters shall be performed by a	components must be performed by a minimum of two			storage components must be performed		components must be performed by a minimum
of two agents, at least one of whom is	minimum of two persons, at least one of						f agents, at least one of whom is independent of the			by a minimum of two agents, at least		of two agents, at least one of whom is
4 independent of the player interface	whom is independent of the gaming	.					gaming machine department. 12(e)(4)(ii)	1		one of whom is independent of the		or two agents, at least one or whom is independent of the player interface department.
department.	machine department. 542.21(e)(3)(ii)			whom is independent of the gaming machine department. 542.21(e)(3)(ii)	whom is independent of the gaming machine department. 542.31(e)(4)(ii)	whom is independent of the gaming machine department. 542.41(e)(4)(ii)	garning machine department. 12(e)(4)(ii)			player interface department.		independent of the player interface department.
department.	machine department. 342.21(e)(3)(ll)			macrine department. 342.21(e)(3)(II)						543.17(e)(4)(ii)		
		<u> </u>	<u> </u>	<u> </u>	<u> </u>		<u> </u>					
All financial instrument storage components	All bill acceptor canisters shall be poste	1		All bill acceptor canisters shall be	All bill acceptor canisters shall be	All bill acceptor canisters shall be	All financial instrument storage components must be		-	All financial instrument storage		All financial instrument storage components CISC
must be posted with a number corresponding	with a number corresponding to a						posted with a number corresponding to a permanent			components must be posted with a	],	must be posted with a number corresponding to
5 to a permanent number on the player interface.	permanent number on the gaming			a permanent number on the gaming	a permanent number on the gaming	a permanent number on the gaming	number on the gaming machine. 12(e)(5)			number corresponding to a permanent		a permanent number on the player interface.
	machine. 542.21(e)(4)			machine. 542.21(e)(4)	machine. 542.31(e)(5)	machine. 542.41(e)(5)				number on the player interface.		
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	i .				***				543 17(a)(5)		
			1 542.41									
12.3 Count Standards	542.2	542.3	542.41		II.	1	Count team. Controls must be established and	Count Team. Controls must be				
Controls must be established and procedures	542.2	1 542.3:	542.41									
Controls must be established and procedures implemented to ensure the security of the	542.2	1 542.3:	542.41				procedures implemented to ensure security of the	established and procedures				
Controls must be established and procedures implemented to ensure the security of the count and the count room to prevent	542.2	1 542.3	1 542.41				count and the count room to prevent unauthorized	established and procedures implemented to ensure security of the				
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,	542.2	542.3:	342.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or	established and procedures implemented to ensure security of the count and the count room to prevent				
Controls must be established and procedures implemented to ensure the security of the count and the count room to prevent	542.2	542.3:	342.43				count and the count room to prevent unauthorized	established and procedures implemented to ensure security of the count and the count room to prevent				
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,	542.2	542.3	342.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such				
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,	542.2	542.3	542.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation				
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.	542.2	542.3	342.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such				
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			314.43				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 542-17(c)				
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 For instances in which the number of count	The table game soft count and	The table game soft count and	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following:				For instances in which the number of count team
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 For instances in which the number of count team members refer to three (3) employees,	The table game soft count and gaming machine bill acceptor count	The table game soft count and gaming machine bill acceptor count	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following:				members agents refer to three (3) employees-
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 For instances in which the number of count	The table game soft count and	The table game soft count and	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following:				
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 For instances in which the number of count team members refer to three (3) employees,	The table game soft count and gaming machine bill acceptor count	The table game soft count and gaming machine bill acceptor count	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following:				members agents refer to three (3) employees
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 642 3174.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts				members agents refer to three (3) employees agents, Tier A and B gaming operations may
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 For instances in which the number of count team members refer to three (3) employees, Tier A and 8 gaming operations may utilize two	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and 8 operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forger, theft, or fraud. Such contols must include the following: 523.17(c).  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)  For Tier A and B operations, at no time during the	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 524.317c/.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 543.17(c)(1)				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the drop proceeds have been accepted into
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)  For Tier A and B operations, at no time during the count can there be fewer than two count team agents	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 524.317c/.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 543.17(c)(1)				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the drop proceeds have been accepted into
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.43				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)  For Tier A and B operations, at no time during the count can there be fewer than two count team agents in the count room until the drop proceeds have been	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 524.317c/.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 543.17(c)(1)				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the drop proceeds have been accepted into
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)  For Tier A and B operations, at no time during the count can there be fewer than two count team agents	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 524.317c/.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 543.17(c)(1)				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the drop proceeds have been accepted into
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 For instances in which the number of count team members refer to three (3) employees, Tier A and B gaming operations may utilize two (2) employee as provided for in the gaming	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	The table game soft count and gaming machine bill acceptor count shall be performed by a minimum of	314.41				count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such controls must include the following: 12(c)  For Tier A and B operations, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 12(c)(1)  For Tier A and B operations, at no time during the count can there be fewer than two count team agents in the count room until the drop proceeds have been	established and procedures implemented to ensure security of the count and the count room to prevent unauthorized access, misappropriation of funds, forgery, theft, or fraud. Such contols must include the following: 524.317c/.  For Tier A and B operation, all counts must be performed by at least two agents. For Tier C operations, all counts must be performed by at least three agents. 543.17(c)(1)				members agents refer to three (3) employees- agents, Tier A and B gaming operations may utilize two (2) employees agents with no fewer than two (2) agents in the count room until the drop proceeds have been accepted into cage/vault accountability, as provided for in the

		<del></del>											
REF For Tier C gaming operations, all counts must	542 General Standards	542.21 Table Games	542.31 Table Games	542.41 Table Games The table game soft count and	542.21 Gaming Machines	542.31 Gaming Machines	542.41 Gaming Machines	NIGC Class III Guidance For Tier C operations, all counts must be performed by	543 General Standards For Tier A and B operations, at no time	543 Card Games	543 Player Interfaces	543 Kiosks	Recommended Revisions For Tier C gaming operations, all counts must be
be performed by a minimum of three (3)				gaming machine bill acceptor count				at least three agents. 12(c)(1)	during the count can there be fewer				performed by a minimum of three (3) employees
employees and no fewer than three (3)				shall be performed by a minimum of					than two count team agents in the				agents and no fewer than three (3) employees
employees may be in the count room until the drop proceeds have been accepted into				three employees. 542.41(c)(1)				For Tier C operations, at no time during the count can there be fewer than three count team agents in the	have been accepted into cage/vault				agents may be in the count room until the drop proceeds have been accepted into cage/vault
2 cage/vault accountability.								count room until the drop proceeds have been	accountability. For Tier C operations, at				accountability.
								accepted into cage/vault accountability. 12(c)(2)	no time during the count can there be fewer than three count team agents in				
									the count room until the drop proceeds				
									hav been accepted into cage/vault				
									accountability. 543.17(c)(2)				
Count room personnel are not allowed to exit or enter the count room during the count								Count team agents may not exit or enter the count room during the count except for emergencies or					Count room personnel are not allowed to exit or
3 except for emergencies or scheduled breaks.								scheduled breaks. 12(b)(1)					emergencies or scheduled breaks. Surveillance
Surveillance must be notified of each time.													must be notified of each time.
Count team members must be rotated on a	Count team members shall be rotated on a	1						For Tier A and B operations, count team agents must	For Tier A and B operations, count team				For Tier A and B operations, count team agents
routine basis such that the count team is not		t						be rotated on a routine basis such that the count team					must be rotated on a routine basis such that the
consistently the same three (3) persons more than four (4) days per week. This standard shal								is not consistently the same two agents more than four days per week. This standard does not apply to	basis such that the count team is not consistently the same two agents more				count team is not consistently the same two agents more than four days per week. This
not apply to gaming operations that utilize	shall not apply to gaming operations that							gaming operations that utilize a count team of more	than four days per week. This standard				standard does not apply to gaming operations
more than three persons on the count team.	utilize a count team of more than two persons. 542.21(c)(3)							than two agents. For Tier C operations, count team agents must be rotated on a routine basis such that	does not apply to gaming operations that utilize a count team of more than				that utilize a count team of more than two agents. For Tier C operations, Count team
	persons. 312.21(c)(3)							the count team is not consistently the same three	two agents. For Tier C operations, Cour	t			members must be rotated on a routine basis
	Count team members shall be rotated on a							agents more than four days per week. This standard	team agents must be rotated on a				such that the count team is not consistently the
	routine basis such that the count team is not consistently the same two persons more	1						does not apply to gaming operations that utilize a count team of more than three agents. 12(c)(3)	routine basis such that the count team in not consistently the same three (3)	S			same three (3) persons agents more than four (4) days per week. This standard shall not apply to
4	than four (4) days per week. This standard							, J	agents more than four (4) days per				gaming operations that utilize more than three
	shall not apply to gaming operations that utilize a count team of more than two								week. This standard shall not apply to gaming operations that utilize a count				persons agents on the count team.
	persons. 542.31(c)(3)								team of more than three agents.				
									543.17(c)(3)				
	Count team members shall be rotated on a routine basis such that the count team is not												
	consistently the same three persons more												
	than four (4) days per week. This standard												
	shall not apply to gaming operations that utilize a count team of more than three												
	persons. 542.41(c)(3)												
Functions performed by the count team	+							Functions performed by count team agents must be	Functions performed by the count team				Functions performed by the count team
5 members must be rotated on a routine basis.								rotated on a routine basis. 12(c)(4)	members must be rotated on a routine				4 members agents must be rotated on a routine
Count team agents must be independent of th	e The count team shall be independent of							Count team agents must be independent of the	basis. 543.17(c)(4) Count team agents must be	+			basis.  Count team agents must be independent of the
department being reviewed and counted A	transactions being reviewed and counted.							department being counted. A cage/vault agent may b	independent of the department being				department being reviewed and counted and
	The count team shall be independent of the							used if they are not the sole recorder of the count and					independent of the cage/vault department. A
the sole recorder of the count and do not participate in the transfer of drop proceeds to	cage/vault departments, however, a dealer o a cage cashier may be used if this person is	r						do not participate in the transfer of drop proceeds to the cage/vault. An accounting agent may be used if	the count and do not participate in the				cage cashier <del>/vault agent</del> may be used if they are not the sole recorder of the count and do not
the cage/vault. An accounting agent may be	not allowed to perform the recording							there is an independent audit of all count	transfer of drop proceeds to the				participate in the transfer of drop proceeds to the
used if there is an independent audit of all count documentation.	function. An accounting representative may be used if there is an independent audit of							documentation. 12(c)(5)	cage/vault. An accounting agent may bused if there is an independent audit of				cage/vault. An accounting agent may be used if there is an independent audit of all count
count documentation.	all soft count documentation. 542.21(c)(4);								all count documentation. 543.17(c)(5)				documentation.
6	542.31(c)(4)												5
	The count team shall be independent of												
	transactions being reviewed and counted.												
	The count team shall be independent of the cage/vault departments, however, an												
	accounting representative may be used if												
	there is an independent audit of all soft												
	count documentation. 542.41(c)(4)												
The Table Game/Cards and financial instrumen		Table game soft count standards.	Table game soft count standards.	Table game soft count standards.				The table game count must be performed in a count		The card game count must be	The player interface financial instrument		The Table Game/Cards/Kiosk and casino
storage component count must be performed in a designated count room or other		The table game soft count shall be performed in a soft count room or other	The table game soft count shall be performed in a soft count room or other	The table game soft count shall be performed in a soft count room or other			a acceptor count shall be performed in a	room or other equivalently secure area with comparable controls. 12(f)(2)		performed in a count room or other equivalently secure area with	count must be performed in a count room or other equivalently secure area		financial instrument storage container component All counts must be performed in a
B equivalently secure area with comparable		equivalently secure area with	equivalently secure area with	equivalently secure area with	soft count room or other equivalently	soft count room or other equivalently	soft count room or other equivalently			comparable controls. 543.17(f)(2)	with comparable controls. 543.17(g)(2)		designated count room or other equivalently
controls.		comparable controls. 542.21(d)(1)	comparable controls. 542.31(d)(1)	comparable controls. 542.41(d)(1)	secure area with comparable controls. 542.21(f)(1)	secure area with comparable controls. 542.31(f)(1)	secure area with comparable controls. 542.41(f)(1)	The gaming machine financial instrument count must be performed in a count room or other equivalently					secure area with comparable controls.
					342.21(1)(1)	342.31(1)(1)	342.41(1)(1)	secure area with comparable controls. 12(g)(2)					
Count equipment and systems must be tested,	+		+					Count equipment and systems must be tested, with		Count equipment and systems must be	Count equipment and systems must be		
with the results documented, at minimum								the results documented, before the first count begins,		tested, with the results documented, at	tested, and the results documented,		
before the first count begins to ensure the accuracy of the equipment.								to ensure the accuracy of the equipment. 12(f)(5)		minimum before the first count begins to ensure the accuracy of the	before the first count begins to ensure the accuracy of the equipment.		
C C accuracy of the equipment.								Count equipment and systems must be tested, and th	2	equipment. 543.17(f)(5)	543.17(g)(6)		
								results documented, before the first					
								count begins, to ensure the accuracy of the equipment. 12(g)(6)					
If county from various sources			1							1	16	If counts from various	
		If counts from various	rs If counts from various	If counts from various	If counts from various	If counts from various	If counts from various	* * * *		If counts from various revenue continu			
If counts from various revenue centers and kiosks occur simultaneously in the count room,		If counts from various revenue center occur simultaneously in the count room	rs If counts from various revenue ,, centers occur simultaneously in the	If counts from various revenue centers occur simultaneously in the	If counts from various revenue centers occur simultaneously in the	If counts from various revenue centers occur simultaneously in the	If counts from various revenue centers occur simultaneously in the	If counts from various revenue centers occur simultaneously in the count room, procedures must b		If counts from various revenue centers occur simultaneously in the count room,	occur simultaneously in the count room,		
kiosks occur simultaneously in the count room, procedures shall be in effect that prevent the		occur simultaneously in the count room procedures shall be in effect that	o, centers occur simultaneously in the count room, procedures shall be in	centers occur simultaneously in the count room, procedures shall be in	centers occur simultaneously in the count room, procedures shall be in	centers occur simultaneously in the count room, procedures shall be in	centers occur simultaneously in the count room, procedures shall be in effec	If counts from various revenue centers occur simultaneously in the count room, procedures must be tin effect to prevent the commingling of funds from		occur simultaneously in the count room, procedures must be in effect that	occur simultaneously in the count room, procedures must be in effect that	and kiosks occur simultaneously in the count room, procedures must be in	
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kiosks occur simultaneously in the count room, procedures shall be in effect that prevent the		occur simultaneously in the count room procedures shall be in effect that prevent the commingling of funds from	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.	If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers. 12(f)(4) If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers. 12(g)(4)		occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from	occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from	and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue	
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S42.41(d)(3)  The table game drop boxes shall be individually emptied and counted in such a manner to prevent the commingling of funds between boxes until the count of the box has been	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers. 542.21(f)(3)  The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canister until the count of the canister has been until the count of the canister has been full the count of the canister has been considered.	centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers. 542.31(f)(3)  The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the commingling of funds between canist until the count of the canister has been considered in the counter of the canister has been considered in the counter of the canister has been considered in the counter of the canister has been countered in the counter of the canister has been considered in the counter of the canister has been considered in the counter of the canister has been considered in the counter of the canister has been considered in the counter of the counter of the canister of the counter of the canister of the counter of the canister of the counter of the counter of the canister of the counter of the canister of the counter of the canister of the caniste	centers occur simultaneously in the count room, procedures shall be in effect that prevent the comminging of funds from different revenue centers. \$42.41(f)(3)  The bill acceptor canisters shall be individually emptied and counted in such a manner to prevent the ses commingling of funds between canister until the count of the canister has been until the count of the canister has been	If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers. 12(f)(4)  If counts from various revenue centers occur simultaneously in the count room, procedures must be in effect to prevent the commingling of funds from different revenue centers. 12(g)(4)  If counts from various revenue centers and kiosks occur simultaneously in the count room, procedures must be in effect to pretent the commingling of funds from different revenue centers. 12(g)(4)  If counts from various revenue centers and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue centers. The table game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the box has been recorded. 12(f)(6)  The financial instrument storage components must be individually emptied and counted so as to prevent the commingling of funds between storage components until the count of the storage components until the count of the storage components and currency cassettes must be individually emptied and counted so as to prevent the commingling of and counted so as to prevent the commingling of and counted so as to prevent the commingling of and counted so as to prevent the commingling of and counted so as to prevent the commingling of and counted so as to prevent the commingling of		occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from different revenue centers. 543.17(f)(4)  The card game drop boxes must be individually emptied and counted so as to prevent the commingling of funds between boxes until the count of the	occur simultaneously in the count room, procedures must be in effect that prevent the comminging of funds from different revenue centers. 543.17(g)(4)  The financial instrument storage components must be individually empited and counted so as to prevent the commingling of funds between storage components built the count of the storage component built the count of the storage component sheen	and kiosks occur simultaneously in the count room, procedures must be in effect that prevent the commingling of funds from the kiosks with any revenue	instrument storage components, kiosk and financial instrument storage-must be individually emptied and counted in such a manner as to prevent the commingling of funds between containers and kioske until the contents have been recorded. The count of each container shall

Comment of the region of the comment	F	542 General Standards 542.21 Table Games	542.31 Table Games	542.41 Table Games	542.21 Gaming Machines	542.31 Gaming Machines	542.41 Gaming Machines	NIGC Class III Guidance 543 General Standards	543 Card Games	543 Player Interfaces	543 Kiosks	Recommended Revisions
The content of the	The count of each Table Game/Cards drop	The count of each box shall be recorded	The count of each box shall be recorded	The count of each box shall be recorded	The count of each canister shall be	The count of each canister shall be	The count of each canister shall be	The count of each box must be recorded in ink or	The count of each box must be recorded	The count of each storage component	The count of each box must be recorded	The count of each Table Game/Cards drop
### CONTRACT OF CO								other permanent form of recordation. 12(f)(b)(i)				kiosk and financial instrument storage
Part	storage component and must be recorded in		(7,7,7)			(,,,,,,	, , , , , , , , , , , , , , , , , , ,				,,,,,	components CISC must be recorded in ink o
And the second s	ink or other permanent form of recordation.											other permanent form of recordation.
And the second control of the second control								Tecordation: 12(g)(8)(i)				
Separation of the control of the con												
Service for the property of th												
with the first cardinal properties and the properti								12(i)(4)(i)				
Process   Proc	A second count must be performed by a	A second count shall be performed by	A second count shall be performed by	A second count shall be performed by				For counts that do not utilize a currency counter, a	For counts that do not utilize a currency			For counts that do not utilize a currency count
Manual Continue of the Conti												A a second count must be performed by an
The state of the s												agent member of the count team who did not perform the initial count. Separate counts of
A CANADA									count. Separate counts of chips and			chips and tokens must always be performed b
Particular of the following of the follo												members agents of the count team.
From Control C	15							Course and the second and the second is should be	E 43 17(B)(C)(E)	C	Comments	W
A control of the cont												If currency counters are utilized a count team member agent must observe the loading and
Belle and the second of the se	unloading of all currency at the currency								recorded on a supplemental document	recorded on a supplemental document		unloading of all currency at the currency coun
A	counter, including rejected currency.									1		including rejected currency.
Wilson and the second of the s									coupons must be cancelled daily by an	coupons must be cancelled daily by an	authorized agent to prevent improper	
The second of th								Coupons or other promotional items not included in			recirculation. 543.17(i)(4)(ii)	
Service of the control of the contro										(g)(e)(i)		
And the second of the second o												
Address of the control of the contro												
Part												
Part								Coupons or other promotional items not included in				
Particular production of the control								gross revenue (if any) may be recorded on a				
Address of an experiment of the control of the cont												
Many years a large of the company of												
Many manufactures and the second of the seco												
Many of the control o	Procedures must be implemented to ensure	Corrections to information originally	Corrections to information originally	Corrections to information originally	Corrections to information originally	Corrections to information originally	Corrections to information originally	Procedures must be implemented to ensure that any	Procedures must be implemented to	Procedures must be implemented to	Procedures must be implemented	Procedures must be implemented to ensure that
See a serie from the management of the second series of the second serie	that any corrections to the count	recorded by the count team on soft	recorded by the count team on soft	recorded by the count team on soft	recorded by the count team on soft	recorded by the count team on soft		corrections to the count documentation are	ensure that any corrections to the count	ensure that any corrections to the count	to ensure that any corrections to the	any corrections to the count documentation are
Service of the following of the composition of the												permanent and identifiable, and that the original corrected information remains legible.
And the second control product of th	remains legible. Corrections must be verified by	writing the correct figure above the	writing the correct figure above the	writing the correct figure above the	writing the correct figure above the	writing the correct figure above the	writing the correct figure above the		corrected information remains legible.	corrected information remains legible.	information remains legible. Corrections	Corrections must be verified by two (2) count
white the first production of the company of the co								Procedures must be implemented to ensure that any				team members agents. Corrections to information originally recorded by the count
Control of the second control of the secon									count team agents. 545.17(1)(10)	count team agents. 343.17(g)(12)	343.17()(3)	team on soft count documentation shall be made
Part of the consequence of the part of the consequence of the part of the consequence of the part of												by drawing a single line through the error,
A service of extraction of the control of the contr					542.21(T)(4)(II)	542.31(f)(4)(II)	542.41(1)(4)(II)					writing the correct figure above the original figure, and then obtaining the initials of at least
Part   Section   Part	at least two count team members who verified											two count team members agents who verified
Part services in 1886 of 15 in	the change.											the change.
Particularies in the state of								permanent, identifiable and the original, corrected				
Second continues of the continue of the cont												
The control follower following and provided to the following and the control follower following and the control follower								vermed by two count team agents. 12(7(5)				
Control of the Policy of the Control of the Contr	If currency counters are utilized a count team	If such soundary are utilized and the	If surrounce countries are utilized and	If summer soundary are utilized and	If each countains are utilized and the	If anymous sometons are utilized and	If aurenau accombana and utilized and	We appear of a patent of a patent of a second team.	If currency counters are utilized a count	If currency counters are utilized a count		If currency counters are utilized a count team
Les and an infrared and service of the country.  The service of the country of th												member agent must observe the loading and
A control processed particular pa												unloading of all currency at the currency counter
Residual for an international position. We shall	counter, including rejected currency.											including rejected currency.
Second of the context prignated by the conte		the cash counter, including rejected	currency at the currency counter,	currency at the currency counter,	unloading of all cash at the cash	unloading of all currency at the currency	y currency at the currency counter,	If currency counters are utilized, a count team member		, , , , , , , , , , , , , , , , , , , ,		
Assessment of the conversy general by the control of the control o		cash. 542.21(d)(5)	including rejected currency. 542.31(d)(5				including rejected currency. 542.41(f)(5					
and the recording contract the recording of ratios, and a not to great the recording of recording and the recording a					()(0)	(//-/						
In the control compose control compose control control compose control												Two counts of the currency rejected by the
In principal control, must be protected from the came of must be protected. The principal control cont												currency counter must be recorded per CISC casino instrument storage container, as well as i
In clarical.  In this grant day bear, when many, that is grant day bear, the count tank to an indicate the count tank to an in												total. Rejected currency must be posted to the
Les this prestrain day to an affirmation of the prestrain								The second of th	is prohibited. 543.17(f)(8)			CISC casino instrument storage container from which it was collected.
Faile game drop boars, when empty, and all or down to avoide member of the count to approximate the major composers, when empty, and all or down to avoide member of the count to approximate the	conected.									collected. 343.17(g)(10)		which it was collected.
The plane days because, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not training or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not containing or composent, when empty, and it is not contained in containing the court is not contained and contained in containing the court.  If a containing or composed is a strictle proposed or containing or compos												
Mail of a form to another member of the count tawn (as a form to another member of the count tawn) (as a form to another to a	Each table assessment to the second s		Table accordance (	Table and done to	Contation when an in the Contation of	Continuo orbino di 1911	Contains when a second second	12(4)(10)	Continue to a 1	C		Substitute and the state of the
metal between the members of the court of a validation provided by a member of the court of a validation provided by the co												Each table games/cards drop box and financial- instrument storage component CISC, when
werelinese, gooded that the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by an agent independent of the count. \$2,21(0)(0) \$ the count is monitored in its enterty by a	must be shown to another count team member,	the count team, or to another person	the count team, or to another person	the count team, or to another person	or to another person who is observing	to another person who is observing the	to another person who is observing the	agent observing the count, or to surveillance, provided	the count team, to another agent	count team, to another agent who is		empty, must be shown to another count team
monitored in the entirety by a person independent of the count.    For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the count.   For deep proceeds from table games, the following transfer of the transfer of the formation of the dark transfer of the formation of the formati												member, to another agent who is observing the count, or to surveillance, provided that the cour
For drop proceeds from table games, the followers startletent shall account shared to the followers startletent shall be matched to the followers shall be matched t	monitored in its entirety by an agent		monitored in its entirety by a person	monitored in its entirety by a person		a person independent of the count.	a person independent of the count.		in its entirety by an agent	in its entirety by an agent		is monitored in its entirety by an agent
by the count of the count processed first table genes. The following standards shall acrop:  Orders for fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the following the marked to the fill/credit (if applicable) Management of the count is marked to the following the marked to the fill/credit (if applicable) Management of the count is marked to the fill/credit (if applicable) Management of the count is marked to the following the fill applicable is marked to the following the fill applicable is marked to the following the fill applicable is marked to the following the fill a	independent of the count.		indpendent of the count. 542.41(d)(6)	indpendent of the count. 542.41(d)(6)		542.31(f)(6)	542.41(f)(6)		independent of the count. 543.17(f)(9)			independent of the count.
For drop proceds from table games, the following standards: shall applicable) must be matched to the fill/credit (if applicable) and be treaded to or recorded on the count sheet shall be traced to										3.3.27(g)(11)		
For drop proceeds from table games, the following standards: shall active.  Orders for fill/credit (if applicable) shall be matched to the fill/credit sign. Fills and credits shall be matched to the fill/credit sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits shall be matched to the fill/credit sign. Fill and credits shall be matched to the fill/cre												
Orders for fill/credit (if applicable) matched to the fill/credit sign. fills and credits shall be matched to the fill/credit sign. shall be matched to the								independent of the count. 12(g)(11)				
Orders for fill/credit (if applicable) must be matched to the fill/credit shall be matched to the fount shall be matched to the fill/credit shall be matched to the fill/credi												
matched to the fill/credit signs. Fills and credits shall be traced to or recorded on the count sheet.  Fill and credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on the count sheet.  Fill sand credits shall be traced to or recorded on t		Orders for fill/credit (if applicable)	Orders for fill/credit (if applicable)	Orders for fill/credit (if annlicable)				Orders for fill/credit, if applicable, shall be matched to				
sheet.    seconded on the count sheet.   seconded on the seconder sheet.   seconded on the count sheet.   seconder sheet.   se	matched to the fill/credit slips. Fills and credits	shall be matched to the fill/credit slips.	shall be matched to the fill/credit slips.	shall be matched to the fill/credit slips.				the fill/credit slips. Fills and credits shall be traced to or				
Pit marker issue and payment slips (if printed issue and payment slips (if applicable) removed from the table game drop boxes shall either be: shall either be: s122 (1d/R)  Traced to or recorded on the count sheet by the count team; or sheet by the count team; or s122 (1d/R)  Totaled by shift and traced to the totals documented by the computerized system. Accounting personnel shall expersionel shall every first marker issue and payment slips (if printed issu	shall be traced to or recorded on the count							recorded on the count sheet. 12(f)(9)(a)				
applicable) removed from the table game drop boxes shall either be: saz 21/di(NB)  Traced to or recorded on the count sheet by the count team; or saz 21/di(NB)  Totaled by shift and traced to the totals documented by the computerized system. Accounting personnel shall either by system. Accounting personnel shall system. Accountin	andt.	542 21(HVT)	542 21(4)(7)	54241(4)(7)								
box/ financial instrument storage component shall either be: shall either be: First or recorded on the count sheet by first or recorded on the count tam; or sheet by the count team; or sez-21(d)(8)(10)(10)(10)(10)(10)(10)(10)(10)(10)(10												Pit marker issue and payment slips (if applicable removed from the CISC table game drop box /
Traced to or recorded on the count sheet by  Traced to or recorded on the count  Traced to or recorded on the count  Sheet by the count team; or  S42 21(0)(8)(0)  Totaled by shift and traced to the totals  documented by the computerized system.  Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall  System. Accounting personnel shall	box / financial instrument storage component	game drop boxes shall either be:	game drop boxes shall either be:	game drop boxes shall either be:								financial instrument storage component shall
a the count team; or  sheet by the count team								Traced to or recorded on the count sheet by the count				either be:
Totaled by shift and traced to the totals documented by the computerized system. Accounting personnel shall system. Accou			sheet by the count team; or	sheet by the count team; or								
documented by the computerized system.  documented by the computerized system. Accounting personnel shall verify the  documented by the computerized documented by the computerized system. Accounting personnel shall system. Account syst	Totaled by shift and traced to the totals	542.21(d)(8)(i)   Totaled by shift and traced to the totals	J 12.J2(0)(0)(1)					Totaled by shift and traced to the totals documented				
	documented by the computerized system.	documented by the computerized	documented by the computerized	documented by the computerized								
	Accounting personnel shall verify the issue/payment slip for each table is accurate.	system. Accounting personnel shall verify the issue/payment slip for each	system. Accounting personnel shall verify the issue/payment slip for each	system. Accounting personnel shall verify the issue/payment slip for each				Accounting personnel shall verify the issue/payment				
starty for each stable is accurate. 12(f)(6)(6)(1) table is accurate 12(f)(6)(6)(1) table is accura	sup for each table is accurate.											

REF 542 General Sta	ndards 542.21 Table Games 542.31 Table Games 542.41 Table Games 542.21 Gaming Machines	542.31 Gaming Machines 542.41 Gaming Machines NIGC Class III Guidance	543 General Standards 543 Card Games 543 Player Interfaces	543 Kiosks Recommended Revisions
Foreign currency exchange forms (if applicable)	Foreign currency exchange forms (if Foreign currency exchange forms (if Foreign currency exchange forms (if	g Suite and a suite and	Julio	Foreign currency exchange forms (if applicable)
removed from the table game drop boxes /	applicable) removed from the table applicable) removed from the table applicable) removed from the table			removed from the table game drop boxes /-
financial instrument storage components shall	game drop boxes shall be reviewed for game drop boxes shall be reviewed for			financial instrument storage components CISC
be reviewed for the proper daily exchange rate	proper daily exchange rate and the proper daily exchange rate and the			shall be reviewed for the proper daily exchange
and the conversion amount shall be	conversion aount shall be recomputed conversion amount shall be recomputed conversion aount shall be recomputed			rate and the conversion amount shall be
recomputed by the count team. Alternatively,	by the count team. Alternatively, this by the count team. Alternatively, this by the count team. Alternatively, this			recomputed by the count team. Alternatively, the
this may be performed by accounting/auditing	may be performed by may be performed by			may be performed by accounting/auditing
employees.	accounting/auditing employees. accounting/auditing employees. accounting/auditing employees.			employees.
The opening/closing table inventory forms	The opening/closing table and marker The opening/closing table and marker The opening/closing table and marker	The opening/closing table inventory forms, if		The opening/closing table and marker inventory
must be either:	inventory forms (if applicable) shall either be: 542.21(d)(10) inventory forms (if applicable) shall either be: 542.21(d)(10) either be: 542.31(d)(10) either be: 542.41(d)(10)	applicable, shall either be: 12(f)(9)(d)		forms must be either:
Examined and traced to or recorded on the	Examined and traced to or recorded on Examined and traced to or recorded on Examined and traced to or recorded on	Examined and traced to or recorded on the count		
a count sheet; or	the count sheet; or 542.21(d)(10)(i) the count sheet; or 542.31(d)(10)(i) the count sheet; or 542.41(d)(10)(i)	sheet; or 12(f)(9)(d)(i)		
If a computerized system is used, accounting	If a computerized system is used,	If a computerized system is used, accounting		If a computerized system is used, accounting
personnel can trace the opening/closing table inventory forms to the count sheet.	accounting personnel can trace the accounting personnel can trace the accounting personnel can trace the	personnel can trace the opening/closing table		personnel can trace the opening/closing table
	opening/closing table and marker opening/closing table and marker inventory forms to the count sheet. opening/closing table and marker inventory forms to the count sheet.	inventory forms to the count sheet. Discrepancies shall be investigated with the findings documented and		and marker inventory forms to the count sheet.
b Discrepancies must be investigated with the findings documented and maintained for	inventory forms to the count sheet. inventory forms to the count sheet. Discrepancies shall be investigated with Discrepancies shall be investigated with Discrepancies shall be investigated with	maintained for inspection. 12(f)(9)(d)(ii)		Discrepancies must be investigated with the findings documented and maintained for
inspection.	the findings documented and the findings documented and the findings documented and	maintained to inspection. 12(n(o)(d)(d)		inspection.
inspectori.	maintained for inspection.			mapeeton.
The count sheet must be reconciled to the total	The count sheet shall be reconciled to The count sheet sh			The count sheet must be reconciled to the total
drop by a count team member who may not	the total drop by a count team member the total drop by a count team m			drop by a count team member agentwho may
function as the sole recorder, and variances	who shall not function as the sole	who shall not function as the sole who shall not function as the sole sole recorder, and variances must be reconciled and		not function as the sole recorder, and variances
shall be reconciled and documented. This	recorder. 542.21(d)(11) recorder. 542.31(d)(11) recorder. 542.41(d)(11) recorder. 542.21(f)(7)	recorder. 542.31(f)(7) recorder. 542.41(f)(7) documented. 12(f)(11)	recorder, and variances must be recorder, and variances must be	shall be reconciled and documented. This
standard does not apply to vouchers removed		-	reconciled and documented. reconciled and documented. This	standard does not apply to vouchers/cash-out
G from financial instrument storage components.		The count sheet must be reconciled to the total drop		tickets removed from CISC <del>financial instrument</del>
		by a count team member who may not function as the		storage components.
		sole recorder, and variances must be reconciled and documented. This standard does not apply to	storage components. 543.17(g)(13)	
		documented. This standard does not apply to vouchers removed from the financial instrument		
		storage components. 12(g)(13)		
All members of the count team must sign the	All members of the count team shall		All count team agents must sign the	All members agents of the count team must sign
count document or a summary report to attest	sign the count document or a summary sign the sound sign the sound sign the sound sign that sign the sound sign the sound sign that sign the sign that sign the sound sign that sign the sound sign that sign the sign that sign that sign the sign that sign that sign that sign the sign that s			the count document or a summary report to
to their participation in the count.	report to attest to their participation in report to attend to the report		participation in the count. 543.17(f)(12) the count. 543.17(g)(14)	attest to their participation in the count.
Н	the count. 542.21(d)(12) the count. 542.31(d)(12) the count. 542.41(d)(12) the count. 542.21(f)(8)	the count. 542.31(f)(8) the count. 542.41(f)(8) All count team agents must sign the report attesting		
		to their participation in the count. 12(g)(14)		
A final verification of the total drop proceeds,		A final verification of the total drop proceeds, before		
before transfer to the cage/vault must include		transfer to cage/vault, must be performed by at least		
the following:		two agents, one of whom is a supervisory count team		
		member, and the other a count team agent. 12(f)(13)	agents, one of whom is a supervisory count team member, and one a count count team member, and the other a	
I		A final verification of the total drop proceeds, before		
		transfer to cage/vault, must be performed by the at	country ()(15)	
		least two agents, one of whom is a supervisory count		
		team member and the other a count team agent.		
		12(g)(15)		
Final verification must be performed by at least		A final verification of the total drop proceeds, before		Final verification must be performed by at least
two (2) count team members, one of whom		transfer to cage/vault, must be performed by at least		two (2) count team members agents, one of
must be a supervisory count team member.		two agents, one of whom is a supervisory count team		whom must be a supervisory count team
		member, and the other a count team agent. 12(f)(13)		member.
1			count team member, and one a count count team member, and the other a	
		A final verification of the total drop proceeds, before	team agent. 543.17(f)(13) count team agent. 543.17(g)(15)	
		transfer to cage/vault, must be performed by the at least two agents, one of whom is a supervisory count		
		team member and the other a count team agent.		
		12(g)(15)		
Final verification must include a comparison of		Final verification must include a comparison of	Final verification must include a	
currency counted totals against the currency		currency counted totals against the currency	comparison of currency counted totals	
counter system/system report, if any		counter/system report, if any counter/system is used.		
counter/system is used.		12(f)(13)(i)	report, if a counter/system is used.	
		Final verification must include a comparison of	543.17(g)(15)(i)	
		Final ventication must include a comparison of currency counted totals against the currency		
		counter/system report, if a counter/system is used.		
Any unresolved variance must be documented		Any unresolved variances must be documented, and	Any unresolved variances must be Any unresolved variances must be	Any unresolved variance must be documented
and the documentation must remain a part of		the documentation must remain part of the final count		and the documentation must remain a part of
the final count record forwarded to Revenue		record forwarded to accounting. 12(f)(13)(ii)	must remain a part of the final count must remain a part of the final count	the final count record forwarded to
Audit.			record forwarded to accounting. record forwarded to accounting.	accounting/Revenue Aaudit.
3		Any unresolved variances must be documented and	543.17(f)(13)(ii) 543.17(g)(15)(ii)	
		the documentation must remain a part of the final		
		count record forwarded to accounting. 12(g)(15)(ii)		
Wilson Markey days of			William West I am I a	
This verification does not require a complete		This verification does not require a complete recount of the drop proceeds, but does require a review	This verification does not require a This verification does not require a complete recount of the drop proceeds, complete recount of the drop proceeds,	
recount of the drop proceeds, but does require a review sufficient to verify the total drop		sufficient to verify the total drop proceeds being	but does require a review sufficient to but does require a review sufficient to	
proceeds being transferred.		transferred. 12(f)(13)(iii)	verify the total drop proceeds being verify the total drop proceeds being	
4			transferred. 543.17(f)(13)(iii) transferred. 543.17(g)(15)(iii)	
		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		
The two (2) count team members must sign the		The two agents must sign the report attesting to the		The two (2) count team members agents must
report attesting to the accuracy of the total		accuracy of the total drop proceeds verified.	attesting to the accuracy of the total attesting to the accuracy of the total	sign the report attesting to the accuracy of the
drop proceeds verified.		12(f)(13)(iv)	drop proceeds verified. 543.17(f)(13)(iv) drop proceeds verified. 543.17(g)(15)(iv)	total drop proceeds verified.
-		The two agents must sign the report attesting to the		
		The two agents must sign the report attesting to the accuracy of the total drop proceeds verified.		
		accuracy or the total grop proceeds verified.		
After certification by the agent receiving the				After certification by the agent receiving the
funds, the drop proceeds must be transferred to				tunds, the drop proceeds must be transferred to
the cage/vault. All drop proceeds must be				the cage/vault. All drop proceeds must be
				transferred to the cage/vault in accordance with
transferred to the cage/vault in accordance with the following standards:				the following standards:

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Property of the content of the con										
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Part										
Part										reconciled, documented, and/or investigated by
A Marie Control Contro	1 accounting/revenue audit.	and received. 542.21(d)(13)	and received. 542.31(d)(13)	and received. 542.41(d)(13)	and received. 542.21(f)(9)	and received. 542.31(f)(9) and received. 542.41(f)(9)				accounting/revenue audit.
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The second secon								audit. 343.17(1)(13)(V)	audit. 343.17(g)(13)(V)	
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Service designation and the control of the control										
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Separation of the second of th	4						The cage/vault agent must not have knowledge or	-0.07	· · · ·	
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The second second stands of the second stands and second stands are second stands ar							12(G)(16)(II)			
The second second stands of the second stands and second stands are second stands ar	All cago/coult meaned must be forwarded.						All count records must be forwarded to assertation of	All count mounts provide to Comment to	All count records must be forwarded:	
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Proportion of the control of the con								only by accounting agents.		
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Les per la production de la production d										
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Manual and Manual An										
Authorized with the control of the c										thereby assuming accountability of the currency
Separate and the second	currency drop proceeds, ending the count.									drop proceeds, ending the count.
# Part of the control	6								543.17(g)(16)(iv)	
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Result that and fall the controlling of the control								543.17(f)(14)(v)	investigated. 543.17(g)(16)(v)	
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escaled and accessible only by accounting despitation of the recognition of of the recognitio							EG 122(1)(15)			
department will retiriced by the accounting department. Siz 21:(0)(14) and provided the accounting department. Siz 21:(0)							The count sheet, with all supporting documents, must	accounting agents, 545.17(1)(15)	accounting department, 343.17(g)(17)	
Administration of the currency drop figures must be unsuffered to see accounting department.  2.26 Squirment uniform of the currency drop figures must be unsuffered to the currency drop figures must be unsuffered to the accounting department.  2.26 Squirment uniform of the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to great the currency drop figures must be unsuffered to direct communications in great computer directions in the currency drop figures must be unsuffered to direct communications in the currency drop figures must be unsuffered to direct communications in the currency drop figures must be unsuffered to direct communications to great the currency drop figures must be unsuffered to direct communications in the currency drop figures must be unsuffered to direct communications in the currency drop figures must be unsuffered to direct communications in the currency drop figures must be unsuffered to direct communications to great the suffered to direct communications to great the currency drop figures must be unsuffered to direct communications to great the currency drop figures must be unsuffered to direct communications to great the currency drop figures must be unsuffered to direct communications to great the currency drop figures must be unsuffered to direct communications to great the currency drop figures must b	department until retrieved by the accounting	retrieved by the accounting departm	ent. retrieved by the accounting departmen	t. retrieved by the accounting department.	retrieved by the accounting department	retrieved by the accounting department. retrieved by the accounting department	nt. be delivered to the accounting department by a count			
2.6   Suplement   Suplement   Supplement	department.	542.21(d)(14)	542.31(d)(14)	542.41(d)(14)	542.21(f)(10)	542.31(f)(10) 542.41(f)(10)				
2   Equipment										
Equipment utilized for the drop and count of the decidence in state of										
A the casino instrument storage containers strange containers storage containers strange	12.4 Equipment									
complex as follows:  B If a currency counter interface is used:  B If a currency counter interface is used:  B If a currency counter interface is used:  Sta 3.17(6)(6)(6)  B It must be adequately restricted to prevent unauthorized access, and 12(f)(6)(6)(A)  It must be adequately restricted to prevent unauthorized access, and 12(f)(6)(6)(A)  It must be adequately restricted to prevent unauthorized access, and 12(f)(6)(6)(A)  It must be adequately restricted to prevent unauthorized access, and 12(f)(6)(6)(A)  It must be adequately restricted to prevent unauthorized access, and 12(f)(6)(6)(A)  If the currency drop figures shall be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media										
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It must be adequately restricted to prevent unauthorized access, and un	B If a currency counter interface is used:						If a currency counter interface is used: 12(f)(6)(iv)			
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It must be adequately restricted to prevent  The currency drop figures shall be transferred via  Via direct communications line or computer storage media to the accounting department.  2  It must be adequately restricted to prevent  Unaniforative accounting department or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  2  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  2  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  4  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  543.17(f)(6)(v)(8)  4  The currency drop figures must be transferred via direct communications sine or computer storage media to the accounting department.  543.17(f)(6)(v)(8)  4  The currency drop figures must be transferred via direct communications sine or computer storage media to the accounting department.  543.17(f)(6)(v)(8)  543.17(f)(6)(v)(8)								unauthorized access; and	prevent unauthorized access; and	
Intervency drop figures shall be transferred via transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures shall be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  Stall (P(s)(iv)(8)  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  Stall (P(s)(iv)(8)  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  Stall (P(s)(iv)(8)  Stall (P(s)(iv)(8)  The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.  Stall (P(s)(iv)(8)  Stall (P(s)(iv)(	1						It must be adequately restricted to prevent	543.17(f)(6)(iv)(A)	543.17(g)(7)(i)	
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accounting department. accounting department. 543.17(g)(77(ii) department.  1 department. 42.1.7(g)(77(ii) department. 543.17(g)(77(ii) department. 543.17(g)(77(										
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to the accounting department. 12(g)(7)(ii)							direct communications line or computer storage media			
							to the accounting department. 12(g)(7)(ii)			
						1				

12.5 Klosks  Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:	542 General Standards 542.21 Table Games 542.31 Table Games	542.41 Table Games 542.21 Gaming Machines	NIGC Class III Guidance  Collecting currency cassettes and financial instrument storage components from kiosks. Controls must be	543 General Standards 543	3 Card Games 543 Player Interfaces	543 Kiosks  Collecting currency cassettes and	Recommended Revisions
implemented to ensure that currency cassettes and financial instrument storage components are securely removed from kiosks. Such controls			Collecting currency cassettes and financial instrument storage components from kiosks. Controls must be			Collecting currency cassettes and	Controls must be established and procedures
			established and procedures implemented to ensure that currency cassettes and financial instrument			financial instrument storage components from kiosks. Controls must be established and procedures	Controls must be established and procedures implemented to ensure that currency cassettes and financial instrument storage components CISC are securely removed from kiosks. Such
			that currency cassettes and manacal instrument storage components are securely removed from kiosks. Such controls must include the following: 12(h)			be established and procedures implemented to ensure that curency cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following: 543.17(h)	CDL are securely removed from MoSks. Such controls must include the following:
			Surveillance must be notified prior to the financial instrument storage components or currency cassettes being accessed in a klosk. 12(h)(1)				Surveillance must be notified prior to the CISC of currency cassettes being accessed in a kiosk.
At least two agents must be involved in the collection of currency cassettes and/or financial instrument storage components from kiosks and at least one agent should be independent of kiosk accountability.			At least two agents must be involved in the collection of currency cassettes and/or financial instrument storage components from kiocks and at least one agent should be independent of kiosk accountability. 12(h)(2)			At least two agents must be involved in the collection of currency cassettes and/or financial instrument storage components from kiosks and at least one agent should be independent of kiosk accountability. 543.17(h)(2)	At least two agents must be involved in the collection of currency cassettes and/or Financial instrument storage components CISC from kiosł and at least one agent should be independent ckiosk accountability.
Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized agents.			Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized agents. \$12(h)(3)			Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized agents. 543.17(h)(3)	Currency cassettes and financial instrument storage components. CISC must be secured in a manner that restricts access to only authorized agents.
Redeemed vouchers and pulltabs (if applicable) collected from the kiosk must be secured and dilivered to the appropriate department (cage or accounting) for reconciliation.			Redeemed vouchers collected from the kiosk must be secured and delivered to the appropriate department (cage or accounting) for reconciliation. 12(h)(4)			Redeemed vouchers and pulltabs (if applicable) collected from the kiosk must be secured and delivered to the appropriate department (cage or accounting) for reconciliation. &a 3.17/HJM	Redeemed vouchers/cash-out tickets and pulltabs (if applicable) collected from the kiosk must be secured and delivered to the appropria department (cage or accounting/revenue audit) for reconciliation.
Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.			Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed. 12(h)(S)			Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed. 543.17(h)(5)	5
Access to stored full kiosk financial instrument storage components and currency cassettes must be restricted to:			Kisok count standards. Access to stored full kiosk financial instrument storage components and currency cassettes must be restricted to: 12(i)(1)			Kiosk count standards. Access to stored full kiosk financial instrument storage components and currency cassettes must be restricted to: 543.17(i)(1)	Access to stored full kiosk-financial instrument- storage components-CISC and currency cassette must be restricted to:
Authorized agents; and     In an emergency, authorized persons for the			Authorized agents; and 12(i)(1)(i)  In an emergency, authorized persons for the resolution			Authorized agents; and 543.17(i)(1)(i)  In an emergency, authorized persons for	
2 resolution of a problem.			of a problem. 12(i)(1)(ii)			the resolution of a problem. 543.17(i)(1)(ii)	
The kiosk count must be performed in a secure area, such as the cage or count room.			The kiosk count must be performed in a secure area, such as the cage or count room. 12(i)(2)			The kiosk count must be performed in a secure area, such as the cage or count room. 543.17(i)((2)	
The kiosk financial instrument storage components and currency cassettes must be individually emptied and counted so as to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded.			The kiosk financial instrument storage components and currency cassettes must be individually emptied and counted so as to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded. 12(i)(4)			The kiosk financial instrument storage components and currency cassettes must be individually emptied and counted so as to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded. 543.17(i)(4)	The kiosk-financial instrument storage- components - CISC and currency cassettes must be individually emptied and counted so as to prevent the commingling of funds between kiods until the count of the kiosk contents has been recorded.
CNGC. ga	frop procedures shall be developed by the fribal garning regulatory authority, or the paming operation as approved by the Tribal paming regulatory authority. (Revised May						
	1, 2005) 442.21(v); 542.31(v); 542.41(v)						
12.7 Variances The operation must establish, as approved by			Variances. The operation must establish, as approved	The operation must establish, as			
The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.				The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.			

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10			
13.1	General Cage Standards.					General Cage Standards
A	For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the CNGC, will be acceptable.  Supervision must be provided as needed for cage, vault,		10(a) Supervision. Supervision must be	543.18(a) Supervision. Supervision must be	5(H) Supervisory Line of Authority. The	For any computer applications utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards in this section, as approved by the CNGC, will be acceptable.  Supervision must be provided as needed for
В	kiosk, and other operations using cash or cash equivalents by an agent(s) with authority equal to or greater than those being supervised.		cash equivalents by an agent(s) with	provided as needed for cage, vault, kiosk, and other operations using cash or cash equivalents by an agent(s) with authority equal to or greater than those being supervised.	enterprise shall provide the TCA and SCA with a chart of the supervisory lines of authority with respect to those directly responsible for the conduct of covered games, and shall promptly notify those agencies of any material changes thereto.	cage, vault, kiosk, and other operations using- cash or cash equivalents by an agent(s) with- authority equal to or greater than those being- supervised.
С	3 3 .	<b>authority</b> , or the gaming operation as approved by the Tribal gaming regulatory				A
D	The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.  Checks			543.18(j) Variances. The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.		В

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10				
	If personal checks, cashier's checks, payroll checks, or	542.14(b)(1) Personal checks, cashier's	10(b)(1) Check cashing. If checks are	543.18(b)(1) Check cashing. (1) If checks are			
	counter checks are cashed at the cage, the CNGC, or the	checks, payroll checks, and counter	cashed at the cage, the controls must	cashed at the cage, the controls must provide			
	gaming operation as approved by the CNGC, shall	<u>checks.</u> If personal checks, cashier's checks,	provide for security and integrity. For	for security and integrity. For each check			
	establish and the gaming operation shall comply with	payroll checks, or counter checks are cashed	each check cashing transaction, the	cashing transaction, the agent(s) conducting			
	appropriate controls for purposes of security and	at the cage, the Tribal gaming regulatory	agent(s) conducting the transaction	the transaction must:			
	integrity.	authority, or the gaming operation as	must:				
		approved by the Tribal gaming regulatory					
		authority, shall establish and the gaming					
		operation shall comply with appropriate					
		controls for purposes of security and					
		integrity.					
Α		integrity.					
		542.14(b)(2) The Tribal gaming regulatory					
		authority, or the gaming operation as					
		approved by the Tribal gaming regulatory					
		authority, shall establish and the gaming					
		operation shall comply with procedures for					
		the acceptance of personal checks, collecting					
		and recording checks returned to the					
		gaming operation after deposit, re-deposit,					
		and write-off authorization.					
	For each check cashing transaction, the agent(s)		10(b)(1) Check cashing. If checks are	543.18(b)(1) Check cashing. (1) If checks are			
	conducting the transaction must:		cashed at the cage, the controls must	cashed at the cage, the controls must provide			
В			provide for security and integrity. For	for security and integrity. For each check			
			each check cashing transaction, the	cashing transaction, the agent(s) conducting			
			agent(s) conducting the transaction	the transaction must:			
	Varify the ametricular identify in		must:	[ 12 10/b/(1)/i/			
1	Verify the patron's identity;		10(b)(1)(i) Verify the patron's identity;	543.18(b)(1)(i) Verify the patron's identity;			
	Examine the check to ensure it includes the patron's		10(b)(1)(ii) Examine the check to ensure	543.18(b)(1)(ii) Examine the check to ensure it			
2	name, current address, and signature;		it includes the patron's name, current	includes the patron's name, current address,			
		<u> </u>	address, and signature;	and signature;			
	For personal checks, verify the patron's check cashing		10(b)(1)(iii) For personal checks, verify	543.18(b)(1)(iii) For personal checks, verify the			
	authority and record the source and results in			patron's check cashing authority and record the			
3	accordance with management policy; however		record the source and results in	source and results in accordance with			
			accordance with management policy;	management policy; however			
			however				
	If a check guarantee service is used to guarantee the			543.18(b)(1)(iv) If a check guarantee service is			
	transaction and the procedures required by the check		is used to guarantee the transaction and	used to guarantee the transaction and the			
1	guarantee service are followed, then the above		the procedures required by the check	procedures required by the check guarantee			
4	requirements do not apply.		guarantee service are followed, then the				
	1		above requirements do not apply.	requirements do not apply.			
	When the late to t	54214(b)(4) <b>NA</b>	10(1-)(4) (4)	542.10(h)(4) \A(h)			
	When traveler's checks or other guaranteed drafts, such			543.18(b)(4) When traveler's checks or other			
	as cashier's checks, are presented, the cashier must		guaranteed drafts, such as cashier's	guaranteed drafts, such as cashier's checks, are			
_	comply with the examination and documentation	•	checks, are presented, the cashier must	presented, the cashier must comply with the			
С	procedures as required by the issuer.		comply with the examination and	examination and documentation procedures as			
		documentation procedures as required by	documentation procedures as required	required by the issuer.			
		the issuer.	by the issuer.				

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 13 - Cage Operation	5.12	BULLETIN 2018-3 §10				Trecommended Trevisions
		542.14(b)(3) When counter checks are	10(b)(2) When counter checks are	543.18(b)(2) When counter checks are issued,			
D	included on the check:		issued, the following must be included	the following must be included on the check:			
_	metaded on the cheek.	the check:	on the check:	the following must be included on the check.			
	The customer's name and signature;	542.14(b)(3)(i) The customer's name and	10(b)(2)(i) The patron's name and	543.18(b)(2)(i) The patron's name and			The customer's patron's name and signature;
1	The customer's name and signature,	signature;	signature;	signature;			The customer's patients name and signature,
	The dollar amount of the counter check (both alpha and		10(b)(2)(ii) The dollar amount of the	543.18(b)(2)(ii) The dollar amount of the			
2	numeric);		counter check;	counter check;			
_	marrier,	Counter check (both alpha and numeric),	counter check,	counter eneck,			
	Patron's bank name, bank routing and account	542.14(b)(3)(iii) Customer's bank name and	10(b)(2)(iii) Patron's bank name, bank	543.18(b)(2)(iii) Patron's bank name, bank			
3	numbers;	bank account number;	routing, and account numbers;	routing, and account numbers;			
4			10(b)(2)(iv) Date of issuance; and	543.18(b)(2)(iv) Date of issuance; and			
-				543.18(b)(2)(v) Signature of the agent			
5	transaction.	_	approving the counter check transaction.				
	transaction.	transaction.	approving the counter thete transaction.	approving the counter check transaction.			
	If a third party check cashing or guarantee service is	transaction.	10(b)(5) If a third party check cashing or	543.18(b)(5) If a third party check cashing or			
	used, the examination and documentation procedures		guarantee service is used, the	quarantee service is used, the examination and			
	required by the service provider apply, unless otherwise			documentation procedures required by the			
E							
_	provided by the Nation's laws or CNGC regulations.		procedures required by the service	service provider apply, unless otherwise			
			provider apply, unless otherwise	provided by tribal law or regulation.			
			provided by tribal law or regulation.				
	Checks are not allowed to be held.		10(b)(3) Checks that are not deposited	543.18(b)(3) Checks that are not deposited in			Checks are not allowed to be held, that are not
	Checks are not allowed to be field.		in the normal course of business, as	the normal course of business, as established			deposited in the normal course of business, as
			· ·				
			established by management, (held	by management, (held checks) are subject to			established by management, (held checks) are
			checks) are subject to §9 lines of credit	§543.15 lines of credit standards.			subject to standards in Section X Lines of Credit.
			standards.				
F							
13.3	Cage and Vault Accountability Standards	[A2 14/4]/(1)	10(a)(1) Canada da	[A2 10 (a)(1) Cara and and the art of the Cara and the Ca			
	All transactions that flow through the cage shall be	_	10(c)(1) Cage and vault accountability.	543.18 (c)(1) Cage and vault accountability. (1)			
	,	accountability. All transactions that flow	3	All transactions that flow through the cage			
Α	and shall be supported by documentation.		3	must be summarized for each work shift of the			
		cage accountability form on a per shift basis	3	cage and must be supported by			
		and shall be supported by documentation.	by documentation.	documentation.			
	Increases and decreases to the total cage inventory		10(c)(2) Increases and decreases to the	543.18 (c)(2) Increases and decreases to the			
	must be verified, supported by documentation, and		total cage inventory must be verified,	total cage inventory must be verified,			
	recorded. Documentation must include the date and		supported by documentation, and	supported by documentation, and recorded.			
	shift, the purpose of the increase/decrease, the agent(s)		recorded. Documentation must include	Documentation must include the date and shift,			
R	completing the transaction, and the person or		the date and shift, the purpose of the	the purpose of the increase/decrease, the			
"	department receiving the cage funds (for decreases		increase/decrease, the agent(s)	agent(s) completing the transaction, and the			
	only).		completing the transaction, and the	person or department receiving the cage funds			
			person or department receiving the cage				
			funds (for decreases only).	, ,,,			
			(				

REF		542	NIGC Class III Guidance	543	Tribal - State Compact RE	F Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10		·	
С	accuracy and maintenance of individual accountability. Such counts shall be attested to by signature and recorded in ink or other permanent form at the end of each shift during which the activity took place. All discrepancies shall be noted and investigated.	comparison for accuracy and maintenance of individual accountability. Such counts shall be recorded at the end of each shift during which activity took place. All discrepancies shall be noted and investigated. Unverified	of each shift during which the activity took place. These agents must make individual counts to compare for accuracy and maintain individual	543.18 (c)(3) The cage and vault inventories (including coin rooms) must be counted independently by at least two agents, attested to by signature, and recorded in ink or other permanent form at the end of each shift during which the activity took place. These agents must make individual counts to compare for accuracy and maintain individual accountability. All variances must be documented and investigated.		
D	operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount	authority, or the gaming operation as approved by the Tribal gaming regulatory authority, 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	10(c)(4) The gaming operation must establish and 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 patrons as they are incurred.	543.18(c)(4) The gaming operation must establish and 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 patrons as they are incurred.		The CNGC, or the gaming operation as approved by the CNGC, shall establish and the operation shall comply with a minimum bankrol 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 operation's customers patrons as they are incurred. A suggested bankroll formula will be provided by the CNGC upon request.
13.4	Kiosks					
Α	Kiosks must be maintained on the cage accountability and must be counted independently by at least two employees, documented, and reconciled for each increase or decrease to the kiosk inventory.		10(d)(1) Kiosks. Kiosks must be maintained on the cage accountability and must be counted independently by at least two agents, documented, and reconciled for each increase or decrease to the kiosk inventory.	Kiosks. Kiosks must be maintained on the cage accountability and must be counted independently by at least two agents, documented, and reconciled for each increase or decrease to the kiosk inventory.  543.18(d)(1)		Kiosks must be maintained on the cage accountability and must be counted independently by at least two employees, agents, documented, and reconciled for each increase or decrease to the kiosk inventory.
В	Currency cassettes must be counted and filled by an employee and verified independently by at least one employee, all of whom must sign each cassette.		10(d)(2) Currency cassettes must be counted and filled by an agent and verified independently by at least one agent who was not involved in the initial count and fill of the cassette, all of whom must sign each cassette.	Currency cassettes must be counted and filled by an agent and verified independently by at least one agent, all of whom must sign each cassette.  543.18(d)(2)		Currency cassettes must be counted and filled by an employee agent and verified independently by at least one employee agent, who was not involved in the initial count and fill of the cassette, all of whom must sign each cassette.
С	tamper resistant seal and, if not placed inside a kiosk, must be stored in a secured area of the cage/vault.	gaming operation as approved by the Tribal	10(d)(3) Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed inside a kiosk, must be stored in a secured area of the cage/vault.	Currency cassettes must be secured with a lock or tamper resistant seal and, if not placed inside a kiosk, must be stored in a secured area of the cage/vault. 543.18(d)(3)		

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10			
	The CNGC or the gaming operation, subject to the	542.13(o)(5)(vii) Alternatively, if a kiosk is	10(d)(4) The TGRA or the gaming	543.18(d)(4) The TGRA or the gaming		The CNGC or the gaming operation, subject to
	approval of the CNGC, must develop and implement	utilized to accept a deposit of credits, the	operation, subject to the approval of the	operation, subject to the approval of the TGRA,		the approval of the CNGC, must develop and
	physical security controls over the kiosks. Controls	Tribal gaming regulatory authority, or the	TGRA, must develop and implement	must develop and implement physical security		implement physical security controls and
	should address the following: forced entry, evidence of	gaming operation as approved by the Tribal	physical security controls over the kiosks.	controls over the kiosks. Controls should		procedures that safeguard the integrity of the
D	any entry, and protection of circuit boards containing	gaming regulatory authority, shall establish	Controls should address the following:	address the following: forced entry, evidence of		kiosk system. over the kiosks. Controls should
	programs.	and the gaming operation shall comply with	forced entry, evidence of any entry, and	any entry, and protection of circuit boards		address the following: forced entry, evidence of
		procedures that safeguard the integrity of	protection of circuit boards containing	containing programs.		any entry, and protection of circuit boards
		the kiosk system.	programs.			containing programs.
	With regard to cashless systems, the CNGC or the		10(d)(5) With regard to cashless	543.18(d)(5) With regard to cashless systems,		
	gaming operation, subject to the approval of the CNGC		systems, the TGRA or the gaming	the TGRA or the gaming operation, subject to		
	must develop and implement procedures to ensure that		1 -	the approval of the TGRA, must develop and		
_	communications between the kiosk and system are		TGRA, must develop and implement	implement procedures to ensure that		
E	secure and functioning.		procedures to ensure that	communications between the kiosk and system		
	g		communications between the kiosk and	are secure and functioning.		
			system are secure and functioning.			
			-7-13 a.e becare and ranctioning.			
	The following reconciliation reports must be available		10(d)(6) The following reconciliation	543.18(d)(6) The following reconciliation		
	upon demand for each day, shift, and drop cycle (this is			reports must be available upon demand for		
	not required if the system does not track the		for each day, shift, and drop cycle (this is	each day, shift, and drop cycle (this is not		
F	information, but the system limitation(s) must be		not required if the system does not track	required if the system does not track the		
	noted):		the information, but system limitation(s)	information, but system limitation(s) must be		
			must be noted):	noted):		
	Starting balance dollar amount per financial instrument;		10(d)(6)(i) Starting balance dollar	543.18(d)(6)(i) Starting balance dollar amount		
1			amount per financial instrument;	per financial instrument;		
	Starting balance number of items per financial		10(d)(6)(ii) Starting balance number of	543.18(d)(6)(ii) Starting balance number of		
2	instrument;		items per financial instrument;	items per financial instrument;		
	Dollar amount per financial instrument issued;		10(d)(6)(iii) Dollar amount per financial	543.18(d)(6)(iii) Dollar amount per financial		
3	·		instrument issued;	instrument issued;		
4	Number of items per financial instrument issued;		Number of items per financial	543.18(d)(6)(iv) Number of items per financial		
4			instrument issued; 10(d)(6)(iv)	instrument issued;		
	Dollar amount per financial instrument redeemed;		10(d)(6)(v) Dollar amount per financial	543.18(d)(6)(v) Dollar amount per financial		
5			instrument issued;	instrument redeemed;		
6	Number of items per financial instrument redeemed;		10(d)(6)(vi) Number of items per	543.18(d)(6)(vi) Number of items per financial		
-			financial instrument redeemed;	instrument redeemed;		
7	Dollar amount per financial instrument increases;		· ·	543.18(d)(6)(vii) Dollar amount per financial		
	Number of them are fine and the transfer of th		instrument increases;	instrument increases;		
8	Number of items per financial instrument increases;		10(d)(6)(viii) Number of items per financial instrument increases:	543.18(d)(6)(viii) Number of items per financial instrument increases;		
	Dollar amount per financial instrument decreases;		10(d)(6)(ix) Dollar amount per financial	543.18(d)(6)(ix) Dollar amount per financial		
9			instrument decreases;	instrument decreases;		
10	Number of items per financial instrument decreases;		10(d)(6)(x) Number of items per	543.18(d)(6)(x) Number of items per financial		
10			financial instrument decreases;	instrument decreases;		
	Ending balance dollar amount per financial instrument;		10(d)(6)(xi) Ending balance dollar	543.18(d)(6)(xi) Ending balance dollar amount		
11	and,		amount per financial instrument; and	per financial instrument; and		
	Ending balance number of items per financial		10(d)(6)(xii) Ending balance number of	543.18(d)(6)(xii) Ending balance number of		
12	instrument.		items per financial instrument.	items per financial instrument.		
12.5	Contamon Democited I 5 - 1					Contamor But Described F
13.5	Customer Deposited Funds					Customer Patron Deposited Funds

REF		542	NIGC Class III Guidance	543	Tribal - State Compact R	EF Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10			
	If a gaming operation permits a customer to deposit	542.14(c) <b>Customer deposited funds.</b> If a	10(e) If a gaming operation permits a	543.18(e) Patron deposited funds. If a gaming		If a gaming operation permits a customer
	funds for safekeeping or front money purposes with the	gaming operation permits a customer to	patron to deposit funds with the gaming	operation permits a patron to deposit funds		patron to deposit funds with the gaming
	operation at the Cage, the following standards shall	deposit funds with the gaming operation at	operation at the cage, and when	with the gaming operation at the cage, and		operation at the Cage, for safekeeping or front
	apply:	the cage, the following standards shall apply.	transfers of patron deposited funds are	when transfers of patron deposited funds are		money purposes with the operation at the Cage,
			transferred to a gaming area for	transferred to a gaming area for wagering		and when transfers of patron deposited funds
			wagering purposes, the following	purposes, the following standards apply:		are transferred to a gaming area for wagering
			standards apply:			purposes the following standards shall apply:
	A file for the customer shall be prepared prior to	A file for customers shall be prepared prior				A file for the <del>customer</del> patron shall be prepared
Α	acceptance of a deposit.	to acceptance of a deposit. 542.14(c)(8)				prior to acceptance of a deposit.
	The CNICC and he are a single and a second household he shall be s	542 14(s)(7) The Tribel mension reconstitution				The CNCC and he manning a counting as
	The CNGC, or the gaming operation as approved by the					The CNGC, or the gaming operation as
	CNGC, shall establish and the operation shall comply	authority, or the gaming operation as				approved by the CNGC, shall establish and the
	with procedures that verify the customer's identity,	approved by the Tribal gaming regulatory				operation shall comply with procedures that
В	including photo identification.	authority, shall establish and the gaming				verify the customer's patron's identity, including
		operation shall comply with procedures that				photo identification.
		verify the customer's identity, including				
		photo identification.				
	Only cash and approved cash equivalents/casino	542.14(c)(6) Only cash, cash equivalents,				Only cash and approved cash equivalents/casino
С	instruments shall be accepted from customers for the	chips, and tokens shall be accepted from				instruments shall be accepted from customers
C	purpose of a customer deposit.	customers for the purpose of a customer				patrons for the purpose of a <del>customer</del> patron
		deposit.				deposit.
	All customer deposits and withdrawal transactions at	542.14(c)(5) All customer deposits and				All customer patron deposits and withdrawal
D	the point of transaction shall be recorded on a cage	withdrawal transactions at the cage shall be				transactions at the point of transaction shall be
_	accountability form on a per-shift basis.	recorded on a cage accountability form on a				recorded on a cage accountability form on a per-
		per-shift basis.				shift basis.
	The receipt or withdrawal of a customer deposit shall be	_	·	543.18(e)(1) The receipt or withdrawal of a		The receipt or withdrawal of a <del>customer</del> patron
	1	1	patron deposit must be documented,	patron deposit must be documented, with a		deposit shall be evidenced by at least a two (2)
Ε	(1) copy given to the customer and one (1) copy	least a two-part document with one copy	with a copy given to the patron and a	copy given to the patron and a copy remaining		part document with one (1) copy given to the
	remaining in the cage file.	going to the customer and one copy	copy remaining in the cage.	in the cage.		customer patron and one (1) copy remaining in
		remaining in the cage file.				the cage file.
	Both copies of the document of receipt or withdrawal	542.14(c)(2) The multi-part receipt shall	10(e)(2) Both copies of the document of	543.18(e)(2) Both copies of the document of		
-	must contain the following information:	contain the following information:	receipt or withdrawal must contain the	receipt or withdrawal must contain the		
г			following information:	following information:		
		54214( )(2)() 5	10( )(2)(2) 5	542.107.127.6		
1	Same document number on each copy;	542.14(c)(2)(i) Same receipt number on all	·	543.18(e)(2)(i) Same receipt number on each		Same document receipt number on each copy;
2	Type of transaction;	copies;	copy;	сору;		
	Customer's name and signature;	542.14(c)(2)(ii) Customer's name and	10(e)(2)(ii) Patron's name and signature:	543.18(e)(2)(ii) Patron's name and signature;		Customer Patron's name and signature;
3	Customer s name and signature,	signature;	======================================	is in a signature,		castomer , at on a name and signature,
4	Date and time of receipt and withdrawal;	542.14(c)(2)(iii) Date of receipt and	10(e)(2)(iii) Date of receipt and	543.18(e)(2)(iii) Date of receipt and withdrawal;		
4		withdrawal;	withdrawal;			
5	Unique Account identifier;					Unique Aaccount identifier;
	Dollar amount of deposit/ withdrawal;	542.14(c)(2)(iv) Dollar amount of	10(e)(2)(iv) Dollar amount of	543.18(e)(2)(iv) Dollar amount of		Dollar amount of deposit/withdrawal (for
		deposit/withdrawal; and	1 .	deposit/withdrawal (for foreign currency		foreign currency transactions include the US
_			transactions include the US dollar	transactions include the US dollar equivalent,		dollar equivalent, the name of the foreign
6			equivalent, the name of the foreign	the name of the foreign country, and the		country, and the amount of the foreign currency
			country, and the amount of the foreign	amount of the foreign currency by		by denomination);
			currency by denomination);	denomination);		
	Nature of deposit/withdrawal (cash, check, chips);	542.14(c)(2)(v) Nature of deposit (cash,	10(e)(2)(v) Nature of	543.18(e)(2)(v) Nature of deposit/withdrawal;		, Nature of deposit/withdrawal (cash, check,
7		check, chips); however,	deposit/withdrawal; and	and	7	chips); and
	•		· · · · · · · · · · · · · · · · · · ·			

REF		542	NIGC Class III Guidance	543	Tribal - State Compact REI	Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10			
	Name and signature of the agent who conducted the		10(e)(2)(vi) Name and signature of the	543.18(e)(2)(vi) Name and signature of the		Name and signature of the agent who
8	transaction; and		agent who conducted the transaction.	agent who conducted the transaction.	8	conducted the transaction; and
0	Nature of deposit (cash, check, chips); however,		10(e)(2)(v) Nature of	543.18(e)(2)(v) Nature of deposit/withdrawal;	Q	Nature of deposit (cash, check, chips); however,
9			deposit/withdrawal; and	and	9	
	The CNGC, or the gaming operation as approved by the	542.14(c)(3) The Tribal gaming regulatory	10(e)(3) Procedures must be established	543.18(e)(3) Procedures must be established		
	CNGC, shall establish and the gaming operation shall	authority, or the gaming operation as	and complied with for front money	and complied with for front money deposits to:		
G	comply with procedures that:	approved by the Tribal gaming regulatory	deposits to:			
Ū		authority, shall establish and the gaming				
		operation shall comply with procedures that:				
	Maintain a detailed record by customer name and date	542.14(c)(3)(i) Maintain a detailed record by	10(a)(3)(i) Maintain a detailed record by	543.18(e)(3)(i) Maintain a detailed record by		Maintain a detailed record by <del>customer</del> patron
1	,	customer name and date of all funds on	patron name and date of all funds on	patron name and date of all funds on deposit;		name and date of all funds on deposit;
1	or all fullus off deposit,	deposit;	deposit;	patron hame and date or all funds on deposit,		marile and date of all fullus off deposit,
	Maintain a current balance of all customer cash	542.14(c)(3)(ii) Maintain a current balance of		543.18(e)(3)(ii) Maintain a current balance of all		
		all customer cash deposits that are in the	all patron deposits that are in the	patron deposits that are in the cage/vault		Maintain a current balance of all <del>customer</del>
2		cage/vault inventory or accountability; and	cage/vault inventory or accountability;	inventory or accountability; and		patron cash deposits that are in the Cage/Vault
	accountability, una	cage, value inverteory or accountability, and	and	inventory or decountability, and		inventory or accountability; and
	Reconcile this current balance with the deposits and	542.14(c)(3)(iii) Reconcile this current	10(e)(3)(iii) Reconcile the current	543.18(e)(3)(iii) Reconcile the current balance		
3	withdrawals at least daily.	balance with the deposits and withdrawals at	balance with the deposits and	with the deposits and withdrawals at least daily.		
	,	least daily.	withdrawals at least daily.			
	The gaming operation, as approved by the CNGC, shall	542.14(c)(4) The gaming operation, as				
		approved by the Tribal gaming regulatory				The gaming energtion as approved by the
	attesting to the accuracy of the information contained	authority, shall describe the sequence of the				The gaming operation, as approved by the
Н	on the customer deposit or withdrawal form ensuring	required signatures attesting to the accuracy				CNGC, shall describe the sequence of the
	that the form is signed by the cashier.	of the information contained on the				required signatures attesting to the accuracy of the information contained on the customer
		customer deposit or withdrawal form				patron deposit or withdrawal form ensuring that
		ensuring that the form is signed by the				the form is signed by the cashier.
12.6	Chip Standards	cashier				the form is signed by the cashier.
13.0	The CNGC, or the gaming operation as approved by the	542 14(e) Chin and token standards The	10(g) Controls must be established and	543.18(g) Chip(s) and token(s). Controls must		The CNGC, or the gaming operation as
	CNGC, shall establish and the gaming operation shall	<u> </u>	procedures implemented to ensure	be established and procedures implemented to		approved by the CNGC, shall establish and the
	<u> </u>		accountability of chip and token	ensure accountability of chip and token		gaming operation shall comply with procedures
	storage, and destruction of gaming chips and tokens.		inventory. Such controls must include,	inventory. Such controls must include, but are		for the purchase, receipt, inventory, storage, and
		and the gaming operation shall comply with		not limited to, the following:		destruction of gaming chips and tokens.
		procedures for the receipt, inventory,	but are not infilted to, the following.	not inflited to, the following.		destruction of gaming chips and tokens.
		storage, and destruction of gaming chips				
		and tokens.				
		una tokens.				
13 7	Accounting/Auditing Standards	542.14(g)				
13.7	The operation shall comply with the following	5 12.1 1(g)				
	standards:					
	The cage accountability shall be reconciled to the	542.14(g)(1) <b>Accounting/auditing</b>	13(d)(10)(i) At least monthly, the cage	543.24(d)(9)(i) Cage, vault, cash, and cash		
٨		standards. The cage accountability shall	accountability must be reconciled to the	equivalents. At least monthly, the cage		
А		_	general ledger.	accountability must be reconciled to the		
		monthly.		general ledger.		

REF		542	NIGC Class III Guidance	543	Tribal - State Compact REF	Recommended Revisions
	Section 13 - Cage Operation		BULLETIN 2018-3 §10			
В	A trial balance of gaming operation accounts receivable, including the name of the customer and current balance, shall be prepared at least monthly for active, inactive, settled or written-off accounts.	542.14(g)(2) A trial balance of gaming operation accounts receivable, including the name of the customer and current balance, shall be prepared at least monthly for active, inactive, settled or written-off accounts.	13(d)(9)(i)(C) Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts;	543.24(d)(7)(i)(C) Lines of credit. At least three (3) times per year, an agent independent of the cage, credit, and collection functions must perform the following review: (C) Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts; and		A trial balance of gaming operation accounts receivable, including the name of the customer patron and current balance, shall be prepared a least monthly for active, inactive, settled or written-off accounts.
С	The trial balance of gaming operation accounts receivable shall be reconciled to the general ledger each month. The reconciliation and any follow-up performed shall be documented, maintained for inspection, and provided to the CNGC upon request.	542.14(g)(3) <b>The trial balance of gaming operation</b> accounts receivable shall be reconciled to the general ledger each month. The reconciliation and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	payments are being properly recorded;			
D	On a monthly basis an evaluation of the collection percentage of credit issued to identify unusual trends shall be performed.	542.14(g)(4) <b>On a monthly basis</b> an evaluation of the collection percentage of credit issued to identify unusual trends shall be performed.	13(d)(9)(ii) At least monthly, perform an evaluation of the collection percentage of credit issued to identify unusual trends.	543.24(d)(7)(ii) At least monthly, perform an evaluation of the collection percentage of credit issued to identify unusual trends.		
E	All cage and credit accounting procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the CNGC upon request.	542.14(g)(5) All cage and credit accounting procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	a criss.			
13.8	Extraneous Items					
	The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with procedures to address and limit the transporting of extraneous items, such as coats, purses, beverage containers, and/or boxes, into and out of the cage, coin room, count room, and/or vault.	gaming regulatory authority, or the gaming	such as personal belongings, tool boxes, beverage containers, etc., into and out of	Cage and vault access. Controls must be established and procedures implemented to: (2) Limit transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage. 543.18(i)(2)		The CNGC, or the gaming operation as approved by the CNGC, shall establish and the gaming operation shall comply with procedures to address and limit the transporting of extraneous items, such as coats, purses, beverage containers, and/or tool boxes, into an out of the cage, coin room, count room, and/or vault.
13.9	Cage Cashier Access					Cage Cashier and Vault Access
	Controls must be established and procedures implemented to restrict physical access to the cage to cage agents, designated staff, and other authorized persons.		must be established and procedures implemented to: (1) Restrict physical access to the cage to cage agents, designated staff, and other authorized	543.18(i)(1) Cage and vault access. Controls must be established and procedures implemented to: (1) Restrict physical access to the cage to cage agents, designated staff, and other authorized persons; and		
	Other Standards		persons: and			

REF	542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
Section 13 - Cage Operation		BULLETIN 2018-3 §10				
The standards in Section 4 – General Provisions, Section						
11 – Casino Instruments and Exchanges, Section 15 –						
Marketing Programs, and Section 18 – Financial						
Transaction Reporting shall also apply to Section 13.						

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
						543.17(j) Controlled keys.	14.1	General Standards
					16(a) Supervision. Supervision must be			
					provided over controlled keys as needed by an			
					agent(s) with authority equal to or greater than			
					those being supervised.			
					16(b) Custody of all keys involved in the drop			Custody of all keys involved in the drop
					and count must be maintained by a			and count, including duplicates, must be
					department independent of the count and the			maintained by a department
					drop agents as well as those departments			independent of the count and the drop
					being dropped and counted.			agents as well as those departments
							Α	being dropped and counted.
					16(c) Controls must be established and	543.17(j) Controls must be established		Controls must be established and
					procedures implemented to safeguard the use,			procedures implemented to safeguard
						safeguard the use, access, and security	В	the use, access, and security of keys in
					the following:	of keys in accordance with the		accordance with the following:
					1 C( ) (1) E   1 C	following:		5 1 60 60 1
					16(c)(1) Each of the following requires a	543.17(j)(1) Each of the following requires a separate and unique key		Each of the following requires a separate
					separate and unique key lock or alternative secure access method:	lock or alternative secure access	1	and unique key lock or alternative secure access method:
					secure access method.	method:		access method.
					16(c)(1)(i) Drop cabinet;	543.17(j)(1)(i) Drop cabinet;		Drop cabinet;
					The second secon	y, x, zp. s. s.,		
							a	
							а	
					16(c)(1)(ii) Drop box release;	F42 17(3)(1)(3) David Lawrelesson	b	Duest have selected
					16(c)(1)(iii) Drop box release,	543.17(j)(1)(ii) Drop box release; 543.17(j)(1)(iii) Drop box content; and	b	Drop box release; Drop box content;
					10(c)(1)(iii) Drop box content,	343.17(J)(1)(III) Drop box content, and	C	brop box content,
					16(c)(1)(iv) Bill acceptor canister release;		d	Bill acceptor canister release;
					16(c)(1)(v) Bill acceptor canister content;		е	Bill acceptor canister content;
					16(c)(1)(vi) Count room keys;		f	Count room keys;
					16(c)(1)(vii) Storage racks and carts;	543.17(j)(1)(iv) Storage racks and carts	a	Storage racks and carts;
						used for the drop.	9	
					16(c)(1)(viii) Kiosk release; and		h ·	Kiosk release; and
					16(c)(1)(ix) Kiosk contents.	F42 17(3)(2) A 4	İ	Kiosk contents.
					16(c)(2) Access to and return of keys or	543.17(j)(2) Access to and return of		Access to and return of keys or
					equivalents must be documented with the date, time, and signature or other unique	keys or equivalents must be documented with the date, time, and		equivalents must be documented with the date, time, and signature or other
					identifier of the agent accessing or returning	signature or other unique identifier of	2	unique identifier of the agent accessing
					the key(s).	the agent accessing or returning the		or returning the key(s).
					1110 ACY(3).	kev(s).		or returning the key(s).
					16(c)(3) Documentation of all keys, including	543.17(j)(3) Documentation of all keys,		Documentation of all keys, including
					duplicates, must be maintained, including:	including duplicates, must be	3	duplicates, must be maintained,
						maintained, including:		including:
					16(c)(3)(i) Unique identifier for each individual	543.17(j)(3)(i) Unique identifier for each	a	Unique identifier for each individual key;
					key;	individual key;	<u> </u>	The same of the same key,
					16(c)(3)(ii) Key storage location;	543.17(j)(3)(ii) Key storage location;	b	Key storage location;
					16(c)(2)(iii) Number of laws and dual's state			
					16(c)(3)(iii) Number of keys made, duplicated,	543.17(j)(3)(iii) Number of keys made,	_	Number of keys made, duplicated, and
					and destroyed; and	duplicated, and destroyed; and	С	destroyed; and
					1	1		

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
					16(c)(3)(iv) Authorization and access.	543.17(j)(3)(iv) Authorization and	d	Authorization and access.
14.1	•		542.31(m) Table game drop box key control standards.	542.41(m) <u>Table game drop box key control</u> <u>standards.</u>		access.	14 2	Table Games Drop Box / Financial- Casino Instrument Storage Component Container (CISC) Keys.
А	compliance with this Section 14.1 if the CNGC, or the gaming operation as approved by the CNGC, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.	542.21(m)(1) Tier A gaming operations shall be exempt from compliance with this paragraph if the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.						
В	to insure that unauthorized access to empty table	and implemented to insure that unauthorized access to empty table game drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the	542.31(m)(1) Procedures shall be developed and implemented to insure that unauthorized access to empty table game drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the tables.	542.41(m)(1) Procedures shall be developed and implemented to insure that unauthorized access to empty table game drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the tables.		Collecting currency cassettes and financial instrument storage components from kiosks. Controls must be established and procedures implememented to ensure that currencey cassettes and financial instrument storage components are securely removed from kiosks. Such controls must include the following:  (3) Currency cassettes and financial instrument storage components must be secured in a manner that restricts access to only authorized agents.  543.17(h)(3) ??		Procedures shall be developed and implemented to insure that unauthorized access to empty-table game drop-boxes/financial instrument storage components CISCs shall not occur from the time the boxes containers leave the storage racks until they are placed on the tables.
С	independent of the cage department shall be required to access stored empty table game drop	persons independent of the cage department shall be required to access stored empty table	542.31(m)(2) The involvement of at least two persons independent of the cage department shall be required to access stored empty table game drop boxes.	542.41(m)(2) The involvement of at least two persons independent of the cage department shall be required to access stored empty table game drop boxes.	16(c)(2)(i) For Tier A and B operations, at least two drop team agents are required to be present to access and return keys. For Tier C operations, at least three drop team agents are required to be present to access and return keys.	543.17(j)(2)(i) For Tier A and B operations, at least two drop team agents are required to be present to access and return keys. For Tier C operations, at least three drop team agents are required to be present to access and return keys.		The involvement of at least two persons independent of the cage department shall be required to access stored empty table game drop boxes / financial instrument storage components. For Tier A and B operations, at least two drop team agents are required to be present to access and return keys. For Tier C operations, at least three drop team agents are required to be present to access and return keys.
D	The release keys shall be separately keyed from the contents keys.		542.31(m)(3) The release keys shall be separately keyed from the contents keys.	542.41(m)(3) The release keys shall be separately keyed from the contents keys.	16(c)(1) Each of the following requires a separate and unique key lock or alternative secure access method:	543.17(j)(1) Each of the following requires a separate and unique key lock or alternative secure access method:		The release keys shall be separately keyed from the contents keys.
E	team members are required to be present at the		542.31(m)(4) At least two count team members are required to be present at the time count room and other count keys are issued for the count.		three count team agents are required to be present at the time count keys are issued for the count. For Tier C operations with three	-		

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
	For Tier C operations, at least three (two for table			542.41(m)(4) At least three (two for table game	16(c)(2)(ii) For Tier A and B operations, at least	543.17(j)(2)(ii) For Tier A and B	Fo	or Tier C operations, at least three (two
	game drop box/financial instrument storage			drop box keys in operations with three tables	two count team agents are required to be	operations, at least two (2) count team	fo	r table game drop box/financial
	component keys in operations with three tables or	-		or fewer) count team members are required to	present at the time count room and other	agents are required to be present at	in	strument storage component CISC
	fewer) count team members are required to be			be present at the time count room and other	count keys are issued for the count. For Tier C	the time count room and other count	ke	eys in operations with three tables or
	present at the time count room and other count			count keys are issued for the count.	operations with four tables or more, at least	keys are issued for the count. For Tier	fe	wer) count team <del>members</del> agents are
	keys are issued for the count.			,	three count team agents are required to be	C operations, at least three (two for		equired to be present at the time count
F					present at the time count keys are issued for	card game drop box kevs in		oom and other count keys are issued for
					the count. For Tier C operations with three	operations with three tables or		e count.
					tables or fewer, at least two count team	fewer) count team agents are		
					agents are required to be present at the	required to be present at the time		
					time count keys are issued for the count.	count room and other keys are		
					,	issued for the count.		
	All duplicate keys shall be maintained in a manner	542.21(m)(6) All duplicate keys shall be	542.31(m)(5) All duplicate keys shall be	542.41(m)(5) All duplicate keys shall be	16(c)(3)(iii) Number of keys made, duplicated,		Al	Il duplicate keys shall be maintained in
	that provides the same degree of control as is	maintained in a manner that provides the same	maintained in a manner that provides the same	maintained in a manner that provides the same	and destroyed; and		a	manner that provides the same degree
	required for the original keys. Records shall be	degree of control as is required for the original	degree of control as is required for the original	degree of control as is required for the original			of	control as is required for the original
G	maintained for each key duplicated that indicate		keys. Records shall be maintained for each key	=			ke	eys. <del>Records shall be maintained for</del>
	the number of keys made and destroyed.		duplicated that indicate the number of keys	duplicated that indicate the number of keys			ea	ach key duplicated that indicate the
	, , , , , , , , , , , , , , , , , , ,	made and destroyed.	made and destroyed.	made and destroyed.				umber of keys made and destroyed.
		,		,				,
	Logs shall be maintained by the custodian of	542.21(m)(7) Logs shall be maintained by the	542.31(m)(6) Logs shall be maintained by the	542.41(m)(6) Logs shall be maintained by the				
	sensitive keys to document authorization of	custodian of sensitive keys to document	custodian of sensitive keys to document	custodian of sensitive keys to document				
Н	personnel accessing keys.		authorization of personnel accessing keys.	authorization of personnel accessing keys.				
	3 7	, , , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , , ,	,				
	Table game drop box / financial instrument		542.31(n) Table game drop box release keys.	542.41(n) Table game drop box release keys.				able gGame drop box / financial
	storage component release keys.	542.21(o) Bill acceptor canister release keys.	542.31(o) Bill acceptor canister release keys.	542.41(o) Bill acceptor canister release keys.				estrument storage component CISC
14.2							14.3	release kKeys.
	Tier A gaming operations shall be exempt from	542.21(n)(1) Tier A gaming operations shall be						
	compliance with this Section 14.2 if the CNGC, or	exempt from compliance with this paragraph if						
	the gaming operation as approved by the CNGC,	the Tribal gaming regulatory authority, or the						
	establishes and the gaming operation complies	gaming operation as approved by the Tribal						
	with procedures that maintain adequate key	gaming regulatory authority, establishes and						
	control and restricts access to the keys.	the gaming operation complies with						
		procedures that maintain adequate key control						
		and restricts access to the keys.						
Α		542.21(o)(1) Tier A gaming operations shall be						
		exempt from compliance with this paragraph if						
		the Tribal gaming regulatory authority, or the						
		gaming operation as approved by the Tribal						
		gaming regulatory authority, establishes and						
		the gaming operation complies with						
		procedures that maintain adequate key control						
		and restricts access to the keys.						
1		,						
	The table game drop box / financial instrument		542.31(n)(1) The table game drop box release	542.41(n)(1) The table game drop box release	16(b) Custody of all keys involved in the drop			ne table game drop box / financial
	storage component release keys shall be		keys shall be maintained by a department	keys shall be maintained by a department	and count must be maintained by a		1	strument storage component release
	maintained by a department independent of the	independent of the pit department.	independent of the pit department.	independent of the pit department.	department independent of the count and the		1	eys shall be maintained by a
	pit department.				drop agents as well as those departments		de	epartment independent of the pit
В		542.21(o)(2) The bill acceptor canister release	542.31(o)(1) The bill acceptor canister release	542.41(o)(1) The bill acceptor canister release	being dropped and counted.		de	<del>epartment.</del>
		keys shall be maintained by a department	keys shall be maintained by a department	keys shall be maintained by a department				
		independent of the gaming machine	independent of the gaming machine	independent of the gaming machine				
		department.	department.	department.				

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
С	Only the person(s) authorized to remove table game drop box / financial instrument storage components from the tables shall be allowed access to the table game drop box / financial instrument storage component release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table game drop boxes / financial instrument storage components.	shall be allowed access to the table game drop box release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table game drop boxes.  542.21(o)(3) Only the person(s) authorized to remove bill acceptor canisters from the gaming	shall be allowed access to the table game drop box release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table game drop boxes.  542.31(o)(2) Only the person(s) authorized to remove bill acceptor canisters from the gaming	542.41(n)(2) Only the person(s) authorized to remove table game drop boxes from the tables shall be allowed access to the table game drop box release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table game drop boxes.  542.41(o)(2) Only the person(s) authorized to remove bill acceptor canisters from the gaming machines shall be allowed access to the release keys.	boxes/storage component are allowed access to drop box/storage component release keys.	543.17(j)(6) Other than the count team, only agents authorized to remove drop boxes are allowed access to drop box release keys.	В	Only the person agent(s) authorized to remove table game drop box / financial-instrument storage components from the tables CISC shall be allowed access to the table game drop box / financial-casino instrument storage component CISC release keys; however, the count team members agents may have access to the release keys during the soft count in order to reset the table game drop boxes / financial instrument storage components containers.
D	Persons authorized to remove the table game drop boxes / financial instrument storage components shall be precluded from having simultaneous access to the table game drop box / financial instrument storage component contents keys and release keys.	table game drop boxes shall be precluded fom having simultaneous access to the table game drop box contents keys and release keys.  542.21(o)(4) Persons authorized to remove the bill acceptor canisters shall be precluded fom	table game drop boxes shall be precluded fom having simultaneous access to the table game drop box contents keys and release keys.  542.31(o)(3) Persons authorized to remove the bill acceptor canisters shall be precluded fom	542.41(n)(3) Persons authorized to remove the table game drop boxes shall be precluded fom having simultaneous access to the table game drop box contents keys and release keys.  542.41(o)(3) Persons authorized to remove the bill acceptor canisters shall be precluded fom having simultaneous access to the bill acceptor canister contents keys and release keys.			С	Persons Agents authorized to remove the table game drop boxes / financial instrument storage components CISC shall be precluded from having simultaneous access to the table game drop box / financial instrument storage component CISC contents keys and release keys.
E	For situations requiring access to a table game drop box / financial instrument storage component at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	table game drop box at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	table game drop box at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	a 542.41(n)(4) For situations requiring access to a table game drop box at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.  542.41(o)(4) For situations requiring access to a bill acceptor canister at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	scheduled drop and count must be properly authorized and documented.  16(c)(2) Access to and return of keys or equivalents must be documented with the	543.17(j)(7)Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.		For situations requiring access to a table game drop box / financial instrument storage component CISC at a time other than the scheduled drop, the date, time, and signature of employee agent signing out/in the release key must be documented.
1/1 2	Gaming Systems Keys						14.4	
A B	For the installation of new gaming systems, standards set forth in Section 7.4 Gaming Systems – Machines of this document shall apply to this part.  Gaming machine coin drop cabinet keys, including duplicates, shall be maintained by a department independent of the gaming machine department.				16(b) Custody of all keys involved in the drop and count must be maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.			For the installation of new gaming systems, standards set forth in Section 7.4 Gaming Systems — Machines — Installation of this document shall apply to this part.  Gaming machine coin drop cabinet keys, including duplicates, shall be maintained by a department independent of the gaming machine department.
С	The physical custody of the keys needed to access gaming machine coin drop cabinets, including duplicates, shall require the involvement of two persons, one of whom is independent of the gaming machine department.							The physical custody of the keys needed to access gaming machine coin drop cabinets, including duplicates, shall require the involvement of two persons, one of whom is independent of the gaming machine department.

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
D 14.4	Section 14 - Key and Access Controls Two employees (separate from key custodian) shall be required to accompany such keys while checked out and observe each time gaming machine drop cabinets are accessed, unless, in Tiers B and C gaming operations, surveillance is notified each time keys are checked out and surveillance observes the person throughout the period the keys are checked out.  Financial Instrument Storage Component Release Key Controls.  Tier A gaming operations shall be exempt from	542.21(o) <i>Bill acceptor canister release keys</i> . 542.21(o)(1) Tier A gaming operations shall be	542.31(o) Bill acceptor canister release keys.	542.41(o) Bill acceptor canister release keys.	§16	Effective: 12/21/2018	14.5	Two employees agents (separate from key custodian) shall be required to accompany such keys while checked out and observe each time gaming machine drop cabinets are accessed, unless, in Tiers B and C gaming operations, surveillance is notified each time keys are checked out and surveillance observes the person throughout the period the keys are checked out.  Financial- Instrument-Storage-Component CISC Release Key Controls.  Tier A gaming operations shall be
А	compliance with this Section 14.4 if the CNGC, or the gaming operation as approved by the CNGC, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.	exempt from compliance with this paragraph in the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, establishes and the gaming operation complies with procedures that maintain adequate key contro and restricts access to the keys.						exempt from compliance with this Section 14.45 if the CNGC, or the gaming operation as approved by the CNGC, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.
В	Financial instrument storage component release keys shall be maintained by a department independent of the gaming machine department.	542.21(o)(2) The bill acceptor canister release keys shall be maintained by a department independent of the gaming machine department.	542.31(o)(1) The bill acceptor canister release keys shall be maintained by a department independent of the gaming machine department.	542.41(o)(1) The bill acceptor canister release keys shall be maintained by a department independent of the gaming machine department.	16(b) Custody of all keys involved in the drop and count must be maintained by a department independent of the count and the drop agents as well as those departments being dropped and counted.			Financial instrument storage component release keys shall be maintained by a department independent of the gaming machine department.
С	Only the person(s) authorized to remove financial instrument storage components from the gaming machines shall be allowed access to the release keys.		remove bill acceptor canisters from the gaming	542.41(o)(2) Only the person(s) authorized to g remove bill acceptor canisters from the gaming e machines shall be allowed access to the release keys.	16(c)(5) Other than the count team, only agents authorized to remove drop		В	Other than the count team, Oonly the person agent(s) authorized to remove financial instrument storage components CISC from the gaming machines shall be allowed access to the release keys.
D	Persons authorized to remove the financial instrument storage components shall be precluded from having simultaneous access to the financial instrument storage component contents keys and release keys.	bill acceptor canisters shall be precluded fom	bill acceptor canisters shall be precluded fom	542.41(o)(3) Persons authorized to remove the bill acceptor canisters shall be precluded fom r having simultaneous access to the bill acceptor canister contents keys and release keys.			С	Persons- Agents authorized to remove the financial instrument storage-components CISC shall be precluded from having simultaneous access to the financial instrument storage component-CISC contents keys and release keys.
E	For situations requiring access to a financial instrument storage component at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	542.21(o)(5) For situations requiring access to a bill acceptor canister at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	a 542.31(o)(4) For situations requiring access to a bill acceptor canister at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	a 542.41(o)(4) For situations requiring access to a bill acceptor canister at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.	scheduled drop and count must be properly	(j)(7) Any use of keys at times other than the scheduled drop and count must be properly authorized and documented.	D	For situations requiring access to a financial instrument storage component CISCs at a time other than the scheduled drop, the date, time, and signature of employee signing out/in the release key must be documented.
14.5	Financial Instrument Storage Component Transport Cart Keys	542.21(p) Table game drop box storage rack keys. 542.21(q) Bill acceptor canister storage rack	542.31(p) Table game drop box storage rack keys.  542.31(q) Bill acceptor canister storage rack	542.41(p) Table game drop box storage rack keys.  542.41(q) Bill acceptor canister storage rack			14.6	Financial Instrument Storage Component CISC Transport Cart Keys
21.0		keys.	keys.	keys.			24.0	

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018	Recommended Revisions
A	Tier A gaming operations shall be exempt from compliance with this Section 14.5 if the CNGC, or the gaming operation as approved by the CNGC, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.	542.21(p)(1) Tier A gaming operations shall be exempt from compliance with this paragraph if the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.  542.21(q) Tier A gaming operations shall be exempt from compliance with this paragraph if the Tribal gaming regulatory authority, or the gaming operation as approved by the Tribal gaming regulatory authority, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.					Tier A gaming operations shall be exempt from compliance with this Section 14.56 if the CNGC, or the gaming operation as approved by the CNGC, establishes and the gaming operation complies with procedures that maintain adequate key control and restricts access to the keys.
В	For Tier C operations, a person independent of the gaming machine department shall be required to accompany the financial instrument storage component storage rack keys and observe each time canisters are removed from or placed in storage racks.			542.41(p)(1) A person independent of the pit department shall be required to accompany the table game drop box storage rack keys and observe each time table game drop boxes are removed from or placed in storage racks.  542.41(q)(2) A person independent of the gaming machine department shall be required to accompany the bill acceptor canister storage rack keys and observe each time canisters are removed from or placed in storage racks.			For Tier C operations, an agent personindependent of the gaming machine department shall be required to accompany the financial instrument storage component CISC storage rack keys and observe each time canisters are removed from or placed in storage racks.
C	Persons authorized to obtain financial instrument storage component storage rack keys shall be precluded from having simultaneous access to financial instrument storage component contents keys with the exception of the count team.	precluded from having simultaneous access to table game drop box contents keys, with the exception of the count team.  542.21(q)(2) Persons authorized to obtain bill acceptor canister storage rack keys shall be precluded from having simultaneous access to bill acceptor canister contents keys, with the	game drop box storage rack keys shall be precluded from having simultaneous access to table game drop box contents keys, with the exception of the count team.  542.31(q) Persons authorized to obtain bill acceptor canister storage rack keys shall be	542.41(p)(2) Persons authorized to obtain table game drop box storage rack keys shall be precluded from having simultaneous access to table game drop box contents keys, with the exception of the count team.  542.41(q)(2) Persons authorized to obtain bill acceptor canister storage rack keys shall be precluded from having simultaneous access to bill acceptor canister contents keys with the exception of the count team.	16(c)(4) Other than the count team, no agent may have access to the drop box/storage component content keys while in possession of storage rack keys and/or release keys.	543.17(j)(5) Other than the count team, no agent may have access to the drop box content keys while in possession of storage rack keys and/or release keys.	Persons Agents authorized to obtain financial instrument storage component CISC storage rack keys and/or release keys shall be precluded from having simultaneous access to financial instrument storage component CISC contents keys with the exception of the count team.
14.6	Financial Instrument Storage Component Contents Keys		542.31(r) Table game drop box contents keys. 542.31(s) Bill acceptor canister contents keys.	542.41(r) Table game drop box contents keys. 542.41(s) Bill acceptor canister contents keys.			Financial Instrument Storage Component- CISC Contents Keys

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF
- 1121	Section 14 - Key and Access Controls	312.22	312.32	512.12	§16	Effective: 12/21/2018	Recommended Revisions
	Tier A gaming operations shall be exempt from	542.21(r)(1) Tier A gaming operations shall be			310	Lifective. 12/21/2010	Recommended Revisions
	compliance with this paragraph if the CNGC, or	exempt from compliance with this paragraph if					
	the gaming operation as approved by the CNGC,	the Tribal gaming regulatory authority, or the					
	establishes and the gaming operation complies	gaming operation as approved by the Tribal					
	with procedures that maintain adequate key	gaming regulatory authority, establishes and					
	control and restricts access to the keys.	the gaming operation complies with					
	control and restricts access to the keys.	procedures that maintain adequate key control					
		and restricts access to the keys.					
		and restricts decess to the keys.					
		542.21(s)(1) Tier A gaming operations shall be					
Α		exempt from compliance with this paragraph if					
		the Tribal gaming regulatory authority, or the					
		gaming operation as approved by the Tribal					
		gaming operation as approved by the misal gaming regulatory authority, establishes and					
		the gaming operation complies with					
		procedures that maintain adequate key control					
		and restricts access to the keys.					
		and restricts access to the keys.					
	The physical custody of the keys needed for		542.31(r)(1) The physical custody of the keys	542.41(r)(1) The physical custody of the keys			The physical custody of the keys needed
	accessing stored, full financial instrument storage	needed for accessing stored, full table game	needed for accessing stored, full table game	needed for accessing stored, full table game			for accessing stored, full financial
	component contents shall require involvement of	drop box contents shall require the	drop box contents shall require the	drop box contents shall require the			instrument storage component CISC
	persons from two separate departments, with the	involvement of persons from at least two	involvement of persons from at least two	involvement of persons from at least two			contents shall require involvement of
	exception of the count team.	separate departments, with the exception of	separate departments, with the exception of	separate departments, with the exception of			persons agents from two separate
_		the count team.	the count team.	the count team.			departments, with the exception of the
В							count team.
		542.21(s)(2) The physical custody of the keys	542.31(s)(1) The physical custody of the keys	542.41(s)(1) The physical custody of the keys			
		needed for accessing stored, full bill acceptor	needed for accessing stored, full bill acceptor	needed for accessing stored, full bill acceptor			
		canister contents shall require involvement of	canister contents shall require involvement of	canister contents shall require involvement of			
		persons from two separate departments, with	persons from two separate departments, with	persons from two separate departments, with			
		the exception of the count team.	the exception of the count team.	the exception of the count team.			
	For Tiers A and B gaming operations, access to the	542 21(r)(3) Access to the table game drop box	542.31(r)(2) Access to the table game drop box	542.41(r)(2) Access to the table game drop box			For Tiers A and B gaming operations,
	financial instrument storage component contents	contents key at other than scheduled count	contents key at other than scheduled count	contents key at other than scheduled count			access to the financial instrument
	key at other than scheduled count times shall	times shall require the involvement of at least	times shall require the involvement of at least	times shall require the involvement of at least			storage component CISC contents key at
	require the involvement of at least two persons	two persons from separate departments,	two persons from separate departments,	three persons from separate departments,			other than scheduled count times shall
	from separate departments, one of whom must be			including management. The reason for access			require the involvement of at least two
	a supervisor. For Tier C gaming operations, access	5 5	5 5	shall be documented with the signatures of all			persons agents from separate
	to the financial instrument storage component		participants and observers.	participants and observers.			departments, one of whom must be a
	contents key at other than scheduled count times						supervisor. For Tier C gaming operations,
	shall require the involvement of at least three	542.21(s)(3) Access to the bill acceptor canister	542.31(s)(2) Access to the bill acceptor canister	542.41(s)(2) Access to the bill acceptor canister			access to the financial instrument
C	persons, one of whom must be a supervisor. The	contents key at other than scheduled count	contents key at other than scheduled count	contents key at other than scheduled count			storage component CISC contents key at
	reason for access shall be documented with the	times shall require the involvement of at least	times shall require the involvement of at least	times shall require the involvement of at least			other than scheduled count times shall
	signatures of all participants and observers.	two persons from separate departments, one	two persons from separate departments, one	three persons from separate departments, one			require the involvement of at least three
		·	of whom must be a supervisor. The reason for	of whom must be a supervisor. The reason for			persons agents, one of whom must be a
		·	access shall be documented with the	access shall be documented with the signatures			supervisor. The reason for access shall be
		signatures of all participants and observers.	signatures of all participants and observers.	of all participants and observers.			documented with the signatures of all
		Signatures of an participants and esservers.	signatures or an participants and observers.	or an participants and observers.			participants and observers.
							F   F
		542.214.740.0.1	542.24(1/2) 0 1	542.41(.)(2).2.1			
	Only the count team members shall be allowed			542.41(r)(3) Only count team members shall be			Only the count team members agents
	access to financial instrument storage component		allowed access to table game drop box	allowed access to table game drop box			shall be allowed access to financial
	contents keys during the count process.	contents keys during the count process.	contents keys during the count process.	contents keys during the count process.			instrument storage component CISC
_							contents keys during the count process.
D		•	542.31(s)(3) Only the count team members	542.41(s)(3) Only the count team members			
		shall be allowed access to bill acceptor canister	•	shall be allowed access to bill acceptor canister			
		contents keys during the count process.	contents keys during the count process.	contents keys during the count process.			
		J	1		1		

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
ILI	Section 14 - Key and Access Controls	342.21	342.31	342.41	§16	Effective: 12/21/2018	IXLI	Recommended Revisions
14.7	Kiosk Key Controls				310	Effective: 12/21/2018	14.8	Recommended Revisions
<u></u>	Controls must be established and procedures					543.17(j)(9) Controls must be	14.0	Controls must be established and
	implemented to safeguard the use, access, and					established and procedures		procedures implemented to safeguard
	security for keys for kiosks.					implemented to safeguard the use,		the use, access, and security for of keys
	security for keys for klosks.					access, and security of keys for kiosks.		for kiosks.
						decess, and security of keys for klosks.		TOT KIOSKS.
14.8	Promotional Progressive Pots and Pools						140	
14.8	Container Keys						14.9	
Δ	Promotional funds removed from the card game							
	must be placed in a locked container.							
	Agents authorized to transport the locked							
В	container are precluded from having access to the							
	contents keys.							
С	The contents key must be maintained by a							
	department independent of the card room.							
14.9	Computerized Entry Access Control Systems						14.10	
	The utilization of Computer Access Control	542.21(a) Computer applications. For any	542.31(a) Computer applications. For any	542.41(a) Computer applications. For any				
	Systems at any facility must be reviewed and	computer application utilized, alternate	computer application utilized, alternate	computer application utilized, alternate				
	approved by CNGC and must follow the	documentation and/or procedures that	documentation and/or procedures that	documentation and/or procedures that provide				
	requirements in Section 20 Information	provide at least the level of control described	provide at least the level of control described	at least the level of control described by the				
	Technology.	by the standards in this section, as approved	by the standards in this section, as approved	standards in this section, as approved by the				
	Teelinology.		by the Tribal gaming regulatory authority, will	Tribal gaming regulatory authority, will be				
		be acceptable.	be acceptable.	acceptable.				
		be deceptable.	be deceptable.	acceptable.				
		542.21(t) Gaming machine computerized key	542.31(t) Gaming machine computerized key	542.41(t) Gaming machine computerized key				
		security systems.	security systems.	security systems.				
14.10	Computerized Key Security Systems						14.11	
		542.21(u) Table games computerized key	542.31(u) Table games computerized key	542.41(u) Table games computerized key				
		security systems.	security systems.	security systems.				
		542.21(t)(1) Computerized key security systems						Computerized key security systems
		which restrict access to the gaming machine	which restrict access to the gaming machine	which restrict access to the gaming machine				which restrict access to table
	drop and count keys through the use of	drop and count keys through the use of	drop and count keys through the use of	drop and count keys through the use of				games/cards and gaming machine drop
	passwords, keys, or other means, other than a key	1	passwords, keys or other means, other than a	passwords, keys or other means, other than a				and count keys through the use of
	custodian, must provide the same degree of	key custodian, must provide the same degree	key custodian, must provide the same degree	key custodian, must provide the same degree				passwords, keys, or other means, other
	control as indicated in the key control standards of		of control as indicated in the aforementioned	of control as indicated in the aforementioned				than a key custodian, must provide the
	this section. These standards shall be applicable to		key control standards; refer to paragraphs (l),	key control standards; refer to paragraphs (l),				same degree of control as indicated in
	all tier levels.	(o), (q) and (s) of this section. Note: This	(o), (q) and (s) of this section. Note: This	(o), (q) and (s) of this section. Note: This				the key control standards of this section.
		standard does not apply to the system administrator. The system administrator is	standard does not apply to the system administrator. The system administrator is	standard does not apply to the system				These standards shall be applicable to all
		defined in paragraph (t)(2)(i) of this section.	,	administrator. The system administrator is				tier levels.
		defined in paragraph (t)(2)(i) of this section.	defined in paragraph (t)(2)(i) of this section.	defined in paragraph (t)(2)(i) of this section.				
Α		542.21(u)(1) Computerized key security	542.31(u)(1) Computerized key security	542.41(u)(1) Computerized key security systems				
		,	systems which restrict access to the table game					
		drop and count keys through the use of	drop and count keys through the use of	and count keys through the use of passwords,				
		passwords, keys or other means, other than a	passwords, keys or other means, other than a	keys or other means, other than a key				
		key custodian, must provide the same degree	key custodian, must provide the same degree	custodian, must provide the same degree of				
		of control as indicated in the aforementioned	of control as indicated in the aforementioned	control as indicated in the aforementioned key				
		key control standards; refer to paragraphs (m),		control as indicated in the alorementioned key control standards; refer to paragraphs (m), (n),				
		(n), (p) and (r) of this section. Note: This	(n), (p) and (r) of this section. Note: This	(p) and (r) of this section. Note: This standard				
		standard does not apply to the system	standard does not apply to the system	does not apply to the system administrator.				
		administrator. The system administrator is	administrator. The system administrator is	The system administrator is defined in				
		defined in paragraph (u)(2)(ii) of this section.	defined in paragraph (u)(2)(ii) of this section.	paragraph (u)(2)(ii) of this section.				
		acca in paragraph (a)(2)(ii) or this section.	action.	ps. 39. 3pr. (3/(2/(ii) 5) (iii) 300(io)i.				
			<u> </u>				l	

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
	The following table games/cards and gaming	542.21(t)(1) For computerized key security	542.31(t)(1) For computerized key security	542.41(t)(1) For computerized key security				The following table games/cards and
	machine drop and count key control procedures	systems, the following additional gaming	systems, the following additional gaming	systems, the following additional gaming				gaming machine drop and count key
	shall apply:	machine key control procedures apply:	machine key control procedures apply:	machine key control procedures apply:				control procedures shall apply:
В								
		542.21(u)(2) For computerized key security	542.31(u)(2) For computerized key security	542.41(u)(2) For computerized key security				
		systems, the following additional table game	systems, the following additional table game	systems, the following additional table game				
		key control procedures apply:	key control procedures apply:	key control procedures apply:				
	Management personnel independent of the	542.21(t)(2)(i) Management personnel	542.31(t)(2)(i) Management personnel	542.41(t)(2)(i) Management personnel				Management personnel independent of
	operational department (i.e., system administrator)	independent of the gaming machine	independent of the gaming machine	independent of the gaming machine				the operational department (i.e., system
	shall assign and control user access to keys in the	department assign and control user access to	department assign and control user access to	department assign and control user access to				administrator) shall assign and control
	computerized key security systems to ensure that	keys in the computerized key security system	keys in the computerized key security system	keys in the computerized key security system				user access to keys in the computerized
	sensitive keys are restricted to authorized	(i.e., system administrator) to ensure that	(i.e., system administrator) to ensure that	(i.e., system administrator) to ensure that				key security systems to ensure that
	employees.	gaming machine drop and count keys are	gaming machine drop and count keys are	gaming machine drop and count keys are				sensitive keys are restricted to authorized
		restricted to authorized employees.	restricted to authorized employees.	restricted to authorized employees.				employees agents.
1		542.21(u)(2)(i) Management personnel	542.31(u)(2)(i) Management personnel	542.41(u)(2)(i) Management personnel				
		independent of the table game department	independent of the table game department	independent of the table game department				
			assign and control user access to keys in the	assign and control user access to keys in the				
			computerized key security system (i.e., system	computerized key security system (i.e., system				
			administrator) to ensure that table game drop	administrator) to ensure that table game drop				
			and count keys are restricted to authorized	and count keys are restricted to authorized				
		employees.	employees.	employees.				
					16(c)(7) Emergency manual keys, such as an	543.17(j)(8) Emergency manual keys,		Emergency manual keys, such as an
					override key, for computerized, electronic, and	such as an override key, for		override key, for computerized,
					alternative key systems must be maintained in	computerized, electronic, and		electronic, and alternative key systems
					accordance with the following:	alternative key systems must be	С	must be maintained in accordance with
					decordance with the following.	maintained in accordance with the		the following:
						following:		and removing.
	In the event of an emergency or the key box is	542.21(t)(2)(ii) In the event of an emergency or	542.31(t)(2)(ii) In the event of an emergency or	542.41(t)(2)(ii) In the event of an emergency or	16(c)(7)(i) Access to the emergency manual	543.17(j)(8)(i) Access to the emergency		In the event of an emergency or the key
	inoperable, access to the emergency manual key(s	the key box is inoperable, access to the	the key box is inoperable, access to the	the key box is inoperable, access to the	key(s) used to access the box containing the	manual key(s) used to access the box		box is inoperable, aAccess to the
	(a.k.a. override key), used to access the box	emergency manual key(s) (a.k.a. override key),	emergency manual key(s) (a.k.a. override key),	emergency manual key(s) (a.k.a. override key),	player interface drop and count keys requires	containing the player interface drop		emergency manual key(s) (a.k.a. override
	containing the table games/cards and gaming	used to access the box containing the gaming	used to access the box containing the gaming	used to access the box containing the gaming	the physical involvement of at least three	and count keys requires the physical		key), used to access the box containing
	machine drop and count keys, requires the	machine drop and count keys, requires the	machine drop and count keys, requires the	machine drop and count keys, requires the	agents from separate departments, including	involvement of at least three agents		the table games/cards and gaming
	physical involvement of at least three persons	physical involvement of at least three persons	physical involvement of at least three persons	physical involvement of at least three persons	management. The date, time, and reason for	from separate departments, including		machine drop and count keys, requires
	from separate departments, including	from separate departments, including	from separate departments, including	from separate departments, including	access, must be documented with the	management. The date, time, and		the physical involvement of at least three
	management. The date, time, and reason for	management. The date, time, and reason for	management. The date, time, and reason for	management. The date, time, and reason for	signatures of all participating persons signing	reason for access, must be		persons agents from separate
	access, must be documented with the signatures	access, must be documented with the	access, must be documented with the	access, must be documented with the	out/in the emergency manual key(s);	documented with the signatures of all		departments, including management.
	of all participating employees signing out/in the	signatures of all participating employees	signatures of all participating employees	signatures of all participating employees		participating persons signing out/in		The date, time, and reason for access,
	emergency manual key(s).	signing out/in the emergency manual key(s).	signing out/in the emergency manual key(s).	signing out/in the emergency manual key(s).		the emergency manual key(s);		must be documented with the signatures
2		E42 21(u)(2)(ii) In the event of	E42.21(u)(2)(ii) In the event of	E42 41(u)(2)(ii) In the event of			1	of all participating employees agents
				542.41(u)(2)(ii) In the event of an emergency or				signing out/in the emergency manual
			the key box is inoperable, access to the	the key box is inoperable, access to the				key(s).
			emergency manual key(s) (a.k.a. override key),	emergency manual key(s) (a.k.a. override key),				
		_	used to access the box containing the table	used to access the box containing the table				
		1	game drop and count keys, requires the	game drop and count keys, requires the				
		ļ ·	physical involvement of at least three persons	physical involvement of at least three persons				
		from separate departments, including	from separate departments, including	from separate departments, including				
		management. The date, time, and reason for	management. The date, time, and reason for	management. The date, time, and reason for				
		access, must be documented with the	access, must be documented with the	access, must be documented with the				
			signatures of all participating employees	signatures of all participating employees				
		signing out/in the emergency manual key(s).	signing out/in the emergency manual key(s).	signing out/in the emergency manual key(s).				
<u> </u>				J	1	1		

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
3	The custody of the keys issued pursuant to Part 14.10 (B)(2) of this section requires the presence of two (2) persons from separate independent departments from the time of issuance until the time of their return.	f pursuant to paragraph (t)(2)(ii) of this section requires the presence of two persons from separate departments from the time of their issuance until the time of their return.  542.21(u)(2)(iii) The custody of the keys issued pursuant to paragraph (u)(2)(ii) of this section requires the presence of two persons from	542.31(t)(2)(iii) The custody of the keys issued pursuant to paragraph (t)(2)(ii) of this section requires the presence of two persons from separate departments from the time of their issuance until the time of their return.  542.31(u)(2)(iii) The custody of the keys issued pursuant to paragraph (u)(2)(ii) of this section requires the presence of two persons from separate departments from the time of their issuance until the time of their return.	542.41(t)(2)(iii) The custody of the keys issued pursuant to paragraph (t)(2)(ii) of this section requires the presence of two persons from separate departments from the time of their issuance until the time of their return.  542.41(u)(2)(iii) The custody of the keys issued pursuant to paragraph (u)(2)(ii) of this section requires the presence of two persons from separate departments from the time of their issuance until the time of their return.	16(c)(7)(ii) The custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return; and	543.17(j)(8)(ii) The custody of the emergency manual keys requires the presence of two agents from separate departments from the time of their issuance until the time of their return; and	2	The custody of the emergency manual keys issued pursuant to Part 14.10 (B)(2) of this section requires the presence of two (2) persons agents from separate independent departments from the time of issuance until the time of their return.
4	Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).	that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).  542.21(t)(2)(iv) Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all	542.31(t)(2)(iv) Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).  542.31(t)(2)(iv) Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).	542.41(t)(2)(iv) Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).  542.41(t)(2)(iv) Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the table games drop and count keys, only requires the presence of two persons from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees signing out/in the emergency manual key(s).		(j)(8)(iii) Routine physical maintenance that requires access to the emergency manual key(s), and does not involve accessing the gaming machine drop and count keys, only requires the presence of two agents from separate departments. The date, time, and reason for access must be documented with the signatures of all participating agents signing out/in the emergency manual key(s).	3	Routine physical maintenance that requires accessing the emergency manual key(s) (override key) and does not involve the accessing of the gaming machine drop and count keys, only requires the presence of two persons (2) agents from separate departments. The date, time and reason for access must be documented with the signatures of all participating employees agents signing out/in the emergency manual key(s).
C	For computerized key security systems controlling access to table games/cards and gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:	systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:  542.21(u)(3) For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will	542.31(t)(3) For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:  542.31(u)(3) For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:	542.41(t)(3) For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:  542.41(u)(3) For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:	13(d)(5)(iii) For computerized key security systems controlling access to drop and count keys, perform the following procedures:			For computerized key security systems- controlling access to table games/cards- and gaming — machine drop and count- keys, accounting/audit personnel, independent of the system- administrator, will perform the following- procedures:

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
IXLI	Section 14 - Key and Access Controls	342.21	342.31	572.71	§16	Effective: 12/21/2018	KLI	Recommended Revisions
	,	542.21(t)(3)(i) <b>Daily</b> , review the report	542.31(t)(3)(i) <b>Daily</b> , review the report	542.41(t)(3)(i) <b>Daily,</b> review the report	13(d)(5)(iii)(A) <b>At least quarterly,</b> review the	Lifective. 12/21/2010		Daily, review the report generated by the
	computerized key security system indicating the	generated by the computerized key security	generated by the computerized key security	generated by the computerized key security	report generated by the computerized key			computerized key security system
	transactions performed by the individual(s) that	system indicating the transactions performed	system indicating the transactions performed	system indicating the transactions performed	security system indicating the transactions			indicating the transactions performed by
	adds, deletes, and changes user's access within the	,	by the individual(s) that adds, deletes, and	by the individual(s) that adds, deletes, and	performed by the individual(s) that adds,			the individual(s) that adds, deletes, and
	system (i.e., system administrator). Determine	changes user's access within the system (i.e.,	changes user's access within the system (i.e.,	changes user's access within the system (i.e.,	deletes, and changes users' access within the			changes user's access within the system
	whether the transactions completed by the system	,	system administrator). Determine whether the	system administrator). Determine whether the	system (i.e., system administrator). Determine			(i.e., system administrator). Determine
	administrator provide an adequate control over	transactions completed by the system	transactions completed by the system	transactions completed by the system	whether the transactions completed by the			whether the transactions completed by
	the access to the gaming machine drop and count		administrator provide an adequate control	administrator provide an adequate control over	, ,			the system administrator provide an
	keys. Also, determine whether any table	over the access to the gaming machine drop	over the access to the gaming machine drop	the access to the gaming machine drop and	over the access to the drop and count keys.			adequate control over the access to the
	games/cards and gaming machine drop and count	3 3 .	and count keys. Also, determine whether any	count keys. Also, determine whether any	Also, determine whether any drop and count			gaming machine drop and count keys.
		gaming machine drop and count	gaming machine drop and count	gaming machine drop and count	key(s) removed or returned to the key cabinet			Also, determine whether any table
	the system administrator was properly authorized.	,	key(s)removed or returned to the key cabinet	key(s)removed or returned to the key cabinet	by the system adminstrator was properly			games/cards and gaming machine drop
1		by the system administrator was properly	by the system administrator was properly	by the system administrator was properly	authorized;			and count key(s) removed or returned to
		authorized.	authorized.	authorized.	·			the key cabinet by the system
								administrator was properly authorized.
		542.21(u)(3)(i) <b>Daily</b> , review the report	542.31(u)(3)(i) <b>Daily</b> , review the report	542.41(u)(3)(i) Daily, review the report				,
		generated by the computerized key security	generated by the computerized key security	generated by the computerized key security				
		system indicating the transactions performed	system indicating the transactions performed	system indicating the transactions performed				
1		by the individual(s) that adds, deletes, and	by the individual(s) that adds, deletes, and	by the individual(s) that adds, deletes, and				
		changes user's access within the system (i.e.,	changes user's access within the system (i.e.,	changes user's access within the system (i.e.,				
		system administrator). Determine whether the	system administrator). Determine whether the	system administrator). Determine whether the				
		transactions completed by the system	transactions completed by the system	transactions completed by the system				
		administrator provide an adequate control	administrator provide an adequate control	administrator provide an adequate control over	r			
		over the access to the table games drop and	over the access to the table games drop and	the access to the table games drop and count				
	For at least one day each month, review the	542.21(t)(3)(ii) For at least one day each	542.31(t)(3)(ii) For at least one day each	542.41(t)(3)(ii) For at least one day each	13(d)(5)(iii)(B) At least quarterly, review the			For at least one day each month, review
	report generated by the computerized key security	month, review the report generated by the	month, review the report generated by the	month, review the report generated by the	report generated by the computerized key			the report generated by the
	system indicating all transactions performed to	computerized key security system indicating all	computerized key security system indicating al	II computerized key security system indicating all	security system indicating all transactions			computerized key security system
	determine whether any unusual table games/cards	transactions performed to determine whether	transactions performed to determine whether	transactions performed to determine whether	performed to determine whether any unusual			indicating all transactions performed to
	and gaming machine drop and count key	any unusual gaming machine drop and count	any unusual gaming machine drop and count	any unusual gaming machine drop and count	drop and count key removals or key returns			determine whether any unusual table
	removals or key returns occurred.	key removals or key returns occurred.	key removals or key returns occurred.	key removals or key returns occurred.	occurred; and			games/cards and gaming machine drop
2								and count key removals or key returns
2		542.21(u)(3)(ii) For at least one day each	542.31(u)(3)(ii) For at least one day each	542.41(u)(3)(ii) For at least one day each				occurred.
		month, review the report generated by the	month, review the report generated by the	month, review the report generated by the				
		, , , , , , , , , , , , , , , , , , , ,	1	1				
		transactions performed to determine whether	transactions performed to determine whether	transactions performed to determine whether				
		any unusual table games drop and count key	any unusual table games drop and count key	any unusual table games drop and count key				
		removals or key returns occurred.	removals or key returns occurred.	removals or key returns occurred.				
	1	542.21(t)(3)(iii) At least quarterly, review a	542.31(t)(3)(iii) At least quarterly, review a	542.41(t)(3)(iii) At least quarterly, review a	13(d)(5)(iii)(C) At least quarterly, review a			At least quarterly, review a sample of
1		sample of users that are assigned access to the		1 .				users that are assigned access to the
1		gaming machine drop and count keys to	gaming machine drop and count keys to	gaming machine drop and count keys to	drop and count keys to determine that their			table games/cards and gaming machine
1	determine that their access to the assigned keys is		determine that their access to the assigned	determine that their access to the assigned	access to the assigned keys is appropriate			drop and count keys to determine that
	adequate relative to their job position.	keys is adequate relative to their job position.	keys is adequate relative to their job position.	keys is adequate relative to their job position.	relative to their job position.			their access to the assigned keys is
3		E42 21(.)(2)(iii) A(	E42.21()(2)(!!!) A:	E42 41(-)/2)/(ii) A+1				adequate relative to their job position.
		542.21(u)(3)(iii) At least quarterly, review a	542.31(u)(3)(iii) At least quarterly, review a	542.41(u)(3)(iii) At least quarterly, review a				
1		_		sample of users that are assigned access to the				
				table games drop and count keys to determine				
		that their access to the assigned keys is	that their access to the assigned keys is	that their access to the assigned keys is				
1		adequate relative to their job position.	adequate relative to their job position.	adequate relative to their job position.				
1		542.21(t)(3)(iv) All noted improper transactions						All noted improper transactions or
1		or unusual occurrences are investigated with	or unusual occurrences are investigated with	or unusual occurrences are investigated with				unusual occurrences are investigated
4	documented.	the results documented.	the results documented.	the results documented.				with the results documented.
4		542.21( )(2)(5 ) All	542.24 ( )(2)(; ) All	542 44 ( )(2)(1) All				
				s 542.41(u)(3)(iv) All noted improper transactions				
		or unusual occurrences are investigated with	or unusual occurrences are investigated with	or unusual occurrences are investigated with				
<b>Г</b>	1	the results documented.	the results documented.	the results documented.				

REF	CN TICS	542.21	542.31	542.41	NIGC Class III Guidance	543 Final Rule	REF	
	Section 14 - Key and Access Controls				§16	Effective: 12/21/2018		Recommended Revisions
	Quarterly, an inventory of all count room, table	542.21(t)(4) Quarterly, an inventory of all count	542.31(t)(4) Quarterly, an inventory of all count	t 542.31(t)(4) Quarterly, an inventory of all count	13(d)(5)(iv) At least quarterly, an inventory of all			Quarterly, an inventory of all count room,
	games drop box and financial instrument storage	room, drop box release, storage rack and	room, drop box release, storage rack and	room, drop box release, storage rack and	controlled keys must be performed and			table games drop box and financial
	component release, storage rack and contents	contents keys is performed, and reconciled to	contents keys is performed, and reconciled to	contents keys is performed, and reconciled to	reconciled to records of keys made, issued, and			instrument storage component release,
	keys is performed, and reconciled to records of	records of keys made, issued, and destroyed.	records of keys made, issued, and destroyed.	records of keys made, issued, and destroyed.	destroyed. Investigations must be performed			storage rack and contents keys is
	keys made, issued, and destroyed. Investigations	Investigations are performed for all keys	Investigations are performed for all keys	Investigations are performed for all keys	for all keys unaccounted for, and the			performed, and reconciled to records of
	are performed for all keys unaccounted for, with	unaccounted for, with the investigation being	unaccounted for, with the investigation being	unaccounted for, with the investigation being	investigation documented.			keys made, issued, and destroyed.
	the investigation being documented.	documented.	documented.	documented.				Investigations are performed for all keys
D								unaccounted for, with the investigation
		542.21(u)(4) Quarterly, an inventory of all count	542.31(u)(4) Quarterly, an inventory of all coun	t 542.31(u)(4) Quarterly, an inventory of all count	t			being documented.
		room, table game drop box release, storage	room, table game drop box release, storage	room, table game drop box release, storage				
		rack and contents keys is performed, and	rack and contents keys is performed, and	rack and contents keys is performed, and				
		reconciled to records of keys made, issued, and	reconciled to records of keys made, issued, and	d reconciled to records of keys made, issued, and	i			
		destroyed. Investigations are performed for all	destroyed. Investigations are performed for all	destroyed. Investigations are performed for all				
		keys unaccounted for, with the investigations	keys unaccounted for, with the investigations	keys unaccounted for, with the investigations				
		being documented.	being documented.	being documented.				

REF		NIGC Class III Guidance	543	Tribal - State Compact		Recommended Revisions
	Section 15 - Gaming Promotions	BULLETIN 2018-3				
15.1	Standards for Gaming Promotions	§6				General Standards for Gaming Promotions.
A	Supervision. Supervision must be provided as needed for gaming promotions by an agent(s) with authority equal to or greater than those being supervised.	Supervision. Supervision must be provided as needed for gaming promotions and player tracking by an agent(s) with authority equal to or greater than those being supervised.  §6(a)	Supervision. Supervision must be provided as needed for gaming promotions and player tracking by an agent(s) with authority equal to or greater than those being supervised. 543.12 (a)			Supervision. Supervision must be provided as needed for gaming promotions by an agent(s with authority equal to or greater than those being supervised.
В	Gaming promotions. Gaming promotions shall be conducted in accordance with any applicable advertising, promotional, and/or marketing standards set forth in the Cherokee Nation Code. The rules of the gaming promotion must be displayed or made readily available to patron upon request. Gaming promotions rules require CNGC approval and must include the following:	Gaming promotions. The rules of the gaming promotion must be displayed or made readily available to patron upon request. Gaming promotions rules require TGRA approval and must include the following: §6(b)	Gaming promotions. The rules of the gaming promotion must be displayed or made readily available to patron upon request. Gaming promotions rules require TGRA approval and must include the following: 543.12 (b)		A	Gaming promotions. Gaming promotions shall be conducted in accordance with any applicable advertising, promotional, and/or marketing standards set forth in the Cherokee Nation Code. The rules of the gaming promotion must be displayed or made readily available to patron upon request. Gaming promotions rules require CNGC approval and must include the following:
1	The rules of play;	The rules of play; §6(b)(1)	The rules of play; 543.12 (b)(1)			
2	The nature and value of the associated prize(s) or cash award(s);	The nature and value of the associated prize(s) or cash award(s); §6(b)(2)	The nature and value of the associated prize(s) or cash award(s); 543.12 (b)(2)			

REF		NIGC Class III Guidance	543	Tribal - State Compact		Recommended Revisions
	Section 15 - Gaming Promotions	BULLETIN 2018-3		·		
3	Any restrictions or limitations on participant eligibility;	Any restrictions or limitations on participant eligibility; §6(b)(3)	Any restrictions or limitations on participant eligibility; 543.12 (b)(3)			
4	The date(s), time(s), and location(s) for the associated promotional activity or activities;	The date(s), time(s), and location(s) for the associated promotional activity or activities; \$6(b)(4)	The date(s), time(s), and location(s) for the associated promotional activity or activities; 543.12 (b)(4)			
5	Any other restrictions or limitations, including any related to the claim of prizes or cash awards;	Any other restrictions or limitations, including any related to the claim of prizes or cash awards; \$6(b)(5)	Any other restrictions or limitations,			
6	The announcement date(s), time(s), and location(s) for the winning entry or entries; and	The announcement date(s), time(s), and location(s) for the winning entry or entries; and \$6(b)(6)	The announcement date(s), time(s), and location(s) for the winning entry or entries; and 543.12 (b)(6)			
7	Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties.	Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties. \$6(b)(7)	Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties. 543.12 (b)(7)			
C	Complaints and disputes regarding marketing programs are subject to the CNGC dispute resolution rules and regulations and/or the prize claim procedures under the approved Tribal-State Compact.  Procedures for Redemption			TORT CLAIMS; PRIZE CLAIMS; LIMITED CONSENT TO SUIT Specific language is listed within the Compact regarding prize claims but is too lengthy to include in this document. The prize claim language can be provided upon request.  Tribal-State Compact Part 6 (B)(C)	В	

REF		NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revisions
	Section 15 - Gaming Promotions	BULLETIN 2018-3			
	The procedures for the redemption of coupon,				
	complimentaries, vouchers, tickets, or similar				
	gaming promotion items shall comply with				
	Section 11 – Casino Instruments and Exchanges				
	and Section 4 General Provisions – Currency				
	Handling of this document, as applicable.				
15.3	Variances				
	The operation must establish, as approved by	Variances. The operation must establish,	Variances. The operation must establish,		
	the CNGC, the threshold level at which a	as approved by the TGRA, the threshold	as approved by the TGRA, the threshold		
	variance must be reviewed to determine the	level at which a variance must be reviewed	level at which a variance must be		
	cause. Any such review must be documented	to determine the cause. Any such review	reviewed to determine the cause. Any		
	and made available to CNGC upon request.	must be documented.	such review must be documented.		
		§6(d)	543.12 (d)		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
16.1	Standards for Complimentary					General Standards for Complimentary
10.1	Services/Items					Services/Items
А	Supervision. Supervision must be provided as needed for approval of complimentary services by an agent(s) with authority equal to or greater than those being supervised.		Supervision. Supervision must be provided as needed for approval of complimentary services by an agent(s) with authority equal to or greater than those being supervised. §7(a)	Supervision. Supervision must be provided as needed for approval of complimentary services by an agent(s) with authority equal to or greater than those being supervised.  543.13 (a)		Supervision. Supervision must be provided as needed for approval of complimentary services by an agent(s) with authority equal to or greater than those being supervised.
В	CNGC or the gaming operation shall establish and the gaming operation shall comply with procedures for the authorization, issuance, and tracking of complimentary services and items, including cash and non-cash gifts.	Each Tribal gaming regulatory authority or gaming operation shall establish and the gaming operation shall comply with procedures for the authorization, issuance, and tracking of complimentary services and items, including cash and non-cash gifts. 542.17 (a)	Complimentary services or items. Controls must be established and procedures implemented for complimentary services or items that address the following: §7(b)	Complimentary services or items. Controls must be established and procedures implemented for complimentary services or items that address the following: 543.13(b)	А	The CNGC or the gaming operation shall establish controls and the gaming operation shall implement and comply with procedures for the authorization, issuance, and tracking of complimentary services and items, including cash and non-cash gifts.
С	Such procedures must be approved by the CNGC and shall include, but shall not be limited to:	Such procedures must be approved by the Tribal gaming regulatory authority and shall include, but shall not be limited to542.17(a)		SICS. Each gaming operation must develop SICS, as approved by the TGRA, to implement the TICS. 543.3(c)		
1	The procedures by which the gaming operation delegates to its employees the authority to approve the issuance of complimentary services and items;	the procedures by which the gaming operation delegates to its employees the authority to approve the issuance of complimentary services and items 542.17(a)			1	The procedures by which the gaming operation delegates to its agents employees the authority to approve the issuance of complimentary services and items;
			Agents authorized to approve the issuance of complimentary services or items, including levels of authorization; §7(b)(1)	Agents authorized to approve the issuance of complimentary services or items, including levels of authorization; 543.13 (b)(1)	2	A listing of the agents authorized to approve the issuance of complimentary services or items, including levels of authorization;
2	The procedures by which conditions or limits, if any, which may apply to such authority are established and modified (including limits based on relationships between the authorizer and recipient); and,	1	Limits and conditions on the approval and issuance of complimentary services or items; §7(b)(2)	Limits and conditions on the approval and issuance of complimentary services or items; 543.13(b)(2)	3	The procedures by which conditions or limits, if any, which may apply to such authority are established and modified (including limits based on relationships between the authorizer and recipient); and,
			Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items; §7(b)(3)	Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items; 543.13(b)(3)	4	The procedures for making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items;

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
			Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts; §7(b)(4)	Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts; 543.13(b)(4)	5	The procedures for documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts; and,
	Shall further include effective provisions for					Procedures shall further include effective provisions for
3	audit purposes.	shall further include effective provisions			6	audit purposes.
		for audit purposes. 542.17(a)				
D	Complimentary services and items. Services and items provided to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the gaming operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses. Complimentary services and items exclude any services and/or items provided, at no cost or at a reduced cost, to a person for business and/or governmental purposes, which are categorized and treated as business expenses of the gaming operation.	Complimentary means a service or item provided at no cost, or at a reduced cost to a customer. 542.2		Complimentary services and items. Services and items provided to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the gaming operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses. 543.2		Complimentary services and items. Services and items provided at no cost, or at a reduced cost to a patron at the discretion of an agent on behalf of the gaming operation or by a third party on behalf of the gaming operation. Services and items may include, but are not limited to, travel, lodging, food, beverages, or entertainment expenses. Complimentary services and items exclude any services and/or items provided, at no cost or at a reduced cost, to a person for business and/or governmental purposes, which are categorized and treated as business expenses of the gaming operation.

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
	At least monthly, accounting, information	At least monthly, accounting, information	Records must include the following for	A detailed reporting of complimentary services		At least monthly, accounting, information technology,
	technology, or audit personnel that cannot	technology, or audit personnel that cannot	all complimentary items and services	or items transactions that meet an established		or audit personnel that cannot grant or receive
	grant or receive complimentary privileges	grant or receive complimentary privileges	equal to or exceeding an amount	threshold approved by the TGRA must be		complimentary privileges shall prepare reports that
	shall prepare reports that include the	shall prepare reports that include the	established by the gaming operation and	prepared at least monthly. 543.13(c)(1)		include the following information for all complimentary
	following information for all complimentary	following information for all complimentary	approved by the TGRA: §7(b)(4)(i)			items and services equal to or exceeding \$100 or an
	items and services :	items and services equal to or exceeding		Complimentary services and items records		amount established by the CNGC, which shall not be-
		\$100 or an amount established by the Tribal		must be summarized and reviewed for proper		greater than \$100 that meet an established threshold
		gaming regulatory authority, which shall not		authorization and compliance with established		approved by the CNGC:
		be greater than \$100:		authorization thresholds.		
Е		542.17 (b)		543.13(c)	Е	
				Records must include the following for all		
				complimentary items and services equal to or		
				exceeding an amount established by the		
				gaming operation and approved by the TGRA:		
				543.13(b)(4)(i)		
	Name of customer who received the	Name of customer who received the	Name of patron who received the	Name of patron who received the		Name of patron <del>customer</del> who received the
1	complimentary service or item;	complimentary service or item;	complimentary service or item;	complimentary service or item;	1	complimentary service or item;
		542.17 (b)(1)	§7((b)(4)(i)(A)	543.13(b)(4)(i)(A)		
	Name(s) of authorized issuer of the	Name(s) of authorized issuer of the	Name(s) of issuer(s) of the	Name(s) of issuer(s) of the complimentary		
2	complimentary service or item;	complimentary service or item;	complimentary service or item;	service or item; 543.13(b)(4)(i)(B)		
			§7((b)(4)(i)(B)			
	The actual cash value of the complimentary	The actual cash value of the complimentary	The actual cash value of the	The actual cash value of the complimentary		
3	service or item;	service or item;	complimentary service or item;	service or item; 543.13(b)(4)(i)(C)		
			§7((b)(4)(i)(C)			
	The type of complimentary service or item	, ,	The type of complimentary service or	The type of complimentary service or item (i.e.,		
4	(i.e., food, beverage, etc.); and	(i.e., food, beverage, etc.); and	item (i.e., food, beverage); and	food, beverage); and 543.13(b)(4)(i)(D)		
			§7((b)(4)(i)(D)			
_	' '	·	Date the complimentary service or item	Date the complimentary service or item was		
5	issued.		was issued.	issued. 543.13(b)(4)(i)(E)		
<u> </u>		542.17 (b)(5)	§7((b)(4)(i)(E)	T	-	
				The detailed report must be forwarded to		The detailed report must be forwarded to management
				management for review.	6	for review.
				543.13(c)(2)		

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
F	available to the Nation, CNGC, other entity designated by the Nation, and the National	least monthly. These reports shall be made		Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds. 543.13(c)	F	The internal audit or accounting departments shall review the reports required in Section 16.1 (E) of this section for proper authorization and compliance with established authorization thresholds at least monthly. These reports shall be made available to the Nation, CNGC, other entity designated by the Nation, and the National Indian Gaming Commission upon request.
G	Controls must be established and procedures implemented for complimentary services or items that address the following:			Complimentary services or items. Controls must be established and procedures implemented for complimentary services or items that address the following: 543.13 (b)		Controls must be established and procedures- implemented for complimentary services or items that address the following:
1	Agents authorized to approve the issuance of complimentary services or items, including levels of authorization;			Agents authorized to approve the issuance of complimentary services or items, including levels of authorization; 543.13 (b)(1)		Agents authorized to approve the issuance of complimentary services or items, including levels of authorization;
2	Limits and conditions on the approval and issuance of complimentary services or items;			Limits and conditions on the approval and issuance of complimentary services or items; 543.13 (b)(2)		Limits and conditions on the approval and issuance of complimentary services or items;
3	Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items;			Making and documenting changes to conditions or limits on the approval and issuance of complimentary services or items; 543.13 (b)(3)		Making and documenting changes to conditions or- limits on the approval and issuance of complimentary- services or items;

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
4	Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts.			Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts; 543.13 (b)(4)		Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts.
н	Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.		Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.  §7(c)	Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds. 543.13 (c)		Complimentary services and items records must be summarized and reviewed for proper authorization and compliance with established authorization thresholds.
1	A detailed reporting of complimentary services or items transactions that meet an established threshold approved by the CNGC must be prepared at least monthly.		A detailed reporting of complimentary services or items transactions that meet an established threshold approved by the TGRA must be prepared at least monthly.  §7(c)(1)	A detailed reporting of complimentary services or items transactions that meet an established threshold approved by the TGRA must be prepared at least monthly. 543.13(c)(1)		A detailed reporting of complimentary services or itemstransactions that meet an established threshold approved by the CNGC must be prepared at least monthly.
2	The detailed report must be forwarded to management for review.		The detailed report must be forwarded to management for review. §7(c)(2)	The detailed report must be forwarded to management for review. 543.13(c)(2)		The detailed report must be forwarded to management- for review.

REF	CN TICS	542	NIGC Class III Guidance	543	REF	CN TICS
	Section 16 - Complimentaries		BULLETIN 2018-3			Section 16 - Complimentaries
	Variances. The operation must establish, as		Variances. The operation must establish,	Variances. The operation must establish, as		
	approved by the CNGC, the threshold level		as approved by the TGRA, the threshold	approved by the TGRA, the threshold level at		
	at which a variance must be reviewed to		level at which a variance must be	which a variance must be reviewed to		
I	determine the cause. Any such review must		reviewed to determine the cause. Any	determine the cause. Any such review must be		
	be documented and made available to		such review must be documented. §7(d)	documented.		
	CNGC upon request.			543.13(d)		
16.2	Redemption Procedures					Redemption Procedures
	The procedures for redeeming-			543.13 (b)(4)		The procedures for redeeming complimentary
	complimentary services/items, shall comply-					services/items, shall comply with the standards as set
	with the standards as set forth in Section 11					forth in Section 11 – Casino Instruments and Section 4
	- Casino Instruments and Section 4 General					General Provisions, as applicable.
	<del>Provisions, as applicable.</del>					

REF	REF		NIGC Class III Guidance	542	543	REF	
		Section 17 - Player Tracking Systems	BULLETIN 2018-3 §6	2.5			
17.1		Standards for Player Tracking System	(c) Player tracking systems and gaming promotions				General Standards for Player Tracking System
А	Α	Supervision. Supervision must be provided as needed	Supervision. Supervision must be provided as needed for		543.12 (a) <i>Supervision</i> . Supervision must be provided as needed for gaming promotions and player tracking by an agent(s) with authority equal to or greater than those being supervised.		Supervision. Supervision must be provided as needed- for player tracking by an agent(s) with authority equal- to or greater than those being supervised.
В	В	The player tracking system shall be secured so as to prevent unauthorized access (e.g., changing passwords at least quarterly and physical access to computer hardware, etc.).		542.13 (j)(1)(i) <i>Player tracking system</i> . The <b>following standards apply</b> if a player tracking system is utilized: (i) The player tracking system shall be secured so as to prevent unauthorized access (e.g., changing passwords at least quarterly and physical access to computer hardware, etc.).		А	
17.2						17.2	Terms and Conditions
Α						А	Terms and conditions for player tracking (players club) membership must be submitted and approved by the CNGC.
В				542.13(o)(4) Customer account generation standards:		В	Customer account generation standards:
1				542.13(o)(4)(i) A computer file for each customer shall be prepared by a clerk, with no incompatible functions, prior to the customer being issued an account access card to be utilized for machine play.		1	A computer file for each customer shall be prepared by an employee, with no incompatible functions, prior to the customer being issued an account.
2				542.13(o)(4)(i) The customer may select his/her PIN to be used in conjunction with the account access card.		2	For each account, the system shall require a unique player identification.
3				542.13(o)(4)(ii) For each customer file, an employee shall, at a minimum:		3	For each customer file, an employee shall, at a minimum:
a				542.13(o)(4)(ii)(A) Record the customer's name and current address.		a	Record the customer's name, current address, and date of birth;

REF	REF		NIGC Class III Guidance	542	543	REF	
1121	1	Section 17 - Player Tracking Systems	BULLETIN 2018-3 §6	5.2	3.5	1	
				542.13(o)(4)(ii)(B) The date the account was opened; and		b	The date the account was opened; and
b				542.13(o)(4)(ii)(C) At the time the initial deposit is made, account opened or credit extended, the identity of the customer shall be verified by examination of a valid driver's license or other reliable identity credential.		С	At the time the account opened or a change is made to the player's account, the identity of the customer shall be verified by examination of a valid driver's license or other reliable identity credential.
C	С	Changes to the player tracking system parameters, such as point structures and employee access, shall be performed by supervisory employees independent of the gaming machine department. Alternatively, changes to player tracking system parameters may be performed by gaming machine supervisory employees if sufficient documentation is generated and it is randomly verified by supervisory employees independent of the gaming machine department on a monthly basis.		542.13 (j)(1)(iv) Changes to the player tracking system parameters, such as point structures and employee access, shall be performed by supervisory employees independent of the gaming machine department. Alternatively, changes to player tracking system parameters may be performed by gaming machine supervisory employees if sufficient documentation is generated and it is randomly verified by supervisory employees independent of the gaming machine department on a monthly basis.			
D	D	and external bonusing system parameters, which control features such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, coupons and vouchers, must be performed under the authority of supervisory agents, independent of the department initiating the change. Alternatively, the changes may be performed by supervisory agents of the department initiating the change if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory agents independent of the department initiating the change	Changes to the player tracking systems, promotion and external bonusing system parameters—which control features such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, coupons and vouchers—must be documented and performed under the authority of supervisory agents independent of the department initiating the change. Alternatively, the changes may be performed by supervisory agents of the department initiating the change if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory agents independent of the department initiating the change on a monthly basis.  §6(c)(1)		543.12 (c)(1) Player tracking systems and gaming promotions. Changes to the player tracking systems, promotion and external bonusing system parameters, which control features such as the awarding of bonuses, the issuance of cashable credits, non-cashable credits, coupons and vouchers, must be performed under the authority of supervisory agents, independent of the department initiating the change. Alternatively, the changes may be performed by supervisory agents of the department initiating the change if sufficient documentation is generated and the propriety of the changes are randomly verified by supervisory agents independent of the department initiating the change on a monthly basis.		

REF	REF		NIGC Class III Guidance	542	543	REF	
		Section 17 - Player Tracking Systems	BULLETIN 2018-3 §6	5.12		-\	
E	E	The addition of points to members' accounts other than through actual gaming machine play shall be sufficiently documented (including substantiation of reasons for increases) and shall be authorized by a department independent of the player tracking and gaming machines. Alternatively, addition of points to members' accounts may be authorized by gaming machine supervisory employees if sufficient documentation is generated and it is randomly verified by employees independent of the gaming machine department on a quarterly basis.	Changes to individual player tracking accounts other than through an automated process related to actual play must be sufficiently documented (including substantiation of reasons for increases) and authorized or performed by supervisory agents. An addition, deletion, or change to individual player tracking accounts must be authorized by supervisory agents and documented and randomly verified by accounting or audit personnel on a quarterly basis.  §6(c)(2)	play shall be sufficiently documented (including substantiation of reasons for increases) and shall be authorized by a department independent of the player tracking and gaming machines. Alternatively, addition of points to members' accounts may be authorized by gaming machine supervisory employees if sufficient documentation is generated and it is randomly verified by employees independent of the gaming machine department on a quarterly basis.			
F	F	All other changes to the player tracking system shall be appropriately documented.	All other changes to the player tracking system must be appropriately documented. §6(c)(3)	542.13 (j)(1)(v) All other changes to the player tracking system shall be appropriately documented.	543.12 (c)(2) All other changes to the player tracking system must be appropriately documented.		
G	G	Variances. The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented and made available to CNGC upon request.	Variances. The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.  §6(d)		543.12 (d) <i>Variances</i> . The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.		
Н.						Н	Where player tracking records are utilized for Financial Transaction reporting, Section 18 – Financial Transactions shall apply.
17. <del>2</del> 3	17.2	Redemption Procedures				17.3	
А	Α	When redeeming player points, cashiers shall follow the standards in Section 11 – Casino Instruments & Exchanges and Section 4 General Provisions of this document.					
В	В	Employees who redeem points for members shall be allowed to receive lost players club cards, provided that they are immediately deposited into a secured container for retrieval by independent personnel.		542.13 (j)(1)(iii) Booth employees who redeem points for members shall be allowed to receive lost players club cards, provided that they are immediately deposited into a secured container for retrieval by independent personnel.			
С				542.13(o)(4)(iii) For player accounts that provide for customer access, bonusing, and/or self-redemption, account access shall be protected by use of a Personal Identification Number (PIN), as applicable.		С	For player accounts that provide for patron access, bonusing, and/or self-redemption, account access shall be protected by use of a Personal Identification Number (PIN), as applicable.
1				542.13(o)(4)(i) The customer shall select his/her PIN to be used in conjunction with the player account access card (i.e. players club membership card).		1	The patron shall select his/her PIN to be used in conjunction with the player account access card (i.e. players club membership card).

REF	REF		NIGC Class III Guidance	542	543	REF	
		Section 17 - Player Tracking Systems	BULLETIN 2018-3 §6				
				542.13(o)(4)(iv) After entering a specified number of			After entering three (3) sequential incorrect PIN entries,
				incorrect PIN entries at the cage or player terminal,			the patron must be directed to the appropriate station
				the customer shall be directed to proceed to a clerk			to obtain a new PIN by providing proper identification.
2				to obtain a new PIN. If a customer forgets, misplaces		2	
				or requests a change to their PIN, the customer shall			
				proceed to a clerk for assistance.			
				542.13(o)(4)(iv) After entering a specified number of			If the patron forgets, misplaces, or requests a change
				incorrect PIN entries at the cage or player terminal,			to their PIN, the same standard shall apply.
				the customer shall be directed to proceed to a clerk			
3				to obtain a new PIN. If a customer forgets, misplaces		3	
				or requests a change to their PIN, the customer shall			
				proceed to a clerk for assistance.			

	542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions		1021	1010				Revision
Definitions (for this Section).							
	542.3(c)(2) Tribal internal control						
	standardsEach Tribal gaming						
	regulatory authority shall, in accordance						
	with the Tribal gaming ordinance,						
	establish and implement tribal internal						
	control standards that shall: Contain						
	standards for currency transaction						
	reporting that comply with 31 CFR part						
	102-						
Definitions used in previous and subsequent sections retain their meaning		1021.100 Refer to §1010.100 of this chapter for general definitions not	1010.100 General definitions.				
unless modified below:		noted herein. To the extent there is a differing definition in §1010.100 of					
		this chapter, the definition in this section is what applies to part 1021.					
		Unless otherwise indicated, for purposes of this part:					
		· · · · ·					
Business Year – the annual accounting period, such as a calendar or fiscal		1021.100(a) Business year means the annual accounting period, such as					
year, by which a casino maintains its books and records for purposes of this		calendar or fiscal year, by which a casino maintains its books and records					
Section.		for purposes of subtitle A of title 26 of the United States Code.					
Casino/Gaming facility – any organization licensed to do business as a			1010.100(t)(5)(i) Casino. A casino or gambling				Casino/Gaming facility - any organization lic
casino in the Cherokee Nation. It includes the principal headquarters and eve	ery		casino that: Is duly licensed or authorized to do				to do business as a casino in the Cherokee Na
domestic branch or other place of business of the casino. Under Title 31, any	- 1		business as such in the United States, whether			1	includes the principal headquarters and every
requirements specific to casinos refers to any casino that has gross annual			under the laws of the State or of a Territory or				domestic branch or other place of business of
gaming revenue in excess of One Million Dollars (\$1,000,000.00) during eithe	er .		Insular Possession of the United States, or under			1	casino. Under Title 31, any requirements speci
							2
the previous or current business year.			the Indian Gaming Regulatory Act or other				casinos refers to any casino that has gross ann
			Federal, State, or tribal law or arrangement				gaming revenue in excess of One Million Dolla
			affecting Indian lands (including, without				(\$1,000,000.00) during either the previous or o
			limitation, a casino operating on the assumption				business year.
			or under the view that no such authorization is				
			required for casino operation on Indian lands); and				
			has gross annual gaming revenue in excess of \$1				
			million. The term includes the principle				
			headquarters and every domestic branch of place				
			of business of the casino.				
			of business of the casino.				
Casino Account Number – means any and all numbers by which a casino		1021.100(b) Casino account number means any and all numbers by					
identifies a customer.		which a casino identifies a customer.					
Currency – the coin and paper money of the United States or any other			1010.100(m) Currency. The coin and paper	Currency - The coin and paper money of the			
country that is designated as legal tender and that circulates and is			money of the United States or of any other	United States or any other country, which is			
customarily used and accepted as money in the country it is issued.			country that is designated legal tender and that	circulated and customarily used and accepted as			
			circulates and is customarily used and accepted as	money. FinCEN CTR E-Filing v1.3(C)(7)			
			a medium of exchange in the country of issuance.				
			Currency includes U.S. silver certificates, U.S. notes				
			and Federal Reserve notes. Currency also includes				
			official foreign bank notes that are customarily				
			used and accepted as a medium of exchange in a				
			foreign country.				
Customer – includes every person who is involved in a financial transaction t	0	1021.100(c) Customer includes every person which is involved in a					Modify - we will use Patron.
which Title 26 and Title 31 applies whether or not that person participates in		transaction to which this chapter applies with a casino, whether or not				1	· ·
the gaming activities offered by the casino.		that person participates, or intends to participate, in the gaming activities				1	
gamming dearnass streets by the cusino.		offered by that casino.				1	
Established Customer – a person with an account established with the casin	0	Official by trial casino.	1010.100(p) Established customer. A person with			1	
·			an account with the financial institution, including			1	
including a player tracking account, credit or deposit account, or a person wi			_			1	
respect to which the casino has obtained and maintains on file the person's			a loan account or depaosit or other asset account,			1	
name and address, as well as Taxpayer Identification Number (TIN) (e.g. soci	ai		or a person with respect to which the financial				
security or employer identification number) or, if none, alien identification			instution has obtained and maintains on file the				
number or passport number and country of issuance and to which the casino			person's name and address, as well as taxpayer				
provides financial services relying on that information.			identification number (e.g., social security or				
			employer identification number) or, if none, alien			1	
			idenfication number or passport number and			1	
			country of issuance, and to which the financial			1	
			institution provides financial services relying on			1	
			that information.				
						1	
FinCEN – means the Financial Crimes Enforcement Network, a bureau of the			1010.100(s) FinCEN. FinCEN means the Financial				
Department of the Treasury.			Crimes Enforcement Network, a bureau of the			1	
			Department of the Treasury.				
Gaming Day – the normal business day of a casino. For a casino that offers		1021.100(d) Gaming day means the normal business day of a casino. For					
		a casino that offers 24 hour gaming, the term means that 24 hour period				1	
						1	İ
twenty-four (24) hour gaming, that twenty-four (24) hour period by which the							
twenty-four (24) hour gaming, that twenty-four (24) hour period by which the casino keeps its books and records for business, accounting, and tax purpose	es.	period by which the casino keeps its books and records for business,					
twenty-four (24) hour gaming, that twenty-four (24) hour period by which the	es.						

		542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
	Section 18 - Financial Transactions		1021	1010				Revision
	"Knowledge of Cash Transaction or Suspicious Activity" – In the case of a		1021.313 In the case of a casino, multiple currency transactions shall be					"Knowledge of Cash Transaction or Suspicious
	casino, multiple currency transactions shall be treated as a single transaction if		treated as a single transaction if the casino has knowledge that they are					Activity" – In the case of a casino, multiple currency
	the casino has knowledge that they are by or on behalf of any person and		by or on behalf of any person and result in either cash in or cash out					transactions shall be treated as a single transaction if
	result in either cash in or cash out totaling more than \$10,000 during any		totaling more than \$10,000 during any gaming day. For purposes of this					the casino has knowledge that they are by or on-
	gaming day. For purposes of this section, a casino shall be deemed to have		section, a casino shall be deemed to have the knowledge described in the					behalf of any person and result in either cash in or-
	the knowledge described in the preceding sentence, if: Any sole proprietor,		preceding sentence, if: Any sole proprietor, partner, officer, director, or					cash out totaling more than \$10,000 during any
	partner, officer, director, or employee of the casino, acting within the scope of		employee of the casino, acting within the scope of his or her					gaming day. For purposes of this section, a casino-
	his or her employment, has knowledge that such multiple currency		employment, has knowledge that such multiple currency transactions					shall be deemed to have the knowledge described in
	transactions have occurred, including knowledge from examining the books,		have occurred, including knowledge from examining the books, records,					the preceding sentence, if: Any sole proprietor,
	records, logs, information retained on magnetic disk, tape or other machine-		logs, information retained on magnetic disk, tape or other machine-					partner, officer, director, or employee of the casino,
	readable media, or in any manual system, and similar documents and		readable media, or in any manual system, and similar documents and					acting within the scope of his or her employment,
	information, which the casino maintains pursuant to any law or regulation or		information, which the casino maintains pursuant to any law or regulation					has knowledge that such multiple currency
	within the ordinary course of its business, and which contain information that		or within the ordinary course of its business, and which contain					transactions have occurred, including knowledge
	·							9
	such multiple currency transactions have occurred.		information that such multiple currency transactions have occurred.					from examining the books, records, logs, information
								retained on magnetic disk, tape or other machine-
								readable media, or in any manual system, and similar
								documents and information, which the casino
								maintains pursuant to any law or regulation or within
								the ordinary course of its business, and which-
								contain information that such multiple currency
								transactions have occurred.
	Machine-Readable – means capable of being read by an automated data		1021.100(e) Machine-readable means capable of being read by an					
	processing system.		automated data processing system.					
	Monetary instruments. Monetary instruments include:		automated data processing system.	1010.100(dd)(1) Monetary Instruments. Monetary				Monetary instruments. Monetary instruments-
	monetary monetary monetary monetary			instruments include:				include:
				instruments include.				medde.
A	Currency;			1010.100(dd)(1)(i) Currency;			A	Currency;
A B	Currency; Traveler's checks in any form;			1010.100(dd)(1)(i) Currency; 1010.100(dd)(1)(ii) Traveler's checks in any form;			A B	Currency; Traveler's checks in any form;
A B	Traveler's checks in any form;			1010.100(dd)(1)(ii) Traveler's checks in any form;			A B	Traveler's checks in any form;
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments	FinCEN CTR E-Filing Instructions v1.3(C)(7)		A B	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments (including personal checks, business checks,	Negotiable Instruments - All checks and drafts		A B	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts negotiable instruments (including personal checks,
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments	- I		A B	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments (including personal checks, business checks,	Negotiable Instruments - All checks and drafts		A B	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts negotiable instruments (including personal checks,
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that term is defined in the Uniform Commercial Code), and money orders) that are			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party	Negotiable Instruments - All checks and drafts (including business, personal, bank, cashier's and		₽.	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts negotiable instruments (including personal checks, business checks, official bank checks, cashier's
A B	Traveler's checks in any form;  All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that term is defined in the Uniform Commercial Code), and money orders) that are either in bearer form, endorsed without restriction, made out to a fictitious			1010.100(dd)(1)(ii) Traveler's checks in any form; 1010.100(dd)(iii) All negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that term is defined	Negotiable Instruments - All checks and drafts (including business, personal, bank, cashier's and third-party), money orders, and promissory notes.		A 8	Traveler's checks in any form;  Negotiable Instruments - All checks and drafts negotiable instruments (including personal checks, business checks, official bank checks, cashier's checks, third-party checks, promissory notes (as that
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REF	542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions	J-2	1021	1010	cer outdurite	Other negs	REF	Revision
Structuring – For purpose of Title 31 reporting, a person structures a			1010.100(xx) Structure (structuring). For purposes				No. 151611
transaction if that person, acting alone, or in conjunction with, or on behalf of,			of 1010.314, a person structures a transaction if				
other persons, conducts or attempts to conduct one or more transactions in			that person acting alone, or in conjunction with, or				
currency, in any amount, at one (1) or more locations where currency			on behalf of, other persons, conducts or attempts				
transactions are conducted, on one (1) or more days, in any manner, for the			to conduct one or more transactions in currency,				
purpose of evading the reporting requirements under Title 31. "In any			in any amount, at one or more financial				
manner" includes, but is not limited to, the breaking down of a single sum of			institutions, on one or more days, in any manner,				
currency exceeding Ten Thousand Dollars (\$10,000.00) into smaller sums,			for the purpose of evading the reporting				
including sums at or below Ten Thousand Dollars (\$10,000.00), including any			requirements under 1010.311, 1010.313, 1020.315,				
series of transactions. The transaction or transactions need not exceed the Ten			1021.311 and 1021.313 of this chapter. "In any				
Thousand Dollars (\$10,000.00) reporting threshold at any single casino			manner" includes, but is not limited to, the				
location on any single day in order to constitute structuring.			breaking down of a single sum of currency				
location on any single day in order to constitute structuring.			exceeding \$10,000.00 into smaller sums, including				
			3				
			sums at or below \$10,000.00, or the conduct of a				
			transaction, or series of currency transactions at or				
			below \$10,000. The transaction or transactions				
			need not exceed the \$10,000.00 reporting				
			threshold at any single financial institution on any				
			single day in order to constitute structuring within				
			the meaning of this definition.				
			1010100111170	EL CELL CED E EU		-	
<b>Transaction in Currency</b> – a transaction involving the physical transfer of			1010.100(bbb)(2) For purposes of 1010.311,	FinCEN CTR E-Filing Instructions v1.3(C)(7)		1	Transaction in Currency /Currency Transaction –
currency from one (1) person to another. A transaction which is a transfer of			1010.313, 1020.315, 1021.311, 1021.313, and	Transaction in Currency - The physical transfer of			a transaction involving the physical transfer of
funds by means of bank check, bank draft, wire transfer, or other written order,			other provisions of this chapter relating solely to	currency from one person to another. This does			currency from one (1) person to another. A
and which does not include the physical transfer of currency, is not a			the report required by those sections, the term	not include a transfer of funds by means of bank			transaction which is a transfer of funds by means of
transaction in currency for this purpose.			"transaction in currency" shall mean a transaction	check, bank draft, wire transfer or other written			bank check, bank draft, wire transfer, or other written
			involving the physical transfer of currency from	order that does not involve the physical transfer of			order, and which does not include the physical
			one person to another. A transaction which is a	currency.			transfer of currency, is not a transaction in currency
			transfer of funds by means of bank check, bank				for this purpose.
			draft, wire transfer, or other written order, and				
			which does not include the physical transfer of				
			currency, is not a transaction in currency for this				
			purpose.				
			purpose.				
18.2 General.							
In accordance with Title 26 – Internal Revenue Code, the gaming operation							
shall establish and comply with procedures for the correct reporting and							
A withholding of certain gaming winnings and/or promotional prizes and							
awards. These procedures shall be approved by the Cherokee Nation Gaming							
Commission (CNGC).							
Pursuant to the Title 31/Bank Secrecy Act, the gaming operation shall develop		1021.210(b)(1) Requirements for casinos. A casino shall be deemed to					Pursuant to the Title 31/Bank Secrecy Act, the
and implement a Compliance Program and system of internal controls, which		satisfy the requirements of 31 U.S.C. 5318(h)(1) if it implements and					<del>gaming operation</del> each casino shall develop and
includes detailed procedures used to comply with these standards. The		maintains a compliance program described in paragraph (b) of this					implement a written Compliance Program and
Compliance Program shall be approved by the CNGC. The gaming operation		section. 1021.210(a)					system of internal controls designed to assure and
shall ensure that the system of internal controls and Compliance Program		Compliance programs. Each casino shall develop and implement a written					monitor compliance, which includes detailed
remain current in respect to any changes to Title 31 or other events could		program reasonably designed to assure and monitor compliance with the					procedures used to comply with these standards.
B impact the validity and effectiveness of the system of internal controls or the		requirements set forth in 31 U.S.C. chapter 53, subchapter II and the				В	The Compliance Program shall be approved by the
Compliance program.		regulations contained in this chapter.					CNGC. The gaming operation casino shall ensure
							that the system of internal controls and Compliance
							Program remain current in respect to any changes to
							Title 31 or other events could impact the validity and
							effectiveness of the system of internal controls or
							the Compliance program.
According to Federal Law, the Title 31/Bank Secrecy Act requires the reporting		1021 200. Cacinos and card clubs are subject to the pregram				1	
, , , , ,		1021.200 Casinos and card clubs are subject to the program					
of certain financial transactions and the reporting of suspicious transactions.		requirements set forth and cross referenced in this subpart. Casinos and				1	
Additionally, certain records are required to be prepared and maintained		card clubs should also refer to Subpart B of Part 1010 of this Chapter for				1	
relative to Title 31/ Bank Secrecy Act for casinos having gross annual gaming		program requirements contained in that subpart which apply to casinos					
revenues in excess of One Million Dollars (\$1,000,000.00).		and card clubs.					
The purpose of these internal controls is to provide the casino with a						1	
D framework for developing a system of internal controls/procedures to meet							
the requirements of Title 26 and Title 31 of the U.S.C.							
For any Tribal authorized computer applications, alternate documentation							
and/or procedures which provide at least the level of control described by							
these standards will be acceptable, as approved by the CNGC.							
F Within this document the Title 31/Bank Secrecy Act will be referred to as Title							
31.						1	
For purpose of satisfying certain standards in this section, a military dependent							
identification card shall not be copied but may be used to establish a person's							
G identity; however, another form of primary identification must be obtained						1	
Land conied in order to complete the transaction		1	1	1		1	İ
and copied in order to complete the transaction.							

REF		542	Title 31, Chapter X		FinCEN Guidance	Other Regs REF	Recommended
	Section 18 - Financial Transactions		1021	1010			Revision
			1021.330(c) Reporting of currency received in a non-gaming business .  Non-gaming businesses (such as shops, restaurants, entertainment, and				IRS/FinCEN Form 8300 – Any casino that is below One Million Dollars (\$1,000,000.00) in gross annual
			hotels) at casino hotels and resorts are separate trades or businesses in				gaming revenues and non- gaming related
			which the receipt of currency in excess of \$10,000 is reportable under				businesses at a casino with over One Million Dollars
			section 5331 and these regulations. Thus, a casino exempt under			Н	(\$1,000,000.00) in gross annual revenue are required
			paragraph (a) or (b) of this section must report with respect to currency in excess of \$10,000 received in its non-gaming businesses.				to file a Form 8300 for any one transaction or aggregated cash transactions that are over Ten
			excess of \$10,000 received in its non-gaining businesses.				Thousand Dollars (\$10,000.00).
18.3	Procedures for Reporting Winnings.						
	Prior to payment of winnings, employees shall determine if winnings are						
Α	subject to Internal Revenue Service (IRS) reporting requirements. No winnings						
	shall be paid until the appropriate forms (as applicable) have been completed.						
	IRS Forms –W-2G, 5754, 1099, and 1042-S or other forms designated by the						
В	IRS for reporting winnings and/or promotional prizes and awards within this section shall be referenced as IRS forms for reporting winnings.						
	section shall be referenced as the forms for reporting withings.						
С	IRS Forms for reporting winnings shall be available to all departments that						
	may encounter reportable transactions.  IRS Forms for reporting winnings shall be completed in accordance with, and		+				+
D	contain the information required in Title 26 and this document for all						
-	reportable winnings and/or promotional prizes and awards.						
	Before concluding (i.e., prior to payment of winnings) any transaction subject						
E	to IRS reporting requirements, the handler of the transaction shall:						
	Obtain and examine two (2) forms of appropriate identification and obtain a						
	copy of the primary form of identification which shall be an official photo						
	identification (U.S. Government and military identification cannot be copied						
	and can only be used as secondary identification);						
	If tax identification (Social Security Card) is not available the winner must						
	complete form W-9 Request for Taxpayer Identification Number and Certification; PROVIDED the payee has not modified the form (other than						
	pursuant to instructions to the form) or if the payee has deleted the jurat or						
	other similar provisions by which the payee certifies or affirms the correctness						
	of the statements contained on the form.						
	Acceptable forms of primary identification include a driver's license, passport,						
	alien registration card, state issued identification card, federally recognized tribal photo identification, cedular card (foreign), or other photo identification						
,	and/or combination of unexpired documents that contain an individual's name						
	and address and are normally accepted by financial institutions as a means of						
	identification when cashing checks for persons other than established customers.						
	A Cherokee Nation citizenship card (commonly referred to as a "Blue Card") or						
a	Certificate Degree of Indian Blood (commonly referred to as either a "CDIB" or "White Card") for Cherokee citizens is not required to contain a photograph,						
	provided it meets all standards prescribed by the IRS;						
	All other tribal member cards issued by a federally recognized tribe MUST						
D	contain a photograph in order to meet this standard.						
	As an option to requesting the necessary identification and other data from an established customer, information on file may be used if:						
	•						
а	The customer's name and appropriate identification credentials were obtained						
b	from the customer for a previous transaction; The information is on file to properly complete the IRS Form; and,						
С	The customer information on file is periodically updated as follows:						
i	Copy of original (primary) identification credential (two forms of identification						
	must be verified when the customer file is setup);  If the customer's Social Security Card was not available, the customer must						
	have a completed form W-9 Request for Taxpayer Identification Number and						
$\vdash$	Certification on file;  Documentation of the examinations is included in the information on file;						
iii							
iv	Expiration dates of identification credentials are included in the information on						
v	file; and, The transaction date is prior to the expiration date on file.						+
	The appropriate IRS Form for reporting winnings shall be completed according						
5	to the Form instructions and forwarded to the accounting department for review and transmittal to the IRS.						
18.4	review and transmittal to the IRS.  Title 31 Compliance Program.		Subpart B - Programs				

REF	542 Title 31, Chapter X	FinCEN Guidance	Other Regs REI	F Recommended
Section 18 - Financial Transactions	1021	1010	Other negs RE	Revision
In accordance with Part 18.2 (B) of this Section, each Compliance Program	1021.210(b)(1) Compliance program s. Each casino shall develop and	FIN-2010-G003(I) A casino or card club is required	d	
shall, at a minimum, provide for:	implement a written program reasonably designed to assure and monitor	to develop and implement a BSA compliance		
	compliance with the requirements set forth in 31 U.S.C. chapter 53,	program that adequately addresses the risks		
	subchapter II and the regulations contained in this chapter.	posed by its products, services, customer base,		
		and geographical location for the potential of		
A	1021.210(b)(2) At a minimum, each compliance program shall provide	money laundering and terrorist financing. At a		
	for:	minimum, each BSA compliance program must		
		provide for:		
A system of internal controls to assure ongoing compliance;	1021.210(b)(2)(i) A system of internal controls to assure ongoing	FIN-2010-G003(I) A system of internal controls to		
1	compliance;	assure ongoing compliance with the BSA;		
Internal and/or external independent testing for compliance. The scope and	1021.210(b)(2)(ii) Internal and/or external independent testing for			
frequency of the testing shall be commensurate with the money laundering	compliance. The scope and frequency of the testing shall be	independent testing for compliance with a scope		
and terrorist financing risks posed by the products and services provided by	commensurate with the money laundering and terrorist financing risks			
the casino;	posed by the products and services provided by the casino;	money laundering and terrorist financing posed by	y	
		the products and services provided;		
Training of casino personnel, including training in the identification of unusual	1021.210(b)(2)(iii) Training of casino personnel, including training in the	FIN-2010-G003(I) Training of casino personnel,		
or suspicious transactions, to the extent that the reporting of such transactions	identification of unusual or suspicious transactions, to the extent that the			
is required by Title 31, by other applicable law or regulation, or by the casinos	reporting of such transactions is required by this chapter, by other	2 2		
own administrative and compliance policies;	applicable law or regulation, or by the casino's own administrative and			
	compliance policies:			
Designated individual and/or department to assure day-to- day compliance;	1021.210(b)(iv) An individual or individuals to assure day-to-day	FIN-2010-G003(I) An individual or individuals to		
4 and,	compliance;	assure day-to-day compliance with the BSA;		
Procedures for using all available information to determine:	1021.210(b)(2)(c) Procedures for using all quallable information to	EIN 2010 C002/D Procedures for min = = II		
Procedures for using all available information to determine:	1021.210(b)(2)(v) Procedures for using all available information to determine:	FIN-2010-G003(I) Procedures for using all available information to determine and verify,		
5	determine.	when required, the name, address, social security		
		or taxpayer identification number, and other		
		identifying information for a person;		
When required to be reported, the name, address, social security number	1021.210(b)(2)(v)(A) When required by this chapter, the name, address,	FIN-2010-G003(I) Procedures for using all		
(SSN), and other information, and verification of the same, of a person;	social security number, and other information, and verification of the	available information to determine and verify,		
	same, of a person;	when required, the name, address, social security		
a		or taxpayer identification number, and other		
		identifying information for a person;		
The occurrence of any transactions or patterns of transactions required to be	1021.210(b)(2)(v)(B) The occurrence of any transactions or patterns of	FIN-2010-G003(I) Procedures for using all		
reported;	transactions required to be reported pursuant to 1021.320;	available information to determine the occurrence		
b		of any transactions or patterns of transactions		
		required to be reported as suspicious.		
Whether a record required by Title 31 must be made and retained; and,	1021.210(b)(2)(v)(C) Whether any record as described in subpart D of Part	FIN-2010-G003(I) Procedures for using all		Whether a record required by Title 31 must be made
	1010 if this Chapter or subpart D of Part 1021 must be made and			and retained <del>; and,.</del>
C	retained; and,	record required under the BSA must be made and		
		retained; and		
For casinos that have automated data processing systems, the use of	1021.210(b)(2)(vi) For casinos that have automated data processing		d 6	' -
d automated programs to aid in assuring compliance.	systems, the use of automated programs to aid in assuring compliance.	automated data processing systems, use of the		systems, the use of automated programs to aid in
		programs to aid in assuring compliance.		assuring compliance.
Currenty Transaction Depart (CTD) Decardure	Submont C. Done to Done in J. D. Made D. Coding and C. J. C.			
18.5 Currency Transaction Report (CTR) Procedures.	Subpart C - Reports Required To Be Made By Casinos and Card Clubs			
Each casino shall file a report of each transaction or aggregate transactions in	1021.311 Each casino shall file a report of each transaction in currency,			Each casino shall file a report of each transaction or
currency, involving either cash in or cash out, of more than Ten Thousand	involving either cash in or cash out, of more than \$10,000.00.			aggregate transactions in currency, involving either
Dollars (\$10,000.00) in the casino's twenty-four (24) hour gaming day.				cash in or cash out, of more than Ten Thousand
(+)	1021.313 In the case of a casino, multiple currency transactions shall be			Dollars (\$10,000.00) in the casino's twenty-four
	treated as a single transaction if the casino has knowledge that they are			(24) hour gaming day. Multiple currency transactions
	by or on behalf of any person and result in either cash in or cash out			shall be treated as a single transaction if the casino
	totaling more than \$10,000 during any gaming day.			has knowledge that they are by or on behalf of any
				person and result in either cash in or cash out
				totaling more than \$10,000 during any gaming day.
Transactions in currency involving cash in include, but are not limited to:	1021.311(a) Transactions in currency involving cash in include, but are		+	+
A Transactions in currency involving cash in include, but are not inflited to:	not limited to:			
Purchases of chips, tokens, and other gaming instruments;	1021.311(a)(1) Purchases of chips, tokens, and other gaming instruments;			
1	Services of Super-			
2 Front money deposits;	1021.311(a)(2) Front money deposits;			
3 Safekeeping deposits;	1021.311(a)(3) Safekeeping deposits;			
Payments on any form of credit, including markers and counter checks;	1021.311(a)(4) Payments on any form of credit, including markers and			
	counter checks;			
5 Bets of currency, including money plays;	1021.311(a)(5) Bets of currency, including money plays;			
6 Currency received by a casino for transmittal of funds through wire transfer for	1021.311(a)(6) Currency received by a casino for transmittal of funds			
a customer;	through wire transfer for a customer;	L	1	

REF		542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
	Section 18 - Financial Transactions		1021	1010				Revision
7	Purchases of a casino's check;		1021.311(a)(7) Purchases of a casino's check;					
8	Exchanges of currency for currency; and,		1021.311(a)(8) Exchanges of currency for currency, including foreign	ו			8	Exchanges of currency for currency, including foreign
_			currency; and,					currency; and,
9	Bills inserted into electronic gaming devices.		1021.311(a)(9) Bills inserted into electronic gaming devices.					
В	Transactions in currency involving cash out include, but are not limited to:		1021.311(b) Transactions in currency involving cash out include, but an					
	Redemations of chine takens tickets and other gaming instruments:		not limited to:					
1	Redemptions of chips, tokens, tickets, and other gaming instruments;		1021.311(b)(1) Redemptions of chips, tokens, tickets, and other gaming instruments:	3				
2	Front money withdrawals:		1021.311(b)(2) Front money withdrawals;					
	Safekeeping withdrawals;		1021.311(b)(3) Safekeeping withdrawals;					
	Advances on any form of credit, including markers and counter checks;		1021.311(b)(4) Advances on any form of credit, including markers and	1				
4	· · · · · · · · · · · · · · · · · · ·		counter checks;					
5	Payments on bets;		1021.311(b)(5) Payments on bets;					
c	Payments by a casino to a customer based on receipt of funds through wire		1021.311(b)(6) Payments by a casino to a customer based on receipt o	f				
b	transfers;		funds through wire transfers;					
7	Cashing of checks or other negotiable instruments;		1021.311(b)(7) Cashing of checks or other negotiable instruments;					
8	Exchanges of currency for currency;		1021.311(b)(8) Exchanges of currency for currency, including foreign	n			8	Exchanges of currency for currency, including foreign
			currency;				Ů	currency;
9	Travel and complimentary expenses and gaming incentives; and,		1021.311(b)(9) Travel and complimentary expenses and gaming					
			incentives; and,					
10	Payment for tournament, contests, and other promotions.		1021.311(b)(10) Payment for tournament, contests, and other	r				
			promotions.					
	Casinos are exempted from reporting the following currency transactions:		1021.311(c) Other provisions of this chapter notwithstanding, casinos and		FinCEN CTR E-Filing Instructions v1.3(C)(2) Casino			
С			exempted from the reporting obigations found in this section and		filing exceptions. A casino does not have to			
			1021.313 for the following transactions in currency or currency	<u> </u>	report transactions with:			
	Transactions with domestic banks;		transactions: 1021.315 Refer to 1010.315 of this Chapter for exemptions from the	1010.315 A non-bank financial institution is not	FinCEN CTR E Filing Instructions v1 2/CV2V			
	Transactions with domestic banks,		obligation to file reports of transactions in currency for casinos.		FinCEN CTR E-Filing Instructions v1.3(C)(2)			
1			lobiligation to the reports of transactions in currency for casinos.	required to file a report otherwise required by §1010.311 with respect to a transaction in	domestic banks; or			
-				· · · · · · · · · · · · · · · · · · ·				
				currency between the institution and a commercial				
	Transactions between a casino and a currency dealer or exchanger, or between		1021.311(c)(1) Transactions between a casino and a dealer in foreign	Dalik.	FinCEN CTR E-Filing Instructions v1.3(C)(2)			
	a casino and a check casher, so long as such transactions are conducted		exchange, or between a casino and a check cashier, as those terms are		Currency dealers or exchangers, or check cashers,			
	pursuant to a contractual or other arrangement with a casino covering the		defined in §1010.100(ff) of this chapter, so long as such transactions are		as defined in 31 CFR 1010.100(ff), and which are			
2	financial services in Part 18.5 (A)(8), Part 18.5 (B)(7), and (B)(8) of this Section;		conducted pursuant to a contractual or other arrangement with a casino		conducted pursuant to contractual or other			
	minancial services in rare 2015 (19(6)) rare 2015 (19)(7)) and (19)(6) or any section,		covering the financial services in paragraphs (a)(8), (b)(7), and (b)(8) o		agreement covering the financial services in 31			
			this section;		CFR 1021.311(a)(8), 1021.311(b)(7), and			
			uno section,		1021 311(b)(8)			
	Cash out transactions to the extent the currency is won in a money play and is		1021.311(c)(2) Cash out transactions to the extent the currency is won in	1	FinCEN CTR E-Filing Instructions v1.3(C)(2) Cash			
	the same currency the customer wagered in the money play, or cash in		a money play and is the same currency the customer wagered in the	e	ins when they are the same physical currency			
	transactions to the extent the currency is the same currency the customer		money play, or cash in transactions to the extent the currency is the same		previously wagered in a money play on the same			
	previously wagered in a money play on the same table game without leaving		currency the customer previously wagered in a money play on the same	e	table game without leaving the table; or Cash outs			
	the table;		table game without leaving the table;		won in a money play when they are the same			
3					physical currency wagered, (However, when a			
					customer increases a subsequent cash bet (i.e.			
					money play), at the same table game without			
					departing, the increase in the amount of the			
					currency bet would represent a new bet of			
					currency and a transaction in currency);			
	Rills inserted into electronic gaming devices in multiple transactions (v-land		1021.311(c)(3) Bills inserted into electronic gaming devices in multiple		FinCEN CTD E Filing Instructions v1.2(C)(2) Pills			Rills inserted into electronic coming devices in
	Bills inserted into electronic gaming devices in multiple transactions (unless a casino has knowledge pursuant to the definition of 'knowledge of a cash				FinCEN CTR E-Filing Instructions v1.3(C)(2) Bills			Bills inserted into electronic gaming devices in
	transaction or suspicious activity' contained in Section 19.1, in which case this		transactions (unless a casino has knowledge pursuant to 1021.313, in		inserted into electronic gaming devices in multiple			multiple transactions (unless a casino has knowledge pursuant to the definition of 'knowledge of a cash
4	· · · · · · · · · · · · · · · · · · ·		which case this exemption does not apply); and,		transactions (unless a casino has knowledge		4	l.
	exemption does not apply); and,				pursuant to 31 CFR 1021.313);			transaction or suspicious activity' contained in
								Section 18 19.1, in which case this exemption does
	Jackpots from electronic gaming devices. IRS/FinCEN Form 8300 – Any casino		1021.311(c)(4) Jackpots from slot machines or video lottery terminals.		FinCEN CTR E-Filing Instructions v1.3(C)(2)			Jackpots from electronic gaming devices.
	that is below One Million Dollars (\$1,000,000.00) in gross annual gaming		Committee of Naco locally committee.		Jackpots from slot machines or video lottery			IRS/FinCEN Form 8300 – Any casino that is below
	revenues and non- gaming related businesses at a casino with over One				terminals.			One Million Dollars (\$1,000,000.00) in gross annual
	Million Dollars (\$1,000,000.00) in gross annual revenue are required to file a							gaming revenues and non- gaming related
_	Form 8300 for any one transaction or aggregated cash transactions that are						_	businesses at a casino with over One Million Dollars
5	over Ten Thousand Dollars (\$10,000.00).						5	(\$1,000,000.00) in gross annual revenue are required
	Over 1611 Modsand Donais (#10,000.00).							to file a Form 8300 for any one transaction or
								aggregated cash transactions that are over Ten
			1	1	1			raggreg <del>ated cash transactions that are over 1811</del>
								Thousand Dollars (\$10,000.00).

REF		542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
	Section 18 - Financial Transactions		1021	1010				Revision
	Before concluding any transaction with respect to which a CTR report is		1021.312 Refer to §1010.312 of this chapter for identification	1010.312 Before concluding any transaction with	- I			
	required (i.e., before completing the currency exchange) under this Section,		requirements for reports of transaction in currency filed by casinos and	respect to which a report is required under	Identification requirements. Acceptable forms			
	the handler of the transaction shall:		card clubs.	1010.311, 1010.313, 1020.315, 1021.311 or	of identification include driver's license, military or			
				1021.313 of this chapter, a financial institution	military/dependent identifcation card, passport,			
				shall	state issued identification card, foreign cedula			
					card, non-resident alien identification card, or any			
					other identification document which contains			
					name and preferably address and a photograph			
D					and is normally acceptable by financial institutions			
					as a means of identification when cashing checks			
					for persons other than established customers.			
								Add acceptable forms of identification. Consistent
								with IRS standards (omit military).
	Marife, and accordate accordant address of the individual according			1010 212	FigCFN CTD F Filing Instructions of 2(C)(F)			with INS standards (Offic Hillitary).
	Verify and record the name and address of the individual presenting a			1010.312verify and record the name and	FinCEN CTR E-Filing Instructions v1.3(C)(5)			
	transaction, as well as record the identity, account number, and the social			address of the individual presenting a transaction,	Acceptable identification information obtained			
	security or taxpayer identification number, if any, of any person or entity on			as well as record the identity, account number,	previously and maintained in the financial			
	whose behalf such transaction is to be effected.			and the social security or taxpayer identification	institution's records may be used. For example, if			
				number, if any, of any person or entity on whose	documents verifying an individual's identity were			
				behalf such transaction is to be effected.	examined and recorded on a signature card when			
					an account was opened, the financial institution			
1					may rely on that information. In completing the			
					FinCEN CTR, the financial institution must indicate			
					on the report the method, type, and number of			
					the identification. Statements such as "known			
					customer" or "signature card on file" are			
					prohibited and are not sufficient for report			
					completion. The actual identifying information			
					must be provided.			
	Marketta afala da arti afala da arti afala da da da da da da da da da da da da da			1010 212 - 1/2 (Cardian of the Chard) (Cardian of the Chard)	FIGGIN CTD F FILL Last at the 1 2/CVF). For			
	Verification of the identity of an individual who indicates that he or she is an			1010.312Verification of the identity of an	FinCEN CTR E-Filing Instructions v1.3(C)(5) For			
	alien or is not a resident of the United States must be made by passport, alien			individual who indicates that he or she is an alien	casino customer's granted accounts for credit,			
	identification card, or other official document evidencing nationality or			or is not a resident of the United States must be	deposit, or check cashing, or on whom a previous			
	residence (e.g., a Provincial driver's license with indication of home address).			made by passport, alien identification card, or	CTRC or FinCEN CTR containing verified identity			
				other official document evidencing nationality or	has been filed, acceptable identification			
				residence (e.g., a Provincial driver's license with	information obtained previously and maintained in			
2				indication of home address).	the casino's internal records may be used as long			
					as the following conditions are met. The			
					customer's identity is re-verified periodically, any			
					out-of-date identifying information is updated in			
					the internal records, and the date of each re-			
					verification is noted on the internal record.			
								Add
	Verification of identity in any other case shall be made by examination of a		<u> </u>	1010.312Verification of identity in any other				
	document, other than a bank signature card, that is normally acceptable within			case shall be made by examination of a document,				
	the banking community as a means of identification when cashing checks for			other than a bank signature card, that is normally				
3	nondepositors (e.g., a driver's license or credit card).			acceptable within the banking community as a				
				means of identification when cashing checks for				
				nondepositors (e.g., driver's license or credit card).				
	A bank signature card may be relied upon only if it was issued after			1010.312A bank signature card may be relied				
	documents establishing the identity of the individual were examined and			upon only if it was issued after documents				
	notation of the specific information was made on the signature card.			establishing the identity of the individual were				
4	motation of the specific information was made on the signature card.			examined and notation of the specific information				
				was made on the signature card.				
	In each instance, the specific identifying information (i.e., the account number			1010.312In each instance, the specific				In each instance, the specific identifying information
	of the credit card, the driver's license number, etc.) used in verifying the			identifying information (i.e., the account number				(i.e., the account number of the credit card, the
	identity of the customer shall be recorded on the report, and the mere			of the credit card, the driver's license number, etc.)				driver's license number, etc.) used in verifying the
	notation of "known customer" or "bank signature card on file" on the report is			used in verifying the identity of the customer shall			<b>€</b> 5	identity of the customer shall be recorded on the
E			1	be recorded on the report, and the mere notation	i		1	report, and the mere notation of "known customer"
E	prohibited.				I I			
E	profilibited.			of "known customer" or "bank signature card on file" on the report is prohibited.				or "bank signature card on file" on the report is prohibited.

REF	542 Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions	1021	1010				Revision
All CTRs must be filed electronically through the BSA E- filing system.				77 Fed. Reg. 12367(2012) Notice on E-Filing		
				Mandate. On February 23, 2012, the Financial		
				Crimes Enforcement Network (FinCEN) issues a		
				Final Notice requiring the electronic filing of most		
F				Bank Secrecy Act (BSA) reports by July 1, 2012.		
				Specifically, this action mandates the electronic		
				submission of Suspicious Activity Reports (SARs),		
				Currency Transaction Reports (CTRs), etc.		
A currency transaction report for each transaction or series of transactions, in	1021.311 Each casino shall file a report of each transaction in curre	ncy				A currency transaction report for each transaction or
currency, involving either cash in or cash out, of more than Ten Thousand	involving either cash in or cash out, of more than \$10,000.00.	1-97				series of transactions, in currency, involving either
Dollars (\$10,000.00) in a gaming day must be filed with the IRS in accordance						cash in or cash out, of more than Ten Thousand
with current IRS filing deadlines. Casinos may report both cash in and cash out	1021.313 In the case of a casino, multiple currency transactions shall	be				Dollars (\$10,000.00) in a gaming day must be filed
transactions by or on behalf of the same customer on a single currency	treated as a single transaction if the casino has knowledge that they				G	with the IRS in accordance with current IRS filing-
transaction report.	by or on behalf of any person and result in either cash in or cash				G	deadlines. Casinos may report both cash in and cash
	totaling more than \$10,000 during any gaming day.					out transactions by or on behalf of the same
						customer on a single currency transaction report.
18.6 Structured Transactions						
18.6 Structured Transactions.  No person shall for the purpose of evading the transactions in currency	1021.314 Refer to 1010.314 of this Chapter for rules regarding structu	red 1010 314. No person shall for the purpose of				
reporting requirements of Title 21 with respect to such transactions	transactions for casinos.	evading the transactions in currency reporting				
A reporting requirements of fitte 51, with respect to such transaction.	adibactions for capitios.	requirements of this chapter with respect to such				
		transaction:				
Cause or attempt to cause the gaming operation to fail to file a report		1010.314(a) Cause or attempt to cause a				
required under these standards;		domestic financial institution to fail to file a report				
1		required under the transactions in currency	,			
		reporting requirements of this chapter;				
		· · ·				
Cause or attempt to cause a gaming operation to file a report required under		1010.314(b) Cause or attempt to cause a				
these standards that contains a material omission or misstatement of fact; or,		domestic financial institution to file a report				
2		required under the tranactions in currency				
		reporting requirements of this chapter that				
		contains a material omission or misstatement of				
Structure, attempt to structure, assist in structuring, or attempt to assist in		1010.314(c) Structure, (as that term is defined in				
structuring any transaction which is required to be reported under these		1010.100(xx)) or assist in structuring, or attempt to				
3 standards.		structure or assist in structuring, any transaction				
		with one or more domestic financial institutions.				
18.7 Negotiable Instruments Log (NIL) Procedures.						
The casino shall maintain a separate record containing list(s) of each	1021.410(b)(9)(i) In addition, each casino shall retain either the original					
transaction with its customers involving the following instruments and having	a copy or reproduction of each of the following: (9)(i) A separate rec					
A a face value of Three Thousand Dollars (\$3,000.00) or more:	containing a list of each transaction between the casino and its custon					
	involving the following types of instruments having a face value of \$3,	500				
Personal Checks;	1021.410(b)(9)(i)(A) Personal checks (excluding instruments which					Personal Checks (excluding instruments which
1	evidence credit granted by a casino strictly for gaming, such as marker	5);			1	evidence credit granted by a casino strictly for
	, , , , , , , , , , , , , , , , , , ,					gaming, such as markers);
2 Business Checks (including casino checks);	1021.410(b)(9)(i)(B) Business checks (including casino checks);					
3 Official Bank checks;	1021.410(b)(9)(i)(C) Official bank checks;					
4 Cashier's checks;	1021.410(b)(9)(i)(D) Cashier's checks;			<u> </u>	-	
5 Third-party checks;	1021.410(b)(9)(i)(E) Third-party checks;			<del> </del>	1	
6 Traveler's checks; and, 7 Money Orders.	1021.410(b)(9)(i)(G) Traveler's checks; and, 1021.410(b)(9)(i)(H) Money Orders.	+			<del>                                     </del>	+
7 Money Orders. The list referenced above in Section 18.7 (A) shall contain the following	1021.410(b)(9)(i)(H) Money Orders.  1021.410(b)(9)(ii) The list will contain the time, date, and amount of the				1	The list referenced above in Section 18.7 (A) shall
information for loggable transactions. Time date and amount of the	transaction;					contain the following information for loggable
transaction;	transaction,				B and B(	transactions: Time, date, and amount of the
adibaction,						transaction:
The name and permanent address of the customer;	1021.410(b)(9)(ii)the name and permanent address of the customer;				<del>9</del> 2	The name and permanent address of the customer;
The type of instrument;	1021.410(b)(9)(ii)the type of instrument,				<del>10</del> 3	The type of instrument;
The name of the drawee or issuer of the instrument;	1021.410(b)(9)(ii) the name of the drawee or issuer of the instrumer	t			<del>11</del> 4	The name of the drawee or issuer of the instrument;
	4004 440/1/45:377			<u> </u>	-	
All reference numbers (e.g., casino account number, personal check number,	1021.410(b)(9)(ii)all reference numbers (e.g., casino account numbe	,			<del>12</del> 5	All reference numbers (e.g., casino account number,
The name and employes identification and the control of the contro	personal check number, etc. );				-	personal check number, etc.);
The name and employee identification number of the employee who conducted the transaction(s);	1021.410(b)(9)(ii)and the name or casino license number of the casi	io			13.6	The name and employee identification number of
conducted the transaction(s),	employee who conducted the transaction.				<del>13</del> 0	the employee who conducted the transaction(s);
Loggable transactions will be placed on the list in chronological order in which	1021.410(b)(9)(ii)Applicable transactions will be placed on the list in	the				Loggable transactions will be placed on the list in
they occur.	chronological order in which they occur.				<del>14</del> 7	chronological order in which they occur.
18.8 Suspicious Activity Report (SAR) Procedures.	1021.320 Reports by casinos of suspicious transactions.					.,,
. , , , , , , , , , , , , , , , , , , ,			•	•		

REF		542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
IXLI	Section 18 - Financial Transactions	342	1021	1010	Tincer Guidance	Other Regs	KEF	Revision
	Every casino shall file with FinCEN, to the extent and in the manner required, a		1021.320(a)(1) General. Every casino shall file with FinCEN, to the extent	1010				Every casino shall file with FinCEN, to the extent and
	report of any suspicious transaction that is relevant or that the gaming		and in the manner required by this section, a report of any suspicious					,
	, , ,		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					in the manner required by this section, a report of
	operation believes to be relevant to a possible violation of law or regulation.		transaction relevant to a possible violation of law or regulation. A casino					any suspicious transaction that is relevant or that the
			may also file with FinCEN, by using the form specified in paragraph (b)(1)					gaming operation believes to be relevant to a
Α			of this section, or otherwise, a report of any suspicious transaction that it				Α	possible violation of law or regulation. A casino may
			believes is relevant to the possible violation of any law or regulation but					also file with FinCEN, a report of any suspicious
			whose reporting is not required by this section.					transaction that it believes is relevant to the possible
								violation of any law or regulation but whose
								reporting is not required by this section.
								reporting is not required by this section.
	A transaction requires reporting under the terms of this Section if it is		1021.320(a)(2) A transaction requires reporting under the terms of this					
	conducted or attempted by, at, or through a casino, and involves or		section if it is conducted or attempted by, at, or through a casino, and					
_	aggregates at least Five Thousand Dollars (\$5,000.00) in funds or other assets,		involves or aggregates at least \$5,000 in funds or other assets, and the					
В	and the casino knows, suspects, or has reason to suspect that the transaction		casino knows, suspects, or has reason to suspect that the transaction (or					
	· · · · · · · · · · · · · · · · · · ·							
	(or pattern of transactions of which the transaction is a part):		pattern of transactions of which the transaction is a part):					
	Involves funds derived from illegal activity or is intended or conducted in		1021.320(a)(2)(i) Involves funds derived from illegal activity or is intended					
	= -							
	order to hide or disguise funds or assets derived from illegal activity		or conducted in order to hide or disguise funds or assets derived from					
	(including, without limitation, the ownership, nature, source, location, or		illegal activity (including, without limitation, the ownership, nature, source,					
1	control of such funds or assets) as part of a plan to violate or evade any		location, or control of such funds or assets) as part of a plan to violate or					
	Federal law or regulation or to avoid any transaction reporting requirement		evade any Federal law or regulation or to avoid any transaction reporting					
	under Federal law or regulation;		requirement under Federal law or regulation;					
	-		,					
	Is designed, whether through structuring or other means, to evade any		1021.320(a)(2)(ii) Is designed, whether through structuring or other					
2	requirements of this Section or of any other regulations promulgated under		means, to evade any requirements of this chapter or of any other					
	the Title 31;		regulations promulgated under the Bank Secrecy Act;				<u> </u>	
	Has no business or apparent lawful purpose or is not the sort in which the		1021.320(a)(2)(iii) Has no business or apparent lawful purpose or is not					
	particular customer would normally be expected to engage, and the casino		the sort in which the particular customer would normally be expected to					
	knows of no reasonable explanation for the transaction after examining the		engage, and the casino knows of no reasonable explanation for the					
3	·		transaction after examining the available facts, including the background					
	available facts, including the background and possible purpose of the		1					
	transaction; or,		and possible purpose of the transaction; or,					
-	to all an area Color and area College and advantage of the		1001 200(-)(2)(1)					
4	Involves use of the casino to facilitate criminal activity.		1021.320(a)(2)(iv) Involves use of the casino to facilitate criminal activity.					
-			4004 2004 V4V 5''					
	A suspicious transaction shall be reported by completing a SAR and collecting		1021.320(b)(1) Filing procedures - What to file. A suspicious transaction					
С	and maintaining supporting documentation as required by this Section.		shall be reported by completing a Suspicious Activity Report ("SAR"), and					
			collecting and maintaining supporting documentation as required by					
			paragraph (d) of this section.					
	The SAR shall be filed with FinCEN as indicated in the instructions to the SAR.		1021.320(b)(2) Where to file. The SAR shall be filed with FinCEN in a			77 Fed. Reg. 12367(2012) Notice on E-Filing		
	All SARs must be filed electronically through the BSA E-filing system.		central location, to be determined by FinCEN, as indicated in the			Mandate. On February 23, 2012, the Financial		
			instructions to the SAR.			Crimes Enforcement Network (FinCEN) issues a		
						Final Notice requiring the electronic filing of most		
D						Bank Secrecy Act (BSA) reports by July 1, 2012.		
						Specifically, this action mandates the electronic		
						submission of Suspicious Activity Reports (SARs),		
						Currency Transaction Reports (CTRs), etc.		
	A SAR shall be filed no later than thirty (30) calendar days after the date of the		1021.320(b)(3) When to file. A SAR shall be filed no later than 30					
	· · · · · · · · · · · · · · · · · · ·		calendar days after the date of the initial detection by the casino of facts					
	initial detection by the casino of facts that may constitute a basis for filing a							
	SAR under this Section. If no suspect is identified on the date of such initial		that may constitute a basis for filing a SAR under this section. If no					
E	detection, a casino may delay filing a SAR for an additional thirty (30) calendar		suspect is identified on the date of such initial detection, a casino may					
	days to identify a suspect, but in no case shall reporting be delayed more than		delay filing a SAR for an additional 30 calendar days to identify a suspect,					
	sixty (60) calendar days after the date of such initial detection.		but in no case shall reporting be delayed more than 60 calendar days					
			after the date of such initial detection					
<u> </u>								
	In situations involving violations that require immediate attention, such as		1021.320(b)(3)In situations involving violations that require immediate					
	ongoing money laundering schemes, the casino or designated individual shall		attention, such as ongoing money laundering schemes, the casino shall					
F	immediately notify by telephone an appropriate law enforcement authority in		immediately notify by telephone an appropriate law enforcement					
	addition to filing a SAR within the specified time frames.		authority in addition to filing timely a SAR					
	· · ·							
	The casino or designated individual may also report suspicious transactions	<del></del>	1021.320(b)(3)Casinos wishing voluntarily to report suspicious					
_	that may relate to terrorist activity by contacting the Fin Cen's Hotline at 1-866		transactions that may relate to terrorist activity may call FinCEN's Financial					
G	556-3974 in addition to filing a SAR within the specified time frames.		Institutions Hotline at 1-866-556-3974 in addition to filing timely a SAR if					
	g = 2 a a a a a a a a a a a a a a a a a a		required by this section.					
	SARs are considered confidential documents and are not to be disclosed with		1021.320(e) Confidentiality of SARs. A SAR, and any information that				İ	A SARs, and any information that would reveal the
	any individual not authorized or privy to the information contained therein							existence of a SAR, are considered confidential
			would reveal the existence of a SAR, are confidential and shall not be					
	(e.g., law enforcement, CNGC, designated compliance personnel, etc.). No		disclosed except as authorized in this paragraph (e). For purposes of this					documents and are not to be disclosed with any
	casino, director, officer, employee, nor agent of any gaming operation who		paragraph (e) only, a SAR shall include any suspicious activity report filed					individual not authorized or privy to the information
	reports a suspicious transaction may notify any person involved in the		with FinCEN pursuant to any regulation in this chapter.					contained therein (e.g., law enforcement, CNGC,
	transaction that it has been reported.							designated compliance personnel, etc.). No casino,
Н			1021.320(e)(1) Prohibition on disclosures by casinos- (i) General rule. No				Н	and no director, officer, employee, nor agent of any
			casino, and no director, officer, employee, or agent of any casino, shall					gaming operation casino, shall disclose a SAR or any
			disclose a SAR or any information that would reveal the existence of a				1	information that would reveal the existence of a SAR.
			SAR					who reports a suspicious transaction may notify any
			Jan					
								person involved in the transaction that it has been
								<del>reported.</del>
	ı		<b>_</b>		ı	<b>_</b>		

REF	542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions		1021	1010				Revision
Any person subpoenaed or otherwise requested to disclose a SAR or		1021.320(e)(1)(i)Any casino, and any director, officer, employee, or					Any person subpoenaed or otherwise requested to
information contained in a SAR, except where disclosure is requested by		agent of any casino that is subpoenaed or otherwise requested to					disclose a SAR or information contained in that
FinCEN or another appropriate law enforcement or regulatory agency, shall		disclose a SAR or any information that would reveal the existence of a					would reveal the existence of a SAR, except where
decline to produce the SAR or to provide any information that would disclose		SAR, shall decline to produce the SAR or such information, citing this					disclosure is requested by FinCEN or another
that a SAR had been prepared or filed, as protected under Title 31.		section and 31 U.S.C. 5318(g)(2)(A)(i), and shall notify FinCEN of any such				1	appropriate law enforcement or regulatory agency,
1		request and the response thereto.				1	shall decline to produce the SAR or to provide any
		request und the response thereto.					information that would disclose that a SAR had been
							prepared or filed, as protected under Title 31.
							prepared of filed, as protected under fille 31.
Provided that no person involved in any reported suspicious transaction is		1021.320(e)(1)(ii) Rules of Construction. Provided that no person					
notified that the transaction has been reported, this Section shall not be		involved in any reported suspicious transaction is notified that the					
construed as prohibiting:		transaction has been reported, this paragraph (e)(1) shall not be					
,		construed as prohibiting:					
The disclosure by a casino, or any director, officer, employee, or agent of a		1021.320(e)(1)(ii)(A) The disclosure by a casino, or any director, officer,					
casino, of:		employee, or agent of a casino, of:					
A SAR, or any information that would reveal the existence of a SAR, to FinCEN		1021.320(e)(1)(ii)(A)(1) A SAR, or any information that would reveal the					
or any Federal, State, or local law enforcement agency, or any Federal		existence of a SAR, to FinCEN or any Federal, State, or local law					
regulatory authority that examines the casino for compliance with the Bank		enforcement agency, or any Federal regulatory authority that examines					
Secrecy Act, or any State regulatory authority administering a State law that		the casino for compliance with the Bank Secrecy Act, or any State					
requires the casino to comply with the Bank Secrecy Act or otherwise		regulatory authority administering a State law that requires the casino to					
authorizes the State authority to ensure that the casino complies with the		comply with the Bank Secrecy Act or otherwise authorizes the State					
Bank Secrecy Act, or the CNGC; or		authority to ensure that the casino complies with the Bank Secrecy Act, or					
		any tribal regulatory authority administering a tribal law that requires the					
a		casino to comply with the Bank Secrecy Act or otherwise authorizes the					
		tribal regulatory authority to ensure that casino complies with the Bank					
		Secrecy Act; or					
The underlying facts, transactions, and documents upon which a SAR is based,		1021.320(e)(1)(ii)(A)(2) The underlying facts, transactions, and documents					
including but not limited to, disclosures to another financial institution, or		upon which a SAR is based, including but not limited to, disclosures to					
b any director, officer, employee, or agent of a financial institution, for the		another financial institution, or any director, officer, employee, or agent of					
any amenda, employee, or agent or a manetal institution, for the							
preparation of a joint SAR.		a financial institution, for the preparation of a joint SAR.					
The sharing by a casino, or any director, officer, employee, or agent of the		1021.320(e)(1)(ii)(B) The sharing by a casino, or any director, officer,					
casino, of a SAR, or any information that would reveal the existence of a SAR,		employee, or agent of the casino, of a SAR, or any information that would					
		1 1 1 -					
within the casino's corporate organizational structure for purposes consistent		reveal the existence of a SAR, within the casino's corporate organizational					
with Title II of the Bank Secrecy Act as determined by regulation or in		structure for purposes consistent with Title II of the Bank Secrecy Act as					
guidance.		determined by regulation or in guidance.					
A Federal, State, local, territorial, or the Cherokee Nation, or any director,		1021.320(e)(1)(ii)(B)(2) Prohibition on disclosures by government				+	
officer, employee, or agent of any of the foregoing, shall not disclose a SAR, or		authorities . A Federal, State, local, territorial, or Tribal government					
any information that would reveal the existence of a SAR, except as necessary		authority, or any director, officer, employee, or agent of any of the					
to fulfill official duties consistent with Title II of the Bank Secrecy Act (BSA).		foregoing, shall not disclose a SAR, or any information that would reveal					
For purposes of this section, "official duties" shall not include the disclosure of		the existence of a SAR, except as necessary to fulfill official duties					
a SAR, or any information that would reveal the existence of a SAR, in		consistent with Title II of the Bank Secrecy Act (BSA). For purposes of this					
response to a request for disclosure of non-public information or a request for		section, "official duties" shall not include the disclosure of a SAR, or any					
use in a private legal proceeding.		information that would reveal the existence of a SAR, in response to a					
K See in a private regal proceeding.		request for disclosure of non-public information or a request for use in a					
		private legal proceeding, including a request pursuant to 31 CFR 1.11.					
		J. P					

REF	542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions		1021	1010				Revision
A casino, and any director, officer, employee, or agent of any casino, that		1021.320(f) Limitation on liability. A casino, and any director, officer,					
makes a voluntary disclosure of any possible violation of law or regulation to a		employee, or agent of any casino, that makes a voluntary disclosure of					
government agency or makes a disclosure pursuant to this section or any		any possible violation of law or regulation to a government agency or					
other authority, including a disclosure made jointly with another institution,		makes a disclosure pursuant to this section or any other authority,					
shall be protected from liability to any person for any such disclosure, or for		including a disclosure made jointly with another institution, shall be					
failure to provide notice of such disclosure to any person identified in the		protected from liability to any person for any such disclosure, or for					
L disclosure, or both, to the full extent provided by 31 U.S.C. 5318(g)(3).		failure to provide notice of such disclosure to any person identified in the disclosure, or both, to the full extent provided by 31 U.S.C. 5318(g)(3).					
ļ ļ		disclosure, or both, to the full extent provided by 31 0.3.c. 3316(g)(3).					
Supporting documentation shall be identified as such and maintained by the		1021.320(d) Retention of records. A casino shall maintain a copy of any					
casino, and shall be deemed to have been filed with the SAR. A casino shall		SAR filed and the original or business record equivalent of any supporting					
make all supporting documentation available to FinCEN, appropriate law		documentation for a period of five years from the date of filing the					
enforcement agencies, and/or Federal/State gaming regulators upon request.		SAR. Supporting documentation shall be identified as such and					
A copy of the original SAR shall be made available to CNGC upon request.		maintained by the casino, and shall be deemed to have been filed with					
		the SAR. A casino shall make all supporting documentation available to					
		FinCEN, or any Federal, State, or local law enforcement agency, or any Federal regulatory authority that examines the casino for compliance with					
M		the Bank Secrecy Act, or any State regulatory authority administering a					
		State law that requires the casino to comply with the Bank Secrecy Act or					
		otherwise authorizes the State authority to ensure that the casino					
		complies with the Bank Secrecy Act, or any tribal regulatory authority					
ļ ļ		administering a tribal law that requires the casino to comply with the					
ļ ļ		Bank Secrecy Act or otherwise authroizes the tribal regulatory authority to					
ļ ļ		ensure that the casino complies with the Bank Sercrecy Act, upon request.					
ļ							
A casino is not required to file a SAR for a robbery or burglary committed or		1021.320(c) Exceptions. A casino is not required to file a SAR for a					
N attempted that is reported to appropriate law enforcement authorities.		robbery or burglary committed or attempted that is reported to					
		appropriate law enforcement authorities.					
ļ ļ		1021.320(g) Compliance. Casinos shall be examined by FinCEN or its					Casinos shall be examined by FinCEN or its
ļ ļ		delegatees for compliance with this section. Failure to satisfy the				0	delegatees for compliance with this section. Failure
ļ		requirements of this section may be a violation of the Bank Secrecy Act and of this chapter.					to satisfy the requirements of this section may be a violation of Title 31.
18.9 Restricted Transactions.		land of this chapter.					Violation of Title 51.
Procedures for accepting these types of transactions, must include controls				FIN-2010-G002(II) Customer Risk Indicators Non-			
and processes that prevent any financial transactions by or on behalf of, that				resident aliens and foreign nationals with deposit			
go through, or are made in connection with any individual or entity				accounts who are citizens of countries or			
A identified by the Office of Foreign Assets Control (OFAC) from occurring. Any				jurisdictions that are: Sanctioned by the Office of			
attempt by an individual or entity to conduct such financial transactions shall				Foreign Assets Control (OFAC), including those			
be reported to OFAC in accordance with OFAC regulations.				with state sponsored terrorism.			
All cash payments must adhere to authorization and payment restrictions as							
specified in section 4 – General Provisions, section 11– Casino Instruments and							
B Exchanges, and section 13 – Cage Operations and/or other Sections which							
may be applicable.							
18.10 Casino Management Systems/Player Tracking Records.							
For the purpose of complying with Title 31 reporting requirements, if a casino		1021.313 In the case of a casino, multiple currency transactions shall be					
has knowledge of multiple currency transactions, those transactions shall be		treated as a single transaction if the casino has knowledge that they are					
treated as a single transaction if the casino has knowledge that they are by or		by or on behalf of any person and result in either cash in or cash out					
on behalf of any person and result in either cash in or cash out totaling more		totaling more than \$10,000 during any gaming day. For purposes of this					
than Ten Thousand Dollars (\$10,000.00) during any gaming day. For purposes		section, a casino shall be deemed to have the knowledge described in the					
of this section, a casino shall be deemed to have the knowledge described in		preceding sentence, if: Any sole proprietor, partner, officer, director, or					
the preceding sentence, if: Any sole proprietor, partner, officer, director, or		employee of the casino, acting within the scope of his or her					
employee of the casino, acting within the scope of his or her employment, has		employment, has knowledge that such multiple currency transactions					
knowledge that such multiple currency transactions have occurred, including		have occurred, including knowledge from examining the books, records,					
A Uknowledge from examining the books records less information and in the	i	logs, information retained on magnetic disk, tape or other machine-					
A knowledge from examining the books, records, logs, information retained on		the state of the s		1	•	1	i l
magnetic disk, tape or other machine-readable media, or in any manual		readable media, or in any manual system, and similar documents and					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains		information, which the casino maintains pursuant to any law or regulation					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business,		information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain information that such multiple currency transactions have		information, which the casino maintains pursuant to any law or regulation					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business,		information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain information that such multiple currency transactions have		information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain information that such multiple currency transactions have		information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain					
magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain information that such multiple currency transactions have		information, which the casino maintains pursuant to any law or regulation or within the ordinary course of its business, and which contain					

REF		542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
	Section 18 - Financial Transactions		1021	1010		Care Regs		Revision
	A copy of any completed form required to be filed under this Section shall be							
	retained, along with all original or business record equivalent of any							
Α	supporting documentation, in chronological order for five (5) years from the							
	date of filing and must be readily available for inspection.							
	With respect to each deposit of funds, account opened or line of credit		1021.410(a) With respect to each deposit of funds, account opened or					
	extended after the effective date of these regulations, a casino shall, at the		line of credit extended after the effective date of these regulations, a					
	time the funds are deposited, the account is opened or credit is extended,		casino shall at the time the funds are deposited, the account opened or					
	secure and maintain a record of the name, permanent address, and social		credit is extended, secure and maintain a record of the name, permanent					
	security number of the person involved. Where the deposit, account or credit		address, and social security number of the person involved. Where the					
	is in the names of two or more persons, the casino shall secure the name,		deposit, account or credit is in the names of two or more persons, the					
	permanent address, and social security number of each person having a		casino shall secure the name, permanent address, and social security					
	financial interest in the deposit, account or line of credit. The name and		number of each person having a financial interest in the deposit, account					
	address of such person shall be verified by the casino at the time the deposit		or line of credit. The name and address of such person shall be verified by					
	is made, account opened, or credit extended. The verification shall be made by		the casino at the time the deposit is made, account opened, or credit					
	examination of a document of the type described in this Section, and the specific identifying information shall be recorded in the manner described in		extended. The verification shall be made by examination of a document of the type described in 1010.312 of this Chapter, and the specific					
В	this Section. In the event that a casino has been unable to secure the required		identifying information shall be recorded in the manner described in					
	social security number, it shall not be deemed to be in violation of this section		1010.312 of this Chapter. In the event that a casino has been unable to					
	if it has made a reasonable effort to secure such number and it maintains a list		secure the required social security number, it shall not be deemed to be					
	containing the names and permanent addresses of those persons from who it		in violation of this section if it has made a reasonable effort to secure					
	has been unable to obtain social security numbers and makes the names and		such number and maintains a list containing the names and permanent					
	addresses of those persons available to the Secretary upon request. Where a		addresses of those persons from who it has been unable to obtain social					
	person is a nonresident alien, the casino shall also record the person's		security numbers and makes the names and addresses of those persons					
	passport number or a description of some other government document used		available to the Secretary upon request. Where a person is a nonresident					
	to verify his identity.		alien, the casino shall also record the person's passport number or a					
			description of some other government document used to verify his					
			identity.					
С	In addition, each casino shall retain either the original or a copy or		1021.410(b) In addition, each casino shall retain either the original or a					
	reproduction of each of the following:  A record of each receipt (including but not limited to funds for safekeeping or		copy or reproduction of each of the following:					
	front money) of funds by the casino for the account (credit or deposit) of any		1021.410(b)(1) A record of each receipt (including but not limited to funds for safekeeping or front money) of funds by the casino for the					
	person. The record shall include the name, permanent address and social		account (credit or deposit) of any person. The record shall include the					
	security number of the person from whom the funds were received, as well as		name, permanent address and social security number of the person from					
	the date and amount of the funds received. If the person from whom the		whom the funds were received, as well as the date and amount of the					
1	funds were received is a non-resident alien, the person's passport number or a		funds received. If the person from whom the funds were received is a non-					
	description of some other government document used to verify the person's		resident alien, the person's passport number or a description of some					
	identity shall be obtained and recorded;		other government document used to verify the person's identity shall be					
			obtained and recorded;					
	A record of each bookkeeping entry comprising a debit or credit to a		1021.410(b)(2) A record of each bookkeeping entry comprising a debit or					
2	customer's deposit Account or credit account with the casino;		credit to a customer's deposit account or credit account with the casino;					
			·					
	Each statement, ledger card or other record of each deposit account or credit		1021.410(b)(3) Each statement, ledger card or other record of each					
3	account with the casino, showing each transaction (including deposits,		deposit account or credit account with the casino, showing each					
	receipts, withdrawals, disbursements or transfers) in or with respect to, a customer's deposit account or credit account with the casino;		transaction (including deposits, receipts, withdrawals, disbursements or transfers) in or with respect to, a customer's deposit account or credit					
L	suppose decount of create decount with the casino,		account with the casino:					
	A record of each extension of credit in excess of \$2,500, the terms and		1021.410(b)(4) A record of each extension of credit in excess of					
	conditions of such extension of credit, and repayments. The record shall		\$2,500.00, the terms and conditions of such extension of credit, and					
	include the customer's name, permanent address, social security number, and		repayments. The record shall include the customer's name, permanent					
4	the date and amount of the transaction (including repayments). If the		address, social security number, and the date and amount of the					
	customer or person for whom the credit extended is a non- resident alien, his		transaction (including repayments). If the customer or person for whom the credit is extended is a non-resident alien, his passport number or					
	passport number or description of some other government document used to verify his identity shall be obtained and recorded;		description of some other government document used to verify his					
	verity his rectificty shall be obtained and recorded,		identity shall be obtained and recorded;					
-	A record of each advice request or instruction received or given by the easier							
	A record of each advice, request or instruction received or given by the casino for itself or another person with respect to a transaction involving a person,		1021.410(b)(5) A record of each advice, request or instruction received or given by the casino for itself or another person with respect to a					
	account or place outside the United States (including but not limited to		transaction involving a person, account or place outside the United States					
	communications by wire, letter, or telephone). If the transfer outside the		(including but not limited to communications by wire, letter, or					
	United States is on behalf of a third party, the record shall include the third		telephone). If the transfer outside the United States is on behalf of a third					
	party's name, permanent address, social security number, signature, and the		party, the record shall include the third party's name, permanent address,					
	date and amount of the transaction. If the transfer is received from outside the		social security number, signature, and the date and amount of the					
5	United States on behalf of a third party, the record shall include the third		transaction. If the transfer is received from outside the United States on					
	party's name, permanent address, social security number, signature, and the		behalf of a third party, the record shall include the third party's name,					
	date and amount of the transaction. If the person for whom the transaction is		permanent address, social security number, signature, and the date and					
	being made is a non-resident alien the record shall also include the person's		amount of the transaction. If the person for whom the transaction is					
	name, his passport number or a description of some other government		being made is a non-resident alien the record shall also include the					
	document used to verify his identity;		person's name, his passport number or a description of some other					
			government document used to verify his identity;					

F	542	Title 31, Chapter X		FinCEN Guidance	Other Regs	REF	Recommended
Section 18 - Financial Transactions		1021	1010				Revision
Records prepared or received by the casino in the ordinary course of business		1021.410(b)(6) Records prepared or received by the casino in the					
which would be needed to reconstruct a person's deposit account or credit		ordinary course of business which would be needed to reconstruct a					
account with the casino or to trace a check deposited with the casino through		person's deposit account or credit account with the casino or to trace					
the casino's records to the bank of deposit;		checks deposited with the casino through the casino's records to the bank					
·		of deposit:					
All records, documents or manuals required to be maintained by a casino		1021.410(b)(7) All records, documents, or manuals required to be					
under the Tribal-State Compact or the CNGC regulations;		maintained by a casino under state and local laws or regulations,					
		regulations of any governing Indian tribe or tribal government, or terms					
		of (or any regulations issued under) any Tribal-State compacts entered					
		into pursuant to the Indian Gaming Regulatory Act, with respect to the					
		casino in question					
All records which are prepared or used by a casino to monitor a customer's		1021.410(b)(8) All records which are prepared or used by a casino to					
gaming activity.		monitor a customer's gaming activity.					
A copy of the compliance program described in this Section.		1021.410(b)(10) A copy of the compliance program described in					
		§1021.210(b).					
Casinos which input, store, or retain, in whole or in part, for any period of time,		1021.410(c)(1) Casinos which input, store, or retain, in whole or in part,					
any record required to be maintained by this Section on computer disk, tape,		for any period of time, any record required to be maintained by 1010.410					
or other machine-readable media shall retain the same on computer disk,		of this Chapter or this section on computer disk, tape, or other machine-					
tape, or machine-readable media.		readable media shall retain the same on computer disk, tape, or machine-					
		readable media.					
All indexes, books, programs, record layouts, manuals, formats, instructions,		1021.410(c)(2) All indexes, books, programs, record layouts, manuals,					
file descriptions, and similar materials which would enable a person readily to		formats, instructions, file descriptions, and similar materials which would					
access and review the records that are described in this Section and that are		enable a person readily to access and review records that are described in					
input, stored, or retained on computer disk, tape, or other machine-readable		1010.410 of this Chapter and this section and that are input, stored, or					
media shall be retained for the period of time such records are required to be		retained for the period of time such records are required to be retained.					
retained.							
12 Title 31 Compliance Officer Standards.							
The Compliance Officer so designated by the gaming operations under their							
Compliance Program pursuant to Title 31 shall:							
Ensure that a training program is established, maintained and effective.							
Ensure that the SICS relative to Title 31 is established, maintained and							
effective.							
13 Training Program.							
A training program shall be established and maintained to instruct employees							
as to the requirements of Title 26 and Title 31, the Financial Transaction							
Reporting TICS, and the gaming operations related SICS.							

REF	CN TICS	542	NIGC Class III Guidance	543 Tribal - State Compact	Other Regulations	 Recommended Revisions
KEF	Section 19 - Accounting	542	BULLETIN 2018-3	543 Tribai - State Compact	Other Regulations	Recommended Revisions
19 1	Departmental Standards.		BULLETIN 2010-3			
13.1		542.19(a) Each gaming operation shall prepare			4 CNCA § 40(A) It shall be the responsibility of the Gaming	
		accurate, complete, legible, and permanent			Commission to promulgate regulations and ensure the gaming	
	transactions pertaining to revenue and gaming				operation establishes proper gaming accounting procedures and	
	. 3	. 3				
	activities.	and gaming activities.			methods of operations for all licensees of Class II or Class III gaming	
					activities so that all monies or things of value received and paid out	
					may be properly monitored and accounted. All gaming facilities	
					under the jurisdiction of the Gaming Commission shall be required to	
					keep an approved gaming accounting system that shall comply with,	
Α					but not be limited to, all applicable provisions of this Act and/or	
					regulations of the Gaming Commission. Said accounting system shall	
					reflect all business and financial transactions involved or connected in	
					any manner with the gaming operation and conducting of gaming	
					activities authorized by this Act. The Gaming Commission shall have	
					the right to access such records or to secure a court order to seize	
					records or property not surrendered.	
	Conflicts of standards. When establishing SICS,		14(a) Conflicts of standards. When establishing	543.23(a) Conflicts of standards. When	4 CNCA § 40(A) It shall be the responsibility of the Gaming	
	the gaming operation should review, and		SICS, the gaming operation should review, and	establishing SICS, the gaming operation should	Commission to promulgate regulations and ensure the gaming	
	consider incorporating, other external standards		1		operation establishes proper gaming accounting procedures and	
	. 5				1	
	such as GAAP, GAAS, and standards		such as GAAP, GAAS, and standards	external standards such as GAAP, GAAS, and	methods of operations for all licensees of Class II or Class III gaming	
	promulgated by GASB and FASB. In the event of			standards promulgated by GASB and FASB. In	activities so that all monies or things of value received and paid out	
	a conflict between the MICS and the		a conflict between the MICS and the	the event of a conflict between the MICS and	may be properly monitored and accounted. All gaming facilities	
	incorporated external standards, the external		incorporated external standards, the external	the incorporated external standards, the external	under the jurisdiction of the Gaming Commission shall be required to	
_	standards prevail.		standards prevail.	standards prevail.	keep an approved gaming accounting system that shall comply with,	
В					but not be limited to, all applicable provisions of this Act and/or	
					regulations of the Gaming Commission. Said accounting system shall	
					reflect all business and financial transactions involved or connected in	
					any manner with the gaming operation and conducting of gaming	
					activities authorized by this Act. The Gaming Commission shall have	
					· · · · · · · · · · · · · · · · · · ·	
					the right to access such records or to secure a court order to seize	
					records or property not surrendered.	
19.2	General Accounting Standards.					
	Controls must be established and procedures		14(b) Accounting. Controls must be established	543.23(b) Accounting. Controls must be	4 CNCA § 40(A) It shall be the responsibility of the Gaming	
	implemented to safeguard assets and ensure		and procedures implemented to safeguard	established and procedures implemented to	Commission to promulgate regulations and ensure the gaming	
	each gaming operation:		assets and ensure each gaming operation:	safeguard assets and ensure each gaming	operation establishes proper gaming accounting procedures and	
	J. J. J. J. J. J. J. J. J. J. J. J. J. J		g. g.p.	operation:	methods of operations for all licensees of Class II or Class III gaming	
				operation.	activities so that all monies or things of value received and paid out	
					_ · · · · · · · · · · · · · · · · · · ·	
					may be properly monitored and accounted. All gaming facilities	
					under the jurisdiction of the Gaming Commission shall be required to	
^					keep an approved gaming accounting system that shall comply with,	
A					but not be limited to, all applicable provisions of this Act and/or	
					regulations of the Gaming Commission. Said accounting system shall	
					reflect all business and financial transactions involved or connected in	
					any manner with the gaming operation and conducting of gaming	
					activities authorized by this Act. The Gaming Commission shall have	
					the right to access such records or to secure a court order to seize	
					records or property not surrendered.	
					receives or property not surremered.	
	Prepares accurate, complete, legible, and		14(b)(1) Prepares accurate, complete, legible,	543.23(b)(1) Prepares accurate, complete,		
	permanent records of all transactions pertaining		and permanent records of all transactions	legible, and permanent records of all		
1	to gaming revenue and activities for operational		pertaining to gaming revenue and activities for	transactions pertaining to gaming revenue and		
	accountability.		operational accountability.	activities for operational accountability.		
			The state of the s			
	Prepares general accounting records according	542.19(b) Each gaming operation shall prepare	14(b)(2) Prepares general accounting records on	543.23(b)(2) Prepares general accounting 5(C)(5) Books and records on all covered game		
	to Generally Accepted Accounting Principles on		a double-entry system of accounting,	records on a double-entry system of accounting, activities of the enterprise shall be maintained in		
				1 · · · · · · · · · · · · · · · · · · ·		
2			maintaining detailed, supporting, subsidiary	maintaining detailed, supporting, subsidiary accordance with generally accepted accounting		
2		double-entry system of accounting, maintaining	records, and performs the following activities:	records, and performs the following activities: principles (GAAP); and		
		detailed, supporting, subsidiary records,				
		including, but not limited to:				
		542.19(b)(1) Detailed records identifying				
а	expenses, assets, liabilities, and equity for each	revenues, expenses, assets, liabilities, and equity				
	gaming operation;	for each gaming operation;				
					<u> </u>	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Regulations	Recommended Revisions
KEF	Section 19 - Accounting	542	BULLETIN 2018-3	543	Tribai - State Compact	Other Regulations	Recommended Revisions
	Record gaming activity transactions in an			543.23(b)(2)(i) Record gaming activity			
1 .	accounting system to identify and track all		1	transactions in an accounting system to identify			
b	revenues, expenses, assets, liabilities, and equity	;	revenues, expenses, assets, liabilities, and equity;				
				liabilities, and equity;			
	Prepare transactions in accordance with the		14(b)(2)(vii) Prepare transactions in accordance	543.23(b)(2)(vii) Prepare transactions in			
С	appropriate authorization, as provided by		with the appropriate authorization, as provided	accordance with the appropriate authorization,			
	management;		by management;	as provided by management;			
<u> </u>	B 11 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		1441 (2)( ''') D	542 224 V2V "" P			
	Record transactions to facilitate proper			543.23(b)(2)(viii) Record transactions to facilitate			
d	recording of gaming revenue and fees, and to maintain accountability of assets;		i	proper recording of gaming revenue and fees, and to maintain accountability of assets;			
	maintain accountability of assets,		and to maintain accountability of assets,	and to maintain accountability of assets,			
	Compare recorded accountability for assets to		14(b)(2)(ix) Compare recorded accountability for	543.23(b)(2)(ix) Compare recorded accountability			
	actual assets at periodic intervals, and take		1	for assets to actual assets at periodic intervals,			
е	appropriate action with respect to any variances	;	I -	and take appropriate action with respect to any			
			1	variances;			
f	Segregate functions, duties, and responsibilities;	; <u> </u>	14(b)(2)(x) Segregate functions, duties, and	543.23(b)(2)(x) Segregate functions, duties, and			
<u> </u>			responsibilities;	responsibilities;			
q	Prepare minimum bankroll calculations;			543.23(b)(2)(xi) Prepare minimum bankroll			
		542.10(1)(2) D	calculations; and	calculations; and			
h	Record all markers, IOU's, returned checks, held		1	543.23(b)(2)(ii) Record all markers, IOU's,			
n	checks, or other similar credit instruments;	IOU's, returned checks, hold checks, or other similar credit instruments;		returned checks, held checks, or other similar			
	Prepare individual and statistical game records	542.19(b)(3) Individual and statistical game	instruments;	credit instruments;			+ +
	to reflect statistical drop, statistical win, and the	_					
	percentage of statistical win to statistical drop	and the percentage of statistical win to statistical					
	for each table game, and to reflect statistical	drop by each table game, and to reflect					
	drop, statistical win, and the percentage of	statistical drop, statistical win, and the					
i	statistical win to statistical drop for each type of	percentage of statistical win to statistical drop					
'	table game, by shift, by day, cumulative month-	for each type of table game, by shift, by day,					
	to-date and year-to-date, and individual and	cumulative month-to-date and year-to-date,					
	statistical game records reflecting similar	and individual and statistical game records					
	information for all other games;	reflecting similar information for all other					
		games;					
	Prepare gaming machine analysis reports which,	, 542.19(b)(4) Gaming machine analysis reports					
	by each machine, compare actual hold	which, by each machine, compare actual hold					
,	percentages to theoretical hold percentages;	percentages to theoretical hold percentages;					
1 .	Prepare records required by the Tribal Internal	542.19(b)(5) The records required by this part					
k	Control Standards and any other records	and by the Tribal internal control standards;					
$\vdash$	required to be maintained; Record journal entries prepared by the gaming	542.19(b)(6) Journal entries prepared by the	14(b)(2)(iii) Record journal entries prepared by	543.23(b)(2)(iii) Record journal entries prepared			
	operation and by any independent accountants			by the gaming operation and by any			
'	used;	accountants; and		independent accountants used;			
	Prepare income statements and balance sheets;			543.23(b)(2)(iv) Prepare income statements and			
m				balance sheet;			
	Prepare appropriate subsidiary ledgers to		1	543.23(b)(2)(v) Prepare appropriate subsidiary			
n	support the balance sheet;		ledgers to support the balance sheet;	ledgers to support the balance sheet;			
<u> </u>	December and series of Control	-	14/5/(2)(-i) Program and	E42 22(h)(2)(h) Deserves			+ + +
О	Prepare, review, and maintain accurate financial			543.23(b)(2)(vi) Prepare, review, and maintain			
$\vdash$	statements; Maintain and preserve all financial records and		accurate financial statements; 14(b)(2)(xii) Maintain and preserve all financial	accurate financial statements; 543.23(b)(2)(xii) Maintain and preserve all			+ +
n	relevant supporting documentation.			financial records and relevant supporting			
	Total Supporting documentation.		1 ,	documentation.			
		542.19(b)(7) Any other records specifically					Any other records specifically required to be
		required to be maintained.					q maintained.
	Each gaming operation shall establish	542.19(c) Each gaming operation shall establish					
	administrative and accounting procedures for	administrative and accounting procedures for					
	the purpose of determining effective control	the purpose of determining effective control					
3	over a gaming operation's fiscal affairs. The	over a gaming operation's fiscal affairs. The					
	procedures shall be designed to reasonably	procedures shall be designed to reasonably					
	ensure that:	ensure that:					
a	Assets are safequarded;	542.19(c)(1) Assets are safeguarded;					<del>                                     </del>
	Financial records are accurate and reliable;	542.19(c)(2) Financial records are accurate and					
Ь		reliable;					

DEF	CN TICS	542	NICC Class IV Codd-	E42	Tribal State Comment	Othor Dogulations	Decomposed of Posicions
REF	CN TICS Section 19 - Accounting	542	NIGC Class III Guidance BULLETIN 2018-3	543	Tribal - State Compact	Other Regulations	Recommended Revisions
	Transactions are performed only in accordance	542.19(c)(3) Transactions are performed only in					
С	with management's general and specific	accordance with management's general and					
	authorization;	specific authorization;					
		542.19(c)(4) Transactions are recorded					
d	proper reporting of gaming revenue and of fees	adequately to permit proper reporting of					
	and taxes, and to maintain accountability of	gaming revenue and of fees and taxes, and to					
	assets; Recorded accountability of assets is compared	maintain accountability of assets; 542.19(c)(5) Recorded accountability for assets is		543.23(b)(2)(ix) Compare recorded accountability			
	with actual assets at reasonable intervals and	compared with actual assets at reasonable		for assets to actual assets at periodic intervals,			
е	appropriate action is taken with respect of any	intervals, and appropriate action is taken with		and take appropriate action with respect to any			
	discrepancies; and,	respect to any discrepancies; and		variances;			
	Functions, duties, and responsibilities are	542.19(c)(6) Functions, duties, and					
f	appropriately segregated in accordance with	responsibilities are appropriately segregated in					
,	sound business practices.	accordance with sound business practices.					
R	Complies with fee calculation requirements set forth by the NIGC and the Tribal-State Compact.						
	lorth by the Nide and the mbar-state compact.						
	For table games, gross revenue equals the	542.19(d) Gross gaming revenue computations.					
	closing table bankroll, plus credit slips for cash,	For table games, gross revenue equals the					
	chips, tokens or personal/payroll checks	closing table bankroll, plus credit slips for cash,					
	returned to the cage, plus drop, less opening	chips, tokens or personal/payroll checks					
	table bankroll and fills to the table, and money	returned to the cage, plus drop, less opening					
	transfers issued from the game through the use	table bankroll and fills to the table, and money					
	of a cashless wagering system.	transfers issued from the game through the use					
		of a cashless wagering system.					
	For gaming machines, gross revenue equals	542.19(d)(2) For gaming machines, gross					
	drop, less fills, jackpot payouts and personal	revenue equals drop, less fills, jackpot payouts					
	property awarded to customers as gaming	and personal property awarded to patrons as					
	winnings. Additionally, the initial hopper load is	gambling winnings. Additionally, the initial					
		hopper load is not a fill and does not affect					
D	difference between the initial hopper load and	gross revenue. The difference between the					
	the total amount that is in the hopper at the end	* *					
	of the gaming operation's fiscal year should be	in the hopper at the end of the gaming					
	adjusted accordingly as an addition to or	operation's fiscal year should be adjusted					
	subtraction from the drop for the year.	accordingly as an addition to or subtraction					
L		from the drop for the year.		<u>                                     </u>			
F	For each counter game, gross revenue equals:	542.19(d)(3) For each counter game, gross					
		revenue equals:					
	The money accepted by the gaming operation	542.19(d)(3)(i) The money accepted by the					
1	on events or games that occur during the	gaming operation on events or games that					
1	month or will occur in subsequent months	occur during the month or will occur in					
'		subsequent months, less money paid out during the month to patrons on winning wagers ("cash					
	month to customers on winning wagers (cash basis); or,	basis"); or					
	343.5), 31,	3333 // 51					
	The money accepted by the gaming operation	542.19(d)(3)(ii) The money accepted by the					
	on events or games that occur during the	gaming operation on events or games that					
1		occur during the month, plus money, not					
	gross revenue, that was accepted by the gaming						
2	operation in previous months on events or	accepted by the gaming operation in previous					
1		months on events or games occurring in the					
	out during the month to customers as winning	month, less money paid out during the month to patrons as winning wagers ("modified accrual					
	wagers (modified accrual basis).	hasis")					
	For each card game and any other game in	542.19(d)(4) For each card game and any other			N	IGC Bulletin 2003-4, Other Compensation. For card games,	
	which the gaming operation is not a party to a	game in which the gaming operation is not a			to	ournaments and any other games in which the casino is not a party	
	wager (non- house banked games), gross	party to a wager, gross revenue equals all				a wager, gross gaming revenue shall include all money received as	
F	revenue equals all money received by the	money received by the operation as				ompensation for conducting the game, i.e. rake, commissions, entry	
	operation as compensation for conducting the	compensation for conducting the game.			fe	ees, and admission fees.	
1	game (i.e. rake, ante, commissions, entry fee,						
	and admission fees).						
	A gaming operation shall not include either shill	542.19(d)(4)(i) A gaming operation shall not					
1	win or loss in gross revenue computations.	include either shill win or loss in gross revenue					
	<u> </u>	computations.					

REF	CN TICS	542	NIGC Class III Guidance	543 Tribal - State Compact	Other Regulations		Recommended Revisions
G	gaming operation of any personal property distributed as losses to customers may be deducted from winnings (other than costs of	542.19(d)(4)(ii) In computing gross revenue for e gaming machines, keno and bingo, the actual cost to the gaming operation of any personal property distributed as losses to patrons may be deducted from winnings (other than costs of f travel, lodging, services, food, and beverages), if the gaming operation maintains detailed documents supporting the deduction.	BULLETIN 2018-3				
Н		from a patron in the gaming area is promptly placed in a locked box in the table, or, in the case of a cashier, in the appropriate place in the cashier's cage, or on those games which do not have a locked drop box, or on card game tables,					
н	cost of a payment plan, which is funded by the operation, may be deducted from winnings. The operation is required to obtain the approval of all payment plans from the CNGC. For any funding method which merely guarantees the gaming operation's performance, and under which the operation makes payments out of cash flow (e.g. irrevocable letters of credits, surety bonds, or other similar methods), the	542.19(f) If the gaming operation provides periodic payments to satisfy a payout resulting all from a wager, the initial installment payment, when paid, and the actual cost of a payment plan, which is funded by the gaming operation, may be deducted from winnings. The gaming operation is required to obtain the approval of all payment plans from the TGRA. For any funding method which merely guarantees the gaming operation's performance, and under which the gaming operation makes payments out of cash flow (e.g. irrevocable letters of credits, surety bonds, or other similar methods), the gaming operation may only deduct such payments when paid to the patron. (Adopted May 11, 2006)				I	
I	For payouts by wide-area progressive gaming machine systems, a gaming operation may deduct from winnings only its pro rata share of wide-area gaming machine system payout.	542.19(g) For payouts by wide-area progressive gaming machine systems, a gaming operation a may deduct from winnings only its pro rata share of a wide-area gaming machine system payout. (Adopted May 11, 2006)			NIGC Bulletin 2003-4, Inter-Casino Linked Systems (includes Wide Area Progressive Systems). A gaming operation may deduct from winnings only its pro-rata share of inter-casino linked system payouts. It is not permissible to deduct amounts to cover payments of fees, costs, or expenses associated with, or attributable to, adminstrating the inter-casino system, or similar such enterprise.	J	
J	unredeemed ticket previously included in gross	machine or gaming device shall be deducted from gross revenue as jackpot payouts in the month the tickets are issued by the gaming machine or gaming device. Tickets deducted from gross revenue that are not redeemed				K	
K 19.3	A gaming operation may not deduct from gross revenues the unpaid balance of a credit instrument extended for purposes other than gaming.  Maintenance and Preservation of Books,	s 542.19(i) A gaming operation may not deduct from gross revenues the unpaid balance of a credit instrument extended for purposes other than gaming. 542.19(k) Maintenance and preservation of				L	
19.3	Records, and Documents.	books, records and documents.					

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Regulations		Recommended Revisions
	Section 19 - Accounting		BULLETIN 2018-3					
	All books, records, and documents pertaining to	o 542.19(k)(1) All original books, records and			Part 5(C) Records. In addition to other records			
	the conduct of wagering activities shall be	documents pertaining to the conduct of			required to be maintained herein, the enterprise			
	retained by a gaming operation in accordance	wagering activities shall be retained by a gaming			or tribe shall maintain the following records			
	with the following schedule. A record that	operation in accordance with the following			related to implementation of this Compact in			
	summarizes transactions is sufficient, provided	1 '			permanent form and as written or entered,			
	that all documents containing an original	transactions is sufficient, provided that all			whether manually or by computer, and which			
	3 3	ed documents containing an original signature(s)			shall be maintained by the enterprise and made			
	transaction are independently preserved.				available for inspection by the SCA for no less			
А	Original books, records, or documents shall not	attesting to the accuracy of a gaming related			than three (3) years from the date generated.			
	3				than three (5) years from the date generated.			
		Original books, records or documents shall not						
	that contain original comments or notations or							
	1	that contain original comments or notations on						
		ed parts of multi-part forms. The following original						
	by the gaming operation for a minimum of five	books, records and documents shall be retained						
	(5) years:	by a gaming operation for a minimum of five (5)						
		years:						
1	Casino Cage/Vault documents.	542.19(k)(1)(i) Casino cage documents;						
	Documentation supporting the calculation of	542.19(k)(1)(i) Casino cage documents; 542.19(k)(1)(ii) Documentation supporting the						
2								
	table game win;	calculation of table game win;					<u> </u>	
3	Documentation supporting the calculation of	542.19(k)(1)(iii) Documentation supporting the						
	gaming machine win;	calculation of gaming machine win;					-	
	Documentation supporting the calculation of	542.19(k)(1)(iv) Documentation supporting the						
	revenue received from games of pari-mutuel,	calculation of revenue received from the games						
4	keno, bingo, card games, pull-tabs, and all other							
	gaming activities offered by the gaming	games, and all other gaming activities offered by						
	operation;	the gaming operation;						
5	Table games statistical analysis reports;	542.19(k)(1)(v) Table games statistical analysis						
		reports;						
6	Gaming machine statistical analysis reports;	542.19(k)(1)(vi) Gaming machine statistical						
U		analysis reports;						
7	Bingo, pull-tab, keno and pari- mutuel wagerin	g 542.19(k)(1)(vii) Bingo, pull-tab, keno and pari-						
	statistical reports; and,	mutuel wagering statistical reports;						
0	Internal audit documentation and reports;	542.19(k)(1)(viii) Internal audit documentation						
ŏ		and reports;						
	Documentation supporting the write-off of	542.19(k)(1)(ix) Documentation supporting the						
9	approved credit instruments;	write-off of gaming credit instruments and						
		named credit instruments;						
	All other books, records and documents	542.19(k)(1)(x) All other books, records and						
	pertaining to the conduct of wagering activities							
10	that contain original signature(s) attesting to th	. 9						
	accuracy of the gaming related transaction.	signature(s) attesting to the accuracy of the						
	decaracy of the gammy related transaction.	gaming related transaction						
	Unless otherwise specified in this part all other	542.19(k)(2) Unless otherwise specified in this						
	•	ed part, all other books, records, and documents						
	until such time as the accounting records have							
В								
	been audited by the gaming operation's	accounting records have been audited by the						
	independent certified public accountants.	gaming operation's independent certified public						
	The above requirements shall apply with and	accountants.						
	The above requirements shall apply without	542.19(k)(3) The above definition shall apply						
	regards to the medium by which the book,	without regards to the medium by which the						
С	record, or document is generated or maintained							
	(paper, computer- generated, magnetic media,							
	etc.).	magnetic media, etc.).						

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Regulations	Recommended Revisions
	Section 19 - Accounting		BULLETIN 2018-3		·	j	
19.1	General Standards.					1 20151 5 1600 7: 1 111 11 11 11 11 11 11 11 11	
		571.5 Entry of premises. (a) The Commission's authorized representative may enter the				4 CNCA § 40(A) It shall be the responsibility of the Gaming Commission to promulgate regulations and ensure the gaming	
	keep an approved gaming accounting system that shall comply with, but not be limited to the					operation establishes proper gaming accounting procedures and	
		inspect, examine, photocopy, and audit all				methods of operations for all licensees of Class II or Class III gaming	
	the CNGC. Said accounting system shall reflect	papers, books, and records (including computer				activities so that all monies or things of value received and paid out	
	all business and financial transactions involved	records) concerning: (1) Gross revenue of class II				may be properly monitored and accounted. All gaming facilities	
	or connected in any manner with the gaming	gaming conducted on Indian lands; and (2) Any				under the jurisdiction of the Gaming Commission shall be	
	operation and conducting of gaming activities	matters necessary to carry out the duties of the				required to keep an approved gaming accounting system that	
Α	authorized by the CNGC. The CNGC and/or the	Commission under the Act and this chapter.				shall comply with, but not be limited to, all applicable provisions	
	NIGC or it's authorized agent(s) shall have access to and the right to inspect, examine, photocopy,					of this Act and/or regulations of the Gaming Commission. Said accounting system shall reflect all business and financial	
	and audit all papers, books, and records					transactions involved or connected in any manner with the	
	(including computer records).					gaming operation and conducting of gaming activities authorized	
						<b>by this Act.</b> The Gaming Commission shall have the right to access	
						such records or to secure a court order to seize records or property	
						not surrendered.	
В	Use of Net Revenues.	F22 4(b)(2) A tribe shall use not			Part 5(D) Use of Net Revenues.	4 CNCA \$ 29. The Charakes Nation will have the anti-	
	All net revenues from gaming activities are not to be used for purposes other than:	522.4(b)(2) A tribe shall use net revenues from any tribal gaming or from any individually			Part 5(D) Use of Net Revenues. Net Revenues that the tribe receives from covered games are	4 CNCA § 38 The Cherokee Nation will have the sole proprietary interest in and responsibility for the conduct of any gaming activity	
	to be used for purposes other tildif.	owned games only for one or more of the			to be used for any one or more of those	performed under a Class II or Class III license and all net revenues	
		following purposes:			purposes permitted under IGRA:	from any said gaming are to be used for tribal purposes including:	
	To fund tribal government operations or	522.4(b)(2)(i) To fund tribal government			Part 5(D)(1) To fund tribal government	4 CNCA § 38(A) To fund tribal government operations or programs;	
1	programs;	opertions or programs;			operations or programs;		
	To provide for the general welfare of the tribe	522.4(b)(2)(ii) To provide for the general welfare			Part 5(D)(2) To provide for the general welfare of	4 CNCA § 38(B) To provide for the general welfare of the Cherokee	
	and its members;	of the tribe and its members (if a tribe elects to			the tribe and its members;	Nation and its tribal members;	
2		make per capita distributions, the plan must be					
		approved by the Secretary of the Interior under					
		25 U.S.C. 2710(b)(3));					
	To promote tribal economic development;	522.4(b)(2)(iii) To promote tribal economic			Part 5(D)(3) To promote tribal economic	4 CNCA § 38(C) To promote tribal economic development;	
3		development;			development;		
	To donate to charitable organizations; or	522.4(b)(2)(iv) To donate to charitable			Part 5(D)(4) To donate to charitable	4 CNCA § 38(D) To donate to charitable organizations; or	
4	-	organizations; or			organizations; or	_	
4							
	To help fund operations of local government	522.4(b)(2)(v) To help fund operations of local			Part 5(D)(5) To help fund operations of local	4 CNCA § 38(E) To help fund operations of local government	
5	agencies.	government agencies;			government agencies.	agencies.	
19.2	Accounting Standards.		14(b) Accounting.	543.23(b) Accounting.			
	Controls must be established and administrative	542.19(c) Each gaming operation shall establish	14(b) Controls must be established and	543.23(b) Controls must be established and		4 CNCA § 40(A) It shall be the responsibility of the Gaming	
	procedures implemented to safeguard assets and ensure financial records are accurate and	administrative and accounting procedures for the purpose of determining effective control	procedures implemented to safeguard assets and ensure each gaming operation:	procedures implemented to safeguard assets and ensure each gaming operation:	The manning or services of the services	Commission to promulgate regulations and ensure the gaming operation establishes proper gaming accounting procedures and	
	reliable. Accounting procedures shall be	over a gaming operation's fiscal affairs. The	and ensure even gamming operation.	and ensure each gaming operation.	The gaming operation shall establish an accounting system, which shall reflect all	methods of operations for all licensees of Class II or Class III gaming	
	designed to provide effective control over the	procedures shall be designed to reasonably			business and financial transactions involved or	activities so that all monies or things of value received and paid out	
	operation's fiscal affairs, in which each gaming	ensure that:			connected in any manner with the gaming	may be properly monitored and accounted. All gaming facilities	
	operation:				operation and conduct of gaming activities and	under the jurisdiction of the Gaming Commission shall be required to	
Δ		542.19(c)(1) Assets are safeguarded;			is comprised of written polices, procedures,	keep an approved gaming accounting system that shall comply with,	
^		542.19(c)(2) Financial records are accurate and			accounting methodologies, and standard	but not be limited to, all applicable provisions of this Act and/or	
		reliable;			operating procedures specifically designed to	regulations of the Gaming Commission. Said accounting system shall reflect all business and financial transactions involved or connected in	
					create a system of checks and balances to	any manner with the gaming operation and conducting of gaming	
					safeguard the integrity of a gaming operation and protect its assets from unauthorized access,	activities authorized by this Act. The Gaming Commission shall have	
					misappropriation, forgery, theft, or fraud.	the right to access such records or to secure a court order to seize	
					The second secon	records or property not surrendered.	
	Prepares accurate, complete, legible, and	542.19(a) Each gaming operation shall prepare	14(b)(1) Prepares accurate, complete, legible,	543.23(b)(1) Prepares accurate, complete,			
-	permanent records of all transactions pertaining	accurate, complete, legible, and permanent	and permanent records of all transactions	legible, and permanent records of all			
1			pertaining to gaming revenue and activities for	transactions pertaining to gaming revenue and			
	accountability.	and gaming activities.	operational accountability.	activities for operational accountability.			
1			1	Í.	1	1	L

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REF	CN TICS Section 19 - Accounting	542	NIGC Class III Guidance BULLETIN 2018-3	543	Tribal - State Compact	Other Regulations		Recommended Revisions
	Prepares general accounting records according	542.19(b) Each gaming operation shall prepare		543.23(b)(2) Prepares general accounting	5(C)(5) Books and records on all covered game			
	to Generally Accepted Accounting Principles on	general accounting records according to	a double-entry system of accounting,	records on a double-entry system of accounting	, activities of the enterprise shall be maintained in			
	a double-entry system of accounting,	Generally Accepted Accounting Principles on a	maintaining detailed, supporting, subsidiary	maintaining detailed, supporting, subsidiary	accordance with generally accepted accounting			
2	maintaining detailed, supporting, subsidiary	double-entry system of accounting, maintaining	records, and performs the following activities:	records, and performs the following activities:	principles (GAAP); and			
	records, including, but not limited to:	detailed, supporting, subsidiary records,						
	-	including, but not limited to:						
	Prepares detailed records of gaming activity	542.19(b)(1) Detailed records identifying	14(b)(2)(i) Record gaming activity transactions	543.23(b)(2)(i) Record gaming activity		CNCA		
	transactions in an accounting system to identify	revenues, expenses, assets, liabilities, and equity		transactions in an accounting system to identify				
d	and track all revenues, expenses, assets,	for each gaming operation;	revenues, expenses, assets, liabilities, and equity;	and track all revenues, expenses, assets,				
	liabilities (indebtedness), and equity for each gaming operation:			liabilities, and equity;				
	Prepares detailed records of all markers, IOU's,	542.19(b)(2) Detailed records of all markers,	14(b)(2)(ii) Record all markers, IOU's, returned	543.23(b)(2)(ii) Record all markers, IOU's,				
b	returned checks, held checks, or other similar	IOU's, returned checks, hold checks, or other	checks, held checks, or other similar credit	returned checks, held checks, or other similar				
	credit instruments;	similar credit instruments;	instruments;	credit instruments;				
	Records journal entries prepared by the gaming	542.19(b)(6) Journal entries prepared by the	14(b)(2)(iii) Record journal entries prepared by	543.23(b)(2)(iii) Record journal entries prepared				
С	operation and by any independent accountants	gaming operation and by its independent	the gaming operation and by any independent	by the gaming operation and by any				
		accountants; and	accountants used;	independent accountants used;				
d	Prepares income statements and balance sheets	;	14(b)(2)(iv) Prepare income statements and	543.23(b)(2)(iv) Prepare income statements and				
-			balance sheets;	balance sheet;				
_	Prepares appropriate subsidiary ledgers to		14(b)(2)(v) Prepare appropriate subsidiary	543.23(b)(2)(v) Prepare appropriate subsidiary				
е	support the balance sheet;		ledgers to support the balance sheet;	ledgers to support the balance sheet;				
	Prepares, reviews, and maintains accurate		14(b)(2)(vi) Prepare, review, and maintain	543.23(b)(2)(vi) Prepare, review, and maintain				
f	financial statements;		accurate financial statements;	accurate financial statements;				
	Prepares transactions only in accordance with	542.19(c)(3) Transactions are performed only in	14(b)(2)(vii) Prepare transactions in accordance	543.23(b)(2)(vii) Prepare transactions in				
	the appropriate authorization, as provided by	accordance with management's general and	with the appropriate authorization, as provided	accordance with the appropriate authorization,				
g	management;	specific authorization;	by management;	as provided by management;				
	Records transactions to facilitate proper	542.19(c)(4) Transactions are recorded	14(b)(2)(viii) Record transactions to facilitate	543.23(b)(2)(viii) Record transactions to facilitate				
h	recording of gaming revenue and of fees and	adequately to permit proper reporting of	proper recording of gaming revenue and fees,	proper recording of gaming revenue and fees,				
	taxes, and to maintain accountability of assets;	gaming revenue and of fees and taxes, and to	and to maintain accountability of assets;	and to maintain accountability of assets;				
	Consultation with the coloniary and the coloniary	maintain accountability of assets;				[71 14 A tribe about a second by Commission for a second by the commission for a second by the commission for a second by the commission for a second by th		
	Complies with fee calculation requirements set forth by the NIGC and the Tribal-State Compact					571.14 A tribe shall reconcile its Commission fee assessment reports,		
	as outlined in CNGC Rules & Regulations,					submitted under 25 CFR part 514, with its audited or reviewed financial statements for each location and make available such		
'	Chapter IV - C.					reconciliation upon request by the Commission's authorized		
	Chapter IV - C.					representative.		
	Compares recorded accountability for assets to	542.19(c)(5) Recorded accountability for assets is	14(b)(2)(ix) Compare recorded accountability for	543.23(b)(2)(ix) Compare recorded accountabilit	,	representative.		
	actual assets at reasonable intervals, and take	compared with actual assets at reasonable	assets to actual assets at periodic intervals, and	for assets to actual assets at periodic intervals,				
j	appropriate action with respect to any variances	intervals, and appropriate action is taken with	take appropriate action with respect to any	and take appropriate action with respect to any				
		respect to any discrepancies; and	variances;	variances;				
	Ensures functions, duties, and responsibilities	542.19(c)(6) Functions, duties, and	14(b)(2)(x) Segregate functions, duties, and	543.23(b)(2)(x) Segregate functions, duties, and				
k		responsibilities are appropriately segregated in	responsibilities;	responsibilities;				
-	sound business practices; and	accordance with sound business practices.						
	Dranarae minimum hankeall estadadana		14/b)/2)(vi) Propare minimum !!!!	E42 22(b)(2)(vi) Proposo minimum bankurl				
1	Prepares minimum bankroll calculations;		14(b)(2)(xi) Prepare minimum bankroll	543.23(b)(2)(xi) Prepare minimum bankroll calculations; and				
В	Cage Accountability.		calculations; and	Calculations, and	+			
	In addition to the standards listed in section							
	(A)(2), the cage accountability shall be reconciled							
1	to the general ledger at least monthly.							
							<u> </u>	
	At least monthly, trace the amount of cage							
2	deposits to the amounts indicated on the bank							
	statements.							
С	Credit and Accounts Receivable Trial Balance.							
	A COLUMN TO THE				<u> </u>			
	A trial balance of the the gaming operation							
	accounts receivable, including the name of the							
1	patron and current balance, shall be prepared a least monthly for active, inactive, settled or	•						
1	written-off accounts.							
	written on accounts.							
		•	•		•	·		

REF CN TICS 54 NICC Class III Guidance 543 Tribal - State Compact Other Regulations  The trial balance of gaming operation accounts ecewhole shall be reconciled to the general edger each month. The recorditation and any complete performed shall be decumented, maintained for imperation, and provided to the CNCC upon request.  At least monthly, review a sample of returned the class to determine that the required information was recorded by the cage agent(s) when the check was stabled.  At least time of time the check was stabled.  At least time of time the required information was recorded by the cage agent(s) when the check was stabled.  At least recording time time the check was cabled.  At least recording time time time the complete control of the cage creat, and collections functions must perform the following review.  B select a sample of line of credit accounts.  According compliance with credit limits and other stabilished credit issuance procedures;  C executed least procedure control of the accounts on the accounts of the account on the accounts on the accounts on the accounts of the account on the accounts on the account on the accounts of the account of the account on the account of the account of the		Recommended Revisions
The trial balance of gaming operation accounts receivable shall be reconciled to the general sedger each month. The reconciliation and any to tollow-up performed shall be documented.  animalizated for inspection, and provided to the CNGC upon request.  At least monthly, review a sample of returned checks to determine that the required information was recorded by the cage agent(s) when the check was cashed.  At least three (3) times per year, an agent independent of the cage, credit, and collections functions must perform the following review:  a Select a sample of line of credit accounts:  Ascertain compliance with reself timits and other established credit issuance procedures;  Reconcile outstanding balances of both active and instructive finances and extrements) accounts on the accounts extended to the physical instruments. This procedure need only be performed once per year for inactive finances.  Earning line of credit records to determine that be profited to the care only on the performed once per year for inactive screening.  Evaluation of the procedure of the counts of t		
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Tollow-up performed shall be documented,   maintained for inspection, and provided to the CNGC upon request.		
maintained for inspection, and provided to the CNGC upon request.  At least monthly, review a sample of returned checks to determine that the required information was recorded by the cage agent(s) when the check was caped, an agent information was recorded by the cage agent(s) when the check was caped.  At least three (s) times per year, an agent information was referred to the cage, credit, and collections functions must perform the following review:  a Select a sample of line of credit accounts: Ascertain compliance with credit timits and other established credit issuance procedures;  Beconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts on the accounts on the accounts on the accounts of the control of the		
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when the check was cashed  At least three (3) times per year, an agent independent of the cage, credit, and collections functions must perform the following review:  a Select a sample of line of credit accounts;  Ascertain compliance with credit limits and other established credit issuance procedures;  Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts  c receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
At least three (3) times per year, an agent independent of the cage, credit, and collections functions must perform the following review:  a Select a sample of line of credit accounts;  Ascertain compliance with credit limits and other established credit issuance procedures;  Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts or the accounts or the accounts or the accounts or the accounts or the accounts and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
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Ascertain compliance with credit limits and other established credit issuance procedures;  Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
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Beconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts or the accounts  receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
Reconcile outstanding balances of both active and inactive (includes write-offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
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settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
physical instruments. This procedure need only be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
be performed once per year for inactive accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
accounts:  Examine line of credit records to determine that appropriate collection efforts are being made		
Examine line of credit records to determine that appropriate collection efforts are being made		
d appropriate collection efforts are being made		
and payments are being properly recorded, and		
For at least five (5) days during the review period		
or a minimum of five (5) days per month,		
subsequently reconcile partial payment receipts		
to the total payments recorded by the cage for		
the day and account for the receipts numerically.		
the day and account for the receipts numericany.		
At least monthly, perform an evaluation of the		
5 collection percentage of credit issued to identify		
unusual trends.		
All cage and credit accounting procedures and		
any follow-up performed shall be documented		
D maintained for inspection, and provided to the		
CNGC upon request.		
When establishing SICS, the gaming operation 14(a) Conflicts of standards. When establishing 543.23(a) Conflicts of standards. When		
should review, and consider incorporating, other  SICS, the gaming operation should review, and establishing SICS, the gaming operation should		
external standards such as GAAP, GAAS, and consider incorporating, other external standards review, and consider incorporating, other		
standards promulgated by GASB and FASB. In such as GAAP, GAAS, and standards external standards such as GAAP, GAAS, and		
the event of a conflict between the MICS/TICS promulgated by GASB and FASB. In the event of standards promulgated by GASB and FASB. In		
and the incorporated external standards, the a conflict between the MICS and the the event of a conflict between the MICS and		
external standards prevail. incorporated external standards, the external the incorporated external standards, the external		
standards prevail. standards prevail.		
19.3 Chart of Accounts.		
On at least a quarterly basis, the operation shall 4 CNCA 43(D) The Gaming Commission shall promulgate regulati	ons	
submit a uniform Chart of Accounts and fiscal audits of all gaming activities open	ted	
accounting classifications, to ensure consistency, by the Nation. At a minimum, those regulations shall: (D) Ensure	nat	
comparability, and effective disclosure of an adequate accounting system and uniform code of accounts are	d	
A financial information. accounting classifications are in place to assure consistency,		
comparability, and effective disclosure of financial information; ar	d	
(E) Require intervals at which such information shall be furnished.		

REF	CN TICS	542	NIGC Class III Guidance	543 Tribal - State Co	mpact Other Regulations	Recommended Revisions
	Section 19 - Accounting	3.5	BULLETIN 2018-3		The Regulations	
В	The quarterly submission shall include all accounts related to the gaming financial statements and shall categorize each account as active/inactive, as well as identify all new/added accounts.				4 CNCA 43(D) The Gaming Commission shall promulgate regulations for internal controls and fiscal audits of all gaming activities operated by the Nation. At a minimum, those regulations shall: (D) Ensure that an adequate accounting system and uniform code of accounts and accounting classifications are in place to assure consistency, comparability, and effective disclosure of financial information; and (E) Require intervals at which such information shall be furnished.	
С	The Chart of Accounts shall include all information necessary to trace account balances to the corresponding financial statements (line items).				4 CNCA 43(D) The Gaming Commission shall promulgate regulations for internal controls and fiscal audits of all gaming activities operated by the Nation. At a minimum, those regulations shall: (D) Ensure that an adequate accounting system and uniform code of accounts and accounting classifications are in place to assure consistency, comparability, and effective disclosure of financial information; and (E) Require intervals at which such information shall be furnished.	
19.4	Reporting Requirements.				4 CNCA 43(D) The Gaming Commission shall promulgate regulations for internal controls and fiscal audits of all gaming activities operated by the Nation. At a minimum, those regulations shall: (B) Require reporting requirements to the Gaming Commission.	
А	The operation shall present unaudited financial statements to the CNGC on a monthly basis.				4 CNCA 43(D) The Gaming Commission shall promulgate regulations for internal controls and fiscal audits of all gaming activities operated by the Nation. At a minimum, those regulations shall: (B) Require reporting requirements to the Gaming Commission.	
19.5	Gross Gaming Revenue Computation Standards.	542.19(d) Gross gaming revenue computations.				
А	Gross gaming revenue is the difference between gaming wins and losses before deducting costs and expenses or deducting incentives or adjusting for changes in progressive jackpot liability accruals. Generally, the difference between patron wagers and the payouts made on winning wagers. Formulas for computing such revenue vary depending on the game type.				NIGC Bulletin 2003-4 expanded definition to incorporate AICPA's Audit and Accounting Guide for Gaming.	
В	For gaming machines, gross revenue equals drop, less fills, jackpot payouts and personal property awarded to customers as gaming winnings. Additionally, the initial hopper load is not a fill and does not affect gross revenue. The difference between the initial hopper load and the total amount that is in the hopper at the end of the gaming operation's fiscal year should be adjusted accordingly as an addition to or subtraction from the drop for the year.	hopper load is not a fill and does not affect gross revenue. The difference between the initial hopper load and the total amount that is				
1	If the casino pays a percentage of the revenue generated by participating gaming machines to equipment distributors or manufacturers for use of the machines, the deduction of such payments from the amount wagered is not permitted. The total win should be recorded as revenue and the participating distribution should be recognized as an operating expense.				NIGC Bulletin 2003-4, Operating Lease Payments. In some operations, the casino pays a percentage of the revenue generated by participating gaming machines to equipment distributors or manufacturers for use of the machines. The deduction of such payments from the amount wagered is not permitted. The total win should be recorded as revenue and the participating distribution should be recognized as an operating expense.	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Regulations	Recommended Revisions
11.	Section 19 - Accounting	512	BULLETIN 2018-3	343	Tribut State compact	Other Regulations	Recommended Revisions
	Cash-out tickets/vouchers issued at the gaming		20111111 2010 3				
	machine or gaming device shall be deducted						
	from gross revenue as jackpot payouts in the						
	month the tickets are issued by the gaming						
	machine or gaming device. Tickets deducted						
	from gross revenue that are not redeemed						
2	within a period, not to exceed one hundred						
	eighty (180) days of issuance, shall be included						
	in gross revenue. An unredeemed ticket						
	previously included in gross revenue may be						
	deducated from gross revenue in the month						
	redeemed.						
	i caccinica.						
	In computing gross revenue for gaming 542.19(d)(4)	(ii) In computing gross revenue for					
	machines, keno and bingo, the actual cost to the gaming machines.	chines, keno and bingo, the actual					
	gaming operation of any personal property cost to the g	gaming operation of any personal					
	distributed as losses to customers may be property dis	tributed as losses to patrons may be					
С		om winnings (other than costs of					
_	travel, lodging, services, food, and beverages), if travel, lodging	ng, services, food, and beverages), if					
	the operation maintains detailed documents the gaming	operation maintains detailed					
	supporting the deduction. documents	supporting the deduction.					
	5 1 5 10 10 10 10						
D		For each counter game, gross					
	revenue equ	(i) The money accepted by the					
	, , , , , , , , , , , , , , , , , , , ,						
		eration on events or games that g the month or will occur in					
1	· ·						
-	(advance sales), less money paid out during the subsequent						
	month to customers on winning wagers (cash basis); or, the month to basis"); or	o patrons on winning wagers ("cash					
	Dasis), Oi,						
	The money accepted by the gaming operation 542.19(d)(3)	(ii) The money accepted by the					
		eration on events or games that					
		g the month, plus money, not					
	gross revenue, that was accepted by the gaming previously in						
2		the gaming operation in previous					
	games occurring in the month, less money paid months on e	* * '					
	out during the month to customers as winning month, less	_					
		s winning wagers ("modified accrual					
	basis")						
		For each card game and any other				NIGC Bulletin 2003-4, Other Compensation. For card games,	
		ich the gaming operation is not a				tournaments and any other games in which the casino is not a party	
		ager, gross revenue equals all				to a wager, gross gaming revenue shall include all money received as	
	house banked games), gross revenue equals all money recei					compensation for conducting the game, i.e. rake, commissions, entry	
E		on for conducting the game.				fees, and admission fees.	
	compensation for conducting the game (i.e.						
	rake, ante, commissions, entry fee, and						
	admission fees).						
	A service and service about the state of the servic	(i) Ai					
1	A gaming operation shall not include either shill 542.19(d)(4)						
1		er shill win or loss in gross revenue					
	computation	115.					

REF	CN TICS	542	NICC Class III Collans	F42	Tribal - State Compact	O4h Pl-4i	Recommended Revisions
KEF	Section 19 - Accounting	542	NIGC Class III Guidance BULLETIN 2018-3	543	Tribai - State Compact	Other Regulations	Recommended Revisions
		542.19(f) If the gaming operation provides	BULLETIN 2010-3				
		1					
	satisfy a payout resulting from a wager, the	periodic payments to satisfy a payout resulting					
	initial installment plan, when paid, and the actual	1					
	cost of a payment plan, which is funded by the	1					
	operation, may be deducted from winnings. The						
	operation is required to obtain the approval of	may be deducted from winnings. The gaming					
	all payment plans from the CNGC. For any	operation is required to obtain the approval of					
	funding method which merely guarantees the	all payment plans from the TGRA. For any					
F	gaming operation's performance, and under	funding method which merely guarantees the					
	which the operation makes payments out of	gaming operation's performance, and under					
	cash flow (e.g. irrevocable letters of credits,	which the gaming operation makes payments					
	surety bonds, or other similar methods), the	out of cash flow (e.g. irrevocable letters of					
	operation may only deduct such payments when	1					
	paid to the customer.	the gaming operation may only deduct such					
	paid to the editorner.	payments when paid to the patron. (Adopted					
		1					
		May 11, 2006)					
	For payouts by inter-casino linked systems,	542.19(g) For payouts by wide-area progressive				NIGC Bulletin 2003-4, Inter-Casino Linked Systems (includes Wide	
	including wide-area progressive gaming	gaming machine systems, a gaming operation				Area Progressive Systems). A gaming operation may deduct from	
	machine systems, a gaming operation may	may deduct from winnings only its pro rata				winnings only its pro-rata share of inter-casino linked system payouts.	
G	deduct from winnings only its pro rata share of a	, , , ,				It is not permissible to deduct amounts to cover payments of fees,	
		payout. (Adopted May 11, 2006)				costs, or expenses associated with, or attributable to, adminstrating	
	wide-area gaming machine system payout.	payout. (Adopted May 11, 2006)					
						the inter-casino system, or similar such enterprise.	
	Cash-out tickets issued at a gaming machine or	542 19(h) Cash-out tickets issued at a gaming					
	gaming device shall be deducted from gross	machine or gaming device shall be deducted					
		1					
	revenue as jackpot payouts in the month the	from gross revenue as jackpot payouts in the					
	tickets are issued by the gaming machine or	month the tickets are issued by the gaming					
	gaming device. Tickets deducted from gross	machine or gaming device. Tickets deducted					
	revenue that are not redeemed within a period,	from gross revenue that are not redeemed					
Н	not to exceed one hundred eighty (180) days of	within a period, not to exceed 180 days of					
	issuance, shall be included in gross revenue. An	issuance, shall be included in gross revenue. An					
	unredeemed ticket previously included in gross	unredeemed ticket previously included in gross					
		revenue may be deducted from gross revenue in					
	the month redeemed.	the month redeemed.					
	and month readermed.	and monar redecimed.					
	A gaming operation may not deduct from gross	542.19(i) A gaming operation may not deduct					
	revenues the unpaid balance of a credit	from gross revenues the unpaid balance of a					
1	instrument extended for purposes other than	credit instrument extended for purposes other					
	gaming.	than gaming.					
	A gaming operation may deduct from gross	542.19(j) A gaming operation may deduct from					
1	revenue the unpaid balance of a credit	gross revenue the unpaid balance of a credit					
1	•	instrument if the gaming operation documents,					
		or otherwise keeps detailed records of,					
1	or otherwise keeps detailed records of,						
,	compliance with the following requirements.	compliance with the following requirements.					
	Such records confirming compliance shall be	Such records confirming compliance shall be					
	made available to the CNGC or the NIGC upon	made available to the TGRA or the Commission					
	request:	upon request:					
	The coming energies are de 1900 et	E42 10(i)(1)The general and a second in the					
4	3 3 .	542.19(j)(1)The gaming operation can document					
1	credit extended was for gaming purposes;	that the credit extended was for gaming					
		purposes;					
	The gaming operation has established	542.19(j)(2) The gaming operation has					
	procedures and relevant criteria to evaluate a	established procedures and relevant criteria to					
	patron's credit reputation or financial resources	evaluate a patron's credit reputation or financial					
2	and to then determine that there is a reasonable	resources and to then determine that there is a					
	basis for extending credit in the amount or sum						
	_	amount or sum placed at the patron's disposal;					
	the contract of the contract of the country						

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Pegulations	Recommended Revisions
ILLI	Section 19 - Accounting	J42	BULLETIN 2018-3	343	Tribal - State Compact	Other Regulations	Recommended Revisions
3	In the case of personal checks, the gaming operation has established procedures to examine documentation, which would normally be acceptable as a type of identification when cashing checks, and has recorded the patron's bank check guarantee card number or credit card number, or has satisfied paragraph (I)(2) of this section, as management may deem appropriate for the check-cashing authorization granted;	542.19(j)(3) In the case of personal checks, the gaming operation has established procedures to examine documentation, which would normally be acceptable as a type of identification when cashing checks, and has recorded the patron's bank check guarantee card number or credit card number, or has satisfied paragraph (j)(2) of this section, as management may deem appropriate for the check-cashing authorization granted;					
4	In the case of third-party checks for which cash, chips, or tokens have been issued to the patron, or which were accepted in payment of another credit instrument, the gaming operation has established procedures to examine documentation, normally accepted as a means of identification when cashing checks, and has, for the check's maker or drawer, satisfied paragraph (I)(2) of this section, as management may deem appropriate for the check-cashing authorization granted;	s42.19()(4) In the case of third-party checks for which cash, chips, or tokens have been issued to the patron, or which were accepted in payment of another credit instrument, the gaming operation has established procedures to examine documentation, normally accepted as a means of identification when cashing checks, and has, for the check's maker or drawer, satisfied paragraph (j)(2) of this section, as management may deem appropriate for the check-cashing authorization granted;					
5	In the case of guaranteed drafts, procedures should be established to ensure compliance with the issuance and acceptance procedures prescribed by the issuer;	542.19(j)(5) In the case of guaranteed drafts, procedures should be established to ensure compliance with the issuance and acceptance procedures prescribed by the issuer;					
6	The gaming operation has established procedures to ensure that the credit extended is appropriately documented, not least of which would be the patron's identification and signature attesting to the authenticity of the individual credit transactions. The authorizing signature shall be obtained at the time credit is extended.	542.19(j)(6) The gaming operation has established procedures to ensure that the credit extended is appropriately documented, not least of which would be the patron's identification and signature attesting to the authenticity of the individual credit transactions. The authorizing signature shall be obtained at the time credit is extended.					
7		542.19(j)(7) The gaming operation has established procedures to effectively document its attempt to collect the full amount of the debt. Such documentation would include, but not be limited to, letters sent to the patron, logs of personal or telephone conversations, proof of presentation of the credit instrument to the patron's bank for collection, settlement agreements, or other documents which demonstrate that the gaming operation has made a good faith attempt to collect the full amount of the debt. Such records documenting collection efforts shall be made available to the TGRA or the commission upon request.					
К	The amounts paid to the State or other designated entity is a cost of doing business in that jurisdiction and not a payout or loss arising from a wagering transaction. These payments do not represent an allowable deduction from win when calculating gross gaming revenue.					NIGC Bulletin 2003-4, Tribal/State Compact Payments. The deduction of amounts paid to a State or other designated entity is a cost of doing business in that jurisdiction and not a payout or loss arising from a wagering transaction. Therefore the payments do not represent an allowable deduction from win.	

Section 2. According to the control of the control	REF	CN TICS 542	NIGC Class III Guidance	543 Tribal - State Compact	Other Regulations	Recommended Revisions
Consideration of the control of the					<b>3</b>	
Section of the content of group agent and the content of the conte		-			NIGC Bulletin 2003-4, Promotional Allowances. Casino	
Secretary and the company of the com						
Exception of the control of the cont					· · ·	
* South and find any experimental of the find of the company of th		of gross gaming revenue. However, this amount			computation of gross gaming revenue.	
For the first of the control of the	L	may be included in gross revenues and offset by				
The contract of the contract o		deducting it from gross revenues on the face of			The retail amount of promotional allowances is often disclosed in the	
Some content of the		the income statement			financial statements, preferably, in the financial statement notes.	
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Section   The content of the Content   Conte						
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popular fay the continue is any other invoices. The production of the continue			571.7(a) A gaming operation shall keep	Part 5(C) Records. In addition to other records	4 CNCA 43 The Gaming Commission shall promulgate regulations for	
specifically recoursed as applicable in parameter or recenter, used and the recommendation of production of the Campanation production of the Campanation of the Camp		accounting records and financial statements and the Tribal internal control standards;	permanent books of account or records,	required to be maintained herein, the enterprise	internal controls and fiscal audits of all gaming activities operated by	
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subtractive and made solitable for injunction by the CMCC. He MCC. #400 for the MCC.				<b>'</b>	performed as it relates to the requirements of this section, and;	
the CNCC Net NIGOL and other SCA (as upplicated for covered general).  All books, records, and documents required by this section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section shall be relative to grow the section of the sectio	Α					
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this section shall be retained by a garning operation in accordance with the following schedule. A record that summarizes transactions is sufficient, provided that all concents to containing an original signature(s) affecting the exacutation are independently presented by the Commission or authorized to the exacutation are independently presented. Original books, records and documents containing an original signature(s) affecting to the exacutation are independently presented. Original books, records and documents containing an original product of the exacutation are independently presented. Original books, records and some personal presentation or personal prese						
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sufficient, provided that all locuments sufficient, provided that all locuments combining an original signature(s) attenting to the accuracy of a related transaction are independently presented. Original books, records or documents standard to include copes of originals, except for the copies that contain original comments or motions or parts of multi- graming operation for a minimum of live (5) years.  1 Casino Cappt/Neult documents  2 Syspect records from all segering circles and suggesting schedules or suggesting the calculation or displaced powers or parts of multi- specific parts  2 Occumentation supporting the calculation or of specific parts  2 Occumentation supporting the calculation or of specific parts  3 Occumentation supporting the calculation or of specific parts  4 Seport records from all segering circles and supporting the calculation or of specific parts  4 Seport records from all segering calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of specific parts  5 Occumentation supporting the calculation or of spec		this section shall be retained by a gaming documents pertaining to the conduct of	section shall be kept at all times available for		internal controls and fiscal audits of all gaming activities operated by	
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containing an original signatury(s) attesting to the accuracy of a related transaction are independently preserved. Original books, records, and documents containing an original signatury(s) attesting to the accuracy of a gaming related attesting to the course of a containing an original spinatury of an analysis and original spokes, records and documents shall be retained by a gaming operation for a minimum of five (5) years:  2		schedule. A record that summarizes transactions operation in accordance with the following				
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Independently preserved. Original books, or documents shall not include copies that contain original comments or notations or parts of midependently preserved. Originals except for the copies that contain original comments or notations or parts of midependently preserved. Originals except for the copies that contain original comments or notations or parts of mill-part forms. The following original books, records or documents shall not original posteriors for a minimum of five (5) years:    Product records and documents shall be retained by the garming operation for a minimum of five (5) years:   Product records from all wagering activities.						
Pecoris, or documents shall not include copies to contain or ginal comments or notations or parts of multi-part forms. The following original books, records, and documents shall be retained by againing operation for a minimum of five (5) years:    Casino Cagy/Valit documents:   S42_19(X)(1)() Casino cage documents;   S42_19(X)(1)() Casino cage documents;   S42_19(X)(1)() Documentation supporting the calculation of table game win:						
econds, of contents as an include copies that contain of originals, except for the copies that contain of original comments or notations or parts of multi-include copies of originals, except for copies part towns. The following original books, records and documents shall be retained by the gaming operation for a minimum of five (5) years:  1 Casino Cage/Vault documents  Poyout records from all wagering activities.  2 Documentation supporting the calculation of table game win;  Documentation supporting the calculation of supporting the calculation of stable game win;  Documentation supporting the calculation of supporting the calculation of stable game win;  Documentation supporting the calculation of supporting the calculation of stable game win;  Documentation supporting the calculation of supporting the calculation of stable game win;  Documentation supporting the calculation of stable game win;  Documentation supporting the calculation of stable game win;  Documentation supporting the calculation of stable game win;  Documentation supporting the calculation of stable game win;  Powout records from games of part-insulate or supporting the calculation of stable game win;  Are revenue received from games of part-insulate or supporting the calculation of stable game win;  Are revenue received from games of part-insulate or supporting the calculation of stable games wing againing activities offered by the gaming activities offered by the gaming additive surfered by games, and all other games and other sorting activities offered by greating activities offered by the gaming and games, and all other gaming activities offered by greating activities offered by the gaming and games, and all other gaming activities offered by	R					
original comments or notations or parts of multi- part forms. The following original books, records, and documents shall be retained by the gaming operation for a minimum of five (5) years:  1 Casino Cage/Yault documents; 2 Documentation supporting the calculation of table game win; 2 Documentation supporting the calculation of table game win; 3 Documentation supporting the calculation of gaming machine win; 4 Keno, bingo, card games, pul- table, and all other paring activities of the concepts of originals, except for copies of notificants, early gaming activities of the part of multi-part forms. The following original books, records and documents shall be retained by a gaming operation for a minimum of five (5) years:  1 Casino Cage/Yault documents; 2 Pary S(C)(2) Records. Payout from the conduct of all covered games;  2 Documentation supporting the calculation of table game win; calculation of Table game win; calculation of Table game win; calculation of paring machine win; Documentation supporting the calculation of gaming machine win; Calculation	D					
part forms. The following original books, records, and documents shall be retained by the gaming operation for a minimum of five (5) years:    Payout records from all wagering activities.			t			
records, and documents shall be retained by the garning operation for a minimum of five (5) by againing operation for a minimum of five (6) by againing operation for a minimum of five (6) by againing operation for a minimu						
gaming operation for a minimum of five (5) years:    Documentation supporting the calculation of table game win;   Documentation supporting the calculation of gaming machine win;   Documentation supporting the calculation of gaming machine win;   Documentation supporting the calculation of gaming and supporting the calculation of gaming machine win;   Documentation supporting the calculation of gaming and supporting the calculation of gaming and supporting the calculation of revenue received from games of pari-mutuel, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities of the part of th						
years: by a gaming operation for a minimum of five (5) years:  1 Casino Cage/Vault documents: 542.19(k)(1)(i) Casino cage documents:  2 Part 5(C)(2) Records. Payout from the conduct of all covered games;  2 Documentation supporting the calculation of table game win; calculation of table game win; calculation of sexplaining machine win; Documentation supporting the calculation of garning machine win; Documentation supporting the calculation of revenue received from games of pari-mutuel, load of revenue received from the games garning activities offered by the gaming game, and all other gaming activities offered by the gaming game, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the gaming games, and all other gaming activities offered by the games, and all other gaming activities offered by the games, and all other gaming activities offered by the games games.						
years:  1 Casino Cage/Vault documents; 542.19(k)(1)(i) Casino cage documents; Part 5(C)(2) Records. Payout from the conduct of all covered games;  2 Documentation supporting the calculation of table game win; calculation of table game win; standard gaming machine win; calculation of revenue received from games of pari-mutuel, keno, bingo, card games, and all other gaming activities offered by the gaming gars, and all other gaming activites offered by games, and all other games, and all other games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the gaming garchine games, and all other gaming activites offered by the games games, and all other gaming activites offered by the games games games, and all other gaming activities offered by the games games games, and all other games games, and all other gaming activities offered by the games games games, and all other gaming activities offered by the games games games, and all other gaming activities offered by the games games games, and all other games games, and all other games games, and all other games games, and all other games games games games, and games game		· · ·				
2 Documentation supporting the calculation of table game win; 2 Documentation supporting the calculation of gaming machine win; 2 Documentation supporting the calculation of gaming machine win; 2 Documentation supporting the calculation of gaming machine win; 3 Documentation supporting the calculation of gaming machine win; 4 keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities			(9)			
Part 5(C)(2) Records. Payout from the conduct of all covered games;  Documentation supporting the calculation of table game win;  Documentation supporting the calculation of gaming machine win;  Documentation supporting the calculation of gaming machine win;  Documentation supporting the calculation of gaming machine win;  Documentation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by the gaming activities offered by		,				
2 Documentation supporting the calculation of table game win; calculation of garning machine win; calculation of garning machine win; calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other garning activities offered by the garning garning activities offered by the garning garning activities offered by the garning garning activities offered by the garning garning activities offered by the gar	1		+	D : 5(0/0) D : 1 D : ( : 1 : 1 : 1		
2 Documentation supporting the calculation of table game win; calculation of table game win; supporting the calculation of table game win; supporting the calculation of gaming machine win; support		Payout records from all wagering activities;				
table game win; calculation of table game win;  Documentation supporting the calculation of gaming machine win; calculation of gaming machine win;  Documentation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities offered by the gaming agames, and all other gaming activities offered by the gaming activities offered by the gaming activities offered by	2			all covered games;		
table game win; calculation of table game win;  Documentation supporting the calculation of gaming machine win; calculation of gaming machine win;  Documentation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities offered by the gaming agames, and all other gaming activities offered by the gaming activities offered by the gaming activities offered by						
table game win; calculation of table game win;  Documentation supporting the calculation of gaming machine win; calculation of gaming machine win;  Documentation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming activities offered by the gaming agames, and all other gaming activities offered by the gaming activities offered by the gaming activities offered by		Documentation supporting the calculation of 542 19(k)(1)(ii) Documentation supporting the	+			
Documentation supporting the calculation of gaming machine win;  Documentation supporting the calculation of gaming machine win;  Documentation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming  A bocumentation supporting the calculation supporting the calculation of gaming machine win;  542.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  542.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  542.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  542.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  542.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gaming machine win;  642.19(k)(1)(iii) Documentation supporting the calculation of gami	2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
gaming machine win; calculation of gaming machine win; calculation of gaming machine win; calculation supporting the calculation of revenue received from games of pari-mutuel, keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gamin	_					
Documentation supporting the calculation of revenue received from games of pari-mutuel, 4 keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming  Sequence of the calculation of sevenue received from the games of keno, pari-mutuel, bingo, pull-tabs, card games, and all other gaming activities offered by the gaming	3	11 -				
revenue received from games of pari-mutuel, 4 keno, bingo, card games, pull-tabs, and all other gaming activities offered by the gaming gaming activities offered by the gaming  calculation of revenue received from the games of keno, pari-mutuel, bingo, pull-tabs, card games, and all other gaming activities offered by						
gaming activities offered by the gaming games, and all other gaming activities offered by						
	4					
		gaming activities offered by the gaming games, and all other gaming activities offered	by			
			1			1

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Other Regulations	Recommended Revisions
	Section 19 - Accounting		BULLETIN 2018-3				
	Documentation supporting the write-off of	542.19(k)(1)(ix) Documentation supporting the					
5	approved credit instruments;	write-off of gaming credit instruments and					
		named credit instruments;					
			571.7(b) The Commission may require a gaming				
			operation to submit statements, reports, or				
			accountings, or keep specific records, that will				
			enable the Commission to determine whether or				
6			not such operations: (1) Is liable for fees payable				
· ·			to the Commission and in what amount; and (2)				
			Has properly and completely accounted for all				
			transactions and other matters monitored by the				
			Commission.				
	All other books, records and documents	542.19(k)(1)(x) All other books, records and					
	pertaining to the conduct of wagering activities	. 3					
7	that contain original signature(s) attesting to t						
	accuracy of the gaming related transaction.	signature(s) attesting to the accuracy of the					
		gaming related transaction.					
		r 542.19(k)(2) Unless otherwise specified in this					
		ed part, all other books, records, and documents					
С	until such time as the accounting records have						
	been audited by the gaming operation's	accounting records have been audited by the					
	independent certified public accountants.	gaming operation's independent certified public					
		accountants.					
	The above requirements shall apply without	542.19(k)(3) The above definition shall apply					
	regards to the medium by which the book,	without regards to the medium by which the					
D	record, or document is generated or maintaine						
	(paper, computer- generated, magnetic media						
	etc.).	magnetic media, etc.).					

		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3		·		
Gei	eneral Information Technology (IT) Standards						
The	ne IT department shall adhere to all standards located						
thro	roughout this document, which may or may not be						
refe	ferenced in this Section. Standards in this section shall						
app	pply to each applicable department within the gaming						
	peration.						
	s used in this section only, a system is any		As used in this section only, a system is any	As used in this section only, a system is any			
	emputerized system that is related to the gaming		computerized system that is integral to the gaming	computerized system that is integral to the			
env	ovironment. This includes, but is not limited to, the		environment. This includes, but is not limited to, the	gaming environment. This includes, but is			
	rver and peripherals for gaming systems, accounting,		server and peripherals for gaming system, accounting,	not limited to, the server and peripherals for			
sur	rveillance, essential phone system, and door access		surveillance, essential phone system, and door access	Class II gaming system, accounting,			
and	nd warning systems.		and warning systems. §11(b)	surveillance, essential phone system, and			
				door access and warning systems. 543.20(b)			
Sur	pervision. Controls must identify the supervisory agent		Supervision. §11(a)	Supervision. Controls must identify the	Supervisory Line of Authority. The enterprise shall		Supervision. Controls must identify the
	the department or area responsible for ensuring that		Controls must identify the supervisory agent in the	supervisory agent in the department or area	provide the TCA and SCA with a chart of the		supervisory agent in the department or area
	e department or area is operating in accordance with		department or area responsible for ensuring that the	responsible for ensuring that the	supervisory lines of authority with respect to those		responsible for ensuring that the department or
	tablished policies and procedures. The supervisory		department or area is operating in accordance with	department or area is operating in	directly responsible for the conduct of covered		area is operating in accordance with established
	gent must be independent of the operation of gaming		established policies and procedures. §11(a)(1)	accordance with established policies and	games, and shall promptly notify those agencies of		policies and procedures. The supervisory agent
_	achines.		The supervisory agent must be independent of the	procedures. The supervisory agent must be	any material changes thereto. 5(H)		must be independent of the operation of gaming
			operation of the gaming activity. §11(a)(2)	independent of the operation of class II	any material energies are easily		activity machines.
				games.			
Cor	ontrols must ensure that duties are adequately		Controls must ensure that duties are adequately	Controls must ensure that duties are			
seg	gregated and monitored to detect procedural errors		segregated and monitored to detect procedural errors	adequately segregated and monitored to			
_	nd to prevent the concealment of fraud.		and to prevent the concealment of fraud. §11(a)(3)	detect procedural errors and to prevent the			
	·			concealment of fraud. 543.20(a)(3)			
	formation technology agents having access to gaming		Information technology agents having access to	Information technology agents having			
	stems may not have signatory authority over financial		gaming systems may not have signatory authority	access to class II games may not have			
	struments and payout forms and must be independent		over financial instruments and payout forms and must	signatory authority over financial			
of a	and restricted from access to:		be independent of and restricted from access to:	instruments and payout forms and must be			
			§11(a)(4)	independent of and restricted from access			
Fin	nancial instruments;		Financial instruments; §11(a)(4)(i)	to: 543.20(a)(4) Financial instruments; 543.20(a)(4)(i)			
_	counting, audit, and ledger entries; and		Accounting, audit, and ledger entries; and \$11(a)(4)(ii)	Accounting, audit, and ledger entries; and			
7.00	secontaing, addity and reager entries, and		recounting, addit, and reager entires, and 322(a)(1)(ii)	543.20(a)(4)(ii)			
Pay	yout forms.		Payout forms. §11(a)(4)(iii)	Payout forms. 543.20(a)(4)(iii)			
	nysical and Logical Security		(d) Physical security.				
The	ne information technology environment and		The information technology environment and	The information technology environment			
infr	frastructure must be maintained in a secured physical		infrastructure must be maintained in a secured	and infrastructure must be maintained in a			
loca	cation such that access is restricted to authorized		physical location such that access is restricted to	secured physical location such that access is			
age	gents only.		authorized agents only. §11(d)(1)	restricted to authorized agents only.			
				543.20(d)(1)			
				542 20(-) Cl "		-	Consider a section of the latest and
				543.20(c) Class II gaming systems' physical			Gaming systems' physical and logical controls.
				and logical controls. Controls must be		В	Controls must be eatablished and procedures
				eatablished and procedures implemented to			implemented to ensure adequate:
+				ensure adequate: 543.20(c)(1) Control of physical and logical			Control of physical and logical access to the
				access to the information technology			information technology environment, including
				environment, including accounting, voucher,			accounting, voucher, cashless and player tracking
				cashless and player tracking systems,		1	systems, among others used in conjunction with
				among otheres used in conjunction with			
				-		1	gaming;
				Class II gailing,			
				Class II gaming;			

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3				
				543.20(c)(2) Physical and logical protection			Physical and logical protection of storage media
				of storage media and its contents, including		2	and its contents, including recovery procedures;
				recovery procedures;			
				Access credential control methods;		3	Access credential control methods;
				543.20(c)(4) Record keeping and audit		3	Record keeping and audit processes; and
				processes; and		4	Record Reeping and addit processes, and
				543.20(c)(5) Departmental independence,			Departmental independence, including, but not
				including, but not limited to, means to			limited to, means to restrict agents that have
				restrict agents that have access to		_	access to information technology from having
				information technology from having access		5	access to financial instruments.
				to financial instruments.			
	Network communication equipment must be physically		Network Communication Equipment must be	Network communication equipment must			
В	secured from unauthorized access.		physically secured from unauthorized access. §11(d)(4)	be physically secured from unauthorized			
			. , , ,	access. 543.20(d)(4)			
	Access devices to the systems' secured physical location,		Access devices to the systems' secured physical	Access devices to the systems' secured			
_	such as keys, cards, or fobs, must be controlled by an		location, such as keys, cards, or fobs, must be	physical location, such as keys, cards, or			
	independent agent.		controlled by an independent agent. §11(d)(2)	fobs, must be controlled by an independent			
				agent. 543.20(d)(2)			
	Access to the systems' secured physical location must be		Access to the systems' secured physical location must	Access to the systems' secured physical			
	restricted to agents in accordance with established		be restricted to agents in accordance with established	location must be restricted to agents in			
	policies and procedures, which must include maintaining		policies and procedures, which must include	accordance with established policies and			
D	and updating a record of agents granted access		maintaining and updating a record of agents granted	procedures, which must include maintaining			
	privileges.		access privileges. §11(d)(3)	and updating a record of agents granted			
				access privileges. 543.20(d)(3)			
	Logical security. Controls must be established and		Logical security. Controls must be established and	Logical security. Controls must be			
	procedures implemented to protect all systems and to		procedures implemented to protect all systems and to	established and procedures implemented to			
	ensure that access to the following is restricted and		ensure that access to the following is restricted and	protect all systems and to ensure that			
E	secured:		secured: §11(e)(1)	access to the following is restricted and			
				secured: 543.20(e)(1)			
	Costs and a of the same and a series and		Costonel officers or development	Contained authorized and the contained at the contained authorized at the contained at the			
1	Systems' software and application programs;		Systems' software and application programs;	Systems' software and application			
	Data associated with gaming machines; and		\$11(e)(1)(i)  Data associated with gaming; and \$11(e)(1)(ii)	programs; 543.20(e)(1)(i)  Data associated with Class II gaming; and			
2	5 5		5 5	543.20(e)(1)(ii)			
	Communications facilities, systems, and information		Communications facilities, systems, and information	Communications facilities, systems, and			
3	transmissions associated with gaming systems.		transmissions associated with gaming systems.	information transmissions associated with			
			§11(e)(1)(iii)	Class II gaming systems. 543.20(e)(1)(iii)			
	Unused services and non-essential ports must be		Unused services and non-essential ports must be	Unused services and non-essential ports			
4	disabled whenever possible.		disabled whenever possible. §11(e)(2)	must be disabled whenever possible.			
	Procedures must be implemented to ensure that all		Procedures must be implemented to ensure that all	543.20(e)(2) Procedures must be implemented to ensure	Records. In addition to other records required to		
	activity performed on systems is restricted and secured		activity performed on systems is restricted and	that all activity performed on systems is	be maintained herein, the enterprise or tribe shall		
	from unauthorized access, and logged.		secured from unauthorized access, and logged.	restricted and secured from unauthorized	maintain the following records related to		
			§11(e)(3)	access, and logged. 543.20(e)(3)	implementation of this compact in permanent		
				, 55	form and as written or entered, whether manually		
5					or by computer, and which shall be maintained by		
)					the enterprise and made available for inspection by	,	
					the SCA for no less than three (3) years from the		
					date generated: 3. Maintenance logs for all		
					covered games gaming equipment used by the		
					enterprise. Part 5(C)(3)		
					enterprise. Part 5(C)(3)		

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3				
	Communications to and from systems via Network		Communications to and from systems via Network	Communications to and from systems via			
6	Communication Equipment must be logically secured		Communication Equipment must be logically secured	Network Communication Equipment must			
	from unauthorized access.		from unauthorized access. §11(e)(4)	be logically secured from unauthorized			
20.2				access. 543.20(e)(4)			
20.3	Installations and/or Modifications Only CNGC authorized or approved systems and		(g) Installations and/or modifications.  Only TGRA authorized or approved systems and	Only TGRA authorized or approved systems			
Δ	modifications may be installed.		modifications may be installed. \$11(g)(1)	and modifications may be installed.			
^	iniounications may be installed.		inodifications may be installed. \$11(g)(1)	543.20(g)(1)			
	Records must be kept of all new installations and/or		Records must be kept of all new installations and/or	Records must be kept of all new			Records must be kept of all new installations
	modifications to Class II gaming systems. These records		modifications to gaming systems. These records must	•			and/or modifications to Class II gaming systems.
В	must include, at a minimum:		include, at a minimum: §11(g)(2)	gaming systems. These records must			These records must include, at a minimum:
	, in the second		J. J.	include, at a minimum: 543.20(g)(2)			·
1	The date of the installation or modification;		The date of the installation or modification; §11(g)(2)(i	) The date of the installation or modification;			
				543.20(g)(2)(i)			
	The nature of the installation or change such as new		The nature of the installation or change such as new	The nature of the installation or change			
2	software, server repair, significant configuration		software, server repair, significant configuration	such as new software, server repair,			
	modifications;		modifications; §11(g)(2)(ii)	significant configuration modifications;			
	Friday and front and the state of the state		Friday of wife stay should be in stall stay on the	543.20(q)(2)(ii)			
2	Evidence of verification that the installation or the		Evidence of verification that the installation or the	Evidence of verification that the installation			
3	modifications are approved; and		modifications are approved; and §11(g)(2)(iii)	or the modifications are approved; and			
	The identity of the agent(s) performing the		The identity of the agent(s) performing the	543.20(g)(2)(iii)  The identity of the agent(s) performing the			
4	installation/modification.		installation/modification. §11(g)(2)(iv)	installation/modification. 543.20(g)(2)(iv)			
•	installation, modification.		installation/modification. 311(g)(2)(iv)	installation/modification. 545.20(g)(2)(iv)			
	Documentation must be maintained, such as manuals		Documentation must be maintained, such as manuals	Documentation must be maintained, such			
	and user guides, describing the systems in use and the		and user guides, describing the systems in use and the				
5	operation, including hardware.		operation, including hardware. §11(g)(3)	systems in use and the operation, including			
				hardware. 543.20(g)(3)			
С	Software Downloads/Verification						
	Downloads for Class II gaming systems, either automatic		Software downloads. Downloads, either automatic or	Software downloads. Downloads, either			
1	or manual, must be performed in accordance with 25		manual, must be performed in accordance with	automatic or manual, must be performed in			
	CFR 547.12.		approved TGRA procedures. §11(k)	accordance with 25 CFR 547.12. 543.20(k)			
	Following downloads of any gaming system software; the		Verifying downloads. Following download of any	Following download of any Class II gaming			
	gaming system must verify the downloaded software		gaming system software, the gaming operation must	system software; the Class II gaming system			
	using a software signature verification method. Using any		verify the downloaded software using a software	must verify the downloaded software using			
2	method it deems appropriate, the CNGC must confirm		signature verification method. Using any method it	a software signature verification method.			
_	the verification.		deems appropriate, the TGRA must confirm the	Using any method it deems appropriate, the			
			verification. §11(I)	TGRA must confirm the verification.			
				543.20(1)			
20.4	User Controls		(f) User controls.				
	Systems, including application software, must be secured		Systems, including application software, must be	Systems, including application software,			
Α	with passwords or other means for authorizing access.		secured with passwords or other means for	must be secured with passwords or other			
			authorizing access. §11(f)(1)	means for authorizing access. 543.20(f)(1)			
	Management personnel or agents independent of the		Management personnel or agents independent of the				
Р	department being controlled must assign and control		department being controlled must assign and control	· · · · · · · · · · · · · · · · · · ·			
В	access to system functions.		access to system functions. §11(f)(2)	controlled must assign and control access			
				to system functions. 543.20(f)(2)			
	Access credentials such as passwords, PINs, or cards		Access credentials such as passwords, PINs, or cards	Access credentials such as passwords, PINs,			
C	must be controlled as follows:		must be controlled as follows: §11(f)(3)	or cards must be controlled as follows:			
				543.20(f)(3)			

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3				
1	Each user must have his or her own individual access credential;		Each user must have his or her own individual access credential; §11(f)(3)(i)	Each user must have his or her own individual access credential; 543.20(f)(3)(i)			
2	Access credentials must be changed at an established interval approved by the CNGC; and		Access credentials must be changed at an established interval approved by the TGRA; and §11(f)(3)(ii)	Access credentials must be changed at an established interval approved by the TGRA and 543.20(f)(3)(ii)			Access credentials must be changed at a minimum, every 90 days at an established interval approved by the CNGC; and
3	manually or by systems that automatically record access changes and force access credential changes, including	542.13(a)(3) For all computerized gaming machine systems, a personnel access listing shall be maintained, which includes at a minimum:	Access credential records must be maintained either manually or by systems that automatically record access changes and force access credential changes, including the following information for each user: §11(f)(3)(iii)	Access credential records must be maintained either manually or by systems that automatically record access changes and force access credential changes, including the following information for each user: 543.20(f)(3)(iii)			approved by the erice, und
a	User's name;	542.13(a)(3)(i) Employee name or employee identification number (or equivalent); and	User's name; §11(f)(3)(iii)(A)	User's name; 543.20(f)(3)(iii)(A)			
b	Date the user was given access and/or password change; and	equivalent), and	Date the user was given access and/or password change; and §11(f)(3)(iii)(B)	Date the user was given access and/or password change; and 543.20(f)(3)(iii)(B)			
C		542.13(a)(3)(ii) Listing of functions employee can perform or equivalent means of identifying the same.	Description of the access rights assigned to user. §11(f)(3)(iii)(C)	Description of the access rights assigned to user. 543.20(f)(3)(iii)(C)			
D	deactivated, secured or destroyed within an established	542.13(a)(3)(ii) Listing of functions employee can perform or equivalent means of identifying the same.	Lost or compromised access credentials must be deactivated, secured or destroyed within an established time period approved by the TGRA. §11(f)(4)	Lost or compromised access credentials must be deactivated, secured or destroyed within an established time period approved by the CNGC. 543.20(f)(4)		D	Lost or compromised access credentials must be deactivated, secured or destroyed within anestablished time period approved by the CNGC by the end of the next business day.
E	Access credentials of terminated users must be deactivated within an established time period approved by the CNGC.	542.13(a)(3)(ii) Listing of functions employee can perform or equivalent means of identifying the same.	Access credentials of terminated users must be deactivated within an established time period approved by the TGRA. §11(f)(5)	Access credentials of terminated users must be deactivated within an established time period approved by the TGRA. 543.20(f)(5)		E	Access credentials of terminated users must be deactivated within an established time period approved by the CNGC by the end of the next business day.
	Only authorized agents may have access to inactive or closed accounts of other users, such as player tracking accounts and terminated user accounts.		Only authorized agents may have access to inactive or closed accounts of other users, such as player tracking accounts and terminated user accounts. §11(f)(6)	,			
20.5	Backups		(i) Data backups.				
20.5	Controls must include adequate backup, including, but		Controls must include adequate backup, including, but	t Controls must include adequate backup.			
Α	not limited to, the following:		not limited to, the following: \$11(j)(1)	including, but not limited to, the following: 543.20(j)(1)			
1	Daily data backup of critical IT systems;		Daily data backup of critical information technology systems; §11(j)(1)(i)	Daily data backup of critical information technology systems; 543.20(j)(1)(i)			
2	Data backup of critical programs or the ability to reinstall the exact programs as needed;		Data backup of critical programs or the ability to reinstall the exact programs as needed; §11(j)(1)(ii)	Data backup of critical programs or the ability to reinstall the exact programs as needed; 543.20(j)(1)(ii)			
3	Secured storage of all backup data files and programs, or other adequate protection;		Secured storage of all backup data files and programs, or other adequate protection; \$11(j)(1)(iii)	, Secured storage of all backup data files and programs, or other adequate protection; 543.20(j)(1)(iii)			

		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3				
4	Mirrored or redundant data source; and,		Mirrored or redundant data source; and §11(j)(1)(iv)	Mirrored or redundant data source; and, 543.20(j)(1)(iv)			
5 R	Redundant and/or backup hardware.		Redundant and/or backup hardware. §11(j)(1)(v)	Redundant and/or backup hardware. 543.20(j)(1)(v)			
C	Controls must include recovery procedures, including,		Controls must include recovery procedures, including,	Controls must include recovery procedures,			Controls must include recovery procedures,
B b	out		but not limited to, the following: §11(j)(2)	including, but not limited to, the following: 543.20(j)(2)		В	including, but not limited to, the following;
1	Data backup restoration;		Data backup restoration; §11(j)(2)(i)	Data backup restoration; 543.20(j)(2)(i)			
2 P	Program restoration; and,		Program restoration; and §11(j)(2)(ii)	Program restoration; and, 543.20(j)(2)(ii)			
3 R	Redundant or backup hardware restoration.		Redundant or backup hardware restoration. §11(j)(2)(iii)	Redundant or backup hardware restoration. 543.20(j)(2)(iii)			
R	Recovery procedures must be tested on a sample basis at		Recovery procedures must be tested on a sample	Recovery procedures must be tested on a			
c s	pecified intervals at least annually. Results must be		basis at specified intervals at least annually. Results	sample basis at specified intervals at least			
d	documented.		must be documented. §11(j)(3)	annually. Results must be documented. 543.20(i)(3)			
В	Backup data files and recovery components must be		Backup data files and data recovery components must	Backup data files and recovery components			
n	nanaged with at least the same level of security and		be managed with at least the same level of security	must be managed with at least the same			
D a	access controls as the system for which they are		and access controls as the system for which they are	level of security and access controls as the			
	designed to support.		designed to support. §11(j)(4)	system for which they are designed to			
				support. 543.20(j)(3)			
20.6 F	Remote Access		(h) Remote access.				
A	Agents may be granted remote access for system		Agents may be granted remote access for system	Agents may be granted remote access for			
s	support, provided that each access session is		support, provided that each access session is	system support, provided that each access			
A d	documented and maintained at the place of		documented and maintained at the place of	session is documented and maintained at			
, a	authorization. The documentation must include:		authorization. The documentation must include:	the place of authorization. The			
			§11(h)(1)	documentation must include: 543.20(h)(1)			
1	Name of agent authorizing the access;		Name of agent authorizing the access; §11(h)(1)(i)	Name of agent authorizing the access; 543.20(h)(1)(i)			
2	Name of agent accessing the system;		Name of agent accessing the system; §11(h)(1)(ii)	Name of agent accessing the system; 543.20(h)(1)(ii)			
3 V	/erification of the agent's authorization;		Verification of the agent's authorization; §11(h)(1)(iii)	Verification of the agent's authorization; 543.20(h)(1)(iii)			
4 R	Reason for remote access;		Reason for remote access; §11(h)(1)(iv)	Reason for remote access; 543.20(h)(1)(iv)			
5	Description of work to be performed;		Description of work to be performed; §11(h)(1)(v)	Description of work to be performed; 543.20(h)(1)(v)			
	Date and time of start of end-user remote access session;		Date and time of start of end-user remote access	Date and time of start of end-user remote			
6 a	nnd		session; and §11(h)(1)(vi)	access session; and 543.20(h)(1)(vi)			
	Date and time of conclusion of end-user remote access		Date and time of conclusion of end-user remote	Date and time of conclusion of end-user			
_	ession.		access session. §11(h)(1)(vii)	remote access session. 543.20(h)(1)(vii)			
В	All remote access must be performed via a secured method.		All remote access must be performed via a secured method. §11(h)(2)	All remote access must be performed via a secured method. 543.20(h)(2)			
	ncident Monitoring and Reporting		(i) Incident monitoring and reporting.	3 13.20(1)(2)			
20.7 I	Procedures must be implemented for responding to,		Procedures must be implemented for responding to,	Procedures must be implemented for			
	, , , , , , , , , , , , , , , , , , , ,		monitoring, investigating, resolving, documenting, and	· · · · · · · · · · · · · · · · · · ·			
Р	nonitoring, investigating, resolving, documenting, and						
P n	nonitoring, investigating, resolving, documenting, and eporting security incidents associated with information			1			
P n A	eporting security incidents associated with information		reporting security incidents associated with	resolving, documenting, and reporting			
P n A				1			

REF		542	NIGC Class III Guidance	543	Tribal - State Compact	REF	Recommended Revisions
	Section 20 - Information Technology		BULLETIN 2018-3				
	All security incidents must be responded to within an		All security incidents must be responded to within an	All security incidents must be responded to			
D	established time period approved by the CNGC and		established time period approved by the TGRA and	within an established time period approved			
Б	formally documented.		formally documented. §11(i)(2)	by the TGRA and formally documented.			
1				543.20(i)(2)			

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
21.1	General.		13. What are the minimum internal control standards for auditing revenue?		Part 5. RULES AND REGULATIONS; MINIMUM REQUIREMENTS FOR OPERATIONS	General Standards.
	Supervision. Supervision must be provided as needed for gaming operations by an agent with authority equal to or greater than those being supervised.		13(a) Supervision. Supervision must be provided as needed for auditing revenue by an agent(s) with authority equal to or greater than those being supervised.	provided as needed for revenue audit by an agent(s) with authority equal to or greater than those being supervised.	H. Supervisory Line of Authority. The enterprise shall provide the TCA and SCA with a chart of supervisory lines of authority with respect to those directly responsible for the conduct of covered games, and shall promptly notify those agencies of any material changes thereto.	Supervision. Supervision must be provided as- needed for bingo revenue audit/accounting- operations by an agent with authority equal to- or greater than those being supervised. SICS- shall conform to the Supervisory Line of- Authority as provided for in Section 4 – General Provisions.
В	Audits must be performed by employees independent of the transactions being audited.	542.13(m)(1) Gaming machine accounting/auditing procedures shall be performed by employees who are independent of the transactions being reviewed.  542.10(k)(1) The keno audit function shall be independent of the keno department.  542.11(h)(1) The pari-mutuel audit shall be conducted by personnel independent of the parimutuel operation.  542.12(j)(1) The accounting and auditing procedures shall be performed by personnel who are independent of the transactions being audited/accounted for.	13(b) Independence. Audits must be performed by agent(s) independent of the transactions being audited.	543.24(b) <i>Independence</i> . Audits must be performed by agent(s) independent of the transactions being audited.		Audits must be performed by employees agent(s) independent of the transactions being audited.
C	The performance of revenue audit procedures, the exceptions noted, and the follow up of all revenue audit exceptions must be documented and maintained.	542.13(m)(10) All gaming machine auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.  542.12(j)(5) Evidence of table games auditing procedures and any follow-up performed shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.  542.11(h)(2) Documentation shall be maintained evidencing the performance of all pari-mutuel accounting and auditing procedures.	13(c) Documentation. The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.	543.24(c) <i>Documentation</i> . The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.		The performance of all revenue audit procedures, the exceptions noted, and the follow up of all revenue audit exceptions must be documented, and maintained for inspection, and provided to the CNGC upon request.
D	Controls must be established and procedures implemented to audit of each of the following operational areas in this document.		13(d) Controls must be established and procedures implemented to audit of each of the following operational areas:	543.24(d) Controls must be established and procedures implemented to audit of each of the following operational areas:		С
21.2	Bingo Audit Standards.			543.24(d)(1) <i>Bingo</i> .		Live Bingo Audit Standards.
						Each gaming operation shall perform the following auditing/accounting functions for Live Bingo operations:

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue  At the end of each month, verify the accuracy of			543.24(d)(1)(i) At the the end of each month,		
	the ending balance in the bingo control log by			verify the accuracy of the ending balance in the		
	reconciling it with the bingo paper inventory.			bingo control log by reconciling it with the		
Α	Investigate and document any variances noted.			bingo paper inventory. Investigate and		A
				document any variance noted.		
	Daily, reconcile supporting records and			543.24(d)(1)(ii) Daily, reconcile supporting		
В	documents to summarized paperwork or			records and documents to summarized		В
	electronic records (e.g. total sales and payouts			paperwork or electronic records (e.g. total sales		
	per shift and/or day).		12/1/(11/6) 4/1 / // //	and payouts per shift and/or day).		Act of the control of
	At least monthly, review variances related to		13(d)(11)(i) At least monthly, verify receipt,	543.24(d)(1)(iii) At least monthly, review		At least monthly, review variances related to
	bingo accounting data in accordance with an established threshold, which must include, at a		issuance, and use of controlled inventory,	variances related to bingo accounting data in accordance with an established threshold, which		bingo accounting data in accordance with an
	·		including, but not limited to, <b>bingo cards</b> , pull	must include, at a minimum, variance(s) noted		established threshold, including variances
	minimum, variance(s) noted by the Class II gaming system for cashless transactions in and		tabs, playing cards, keys, pre-numbered and/or multi-part forms.	by the Class II gaming system for cashless		related to the receipt, issuance, and use of bingo card inventories. which must include, at a
	out, electronic funds transfer in and out, external		muiti-part forms.	transactions in and out, electronic funds transfer		minimum, variance(s) noted by the Class II-
	bonus payouts, vouchers out and coupon			in and out, external bonus payouts, vouchers out		gaming system for cashless transactions in and
	promotion out. Investigate and document any			and coupon promotion out. Investigate and		
С	variance noted.			document any variance noted.		bonus payouts, vouchers out and coupon-
	variance noted.			document any variance noted.		promotion out. Investigate and document any
				543.24(d)(10)(i) At least monthly, verify		variance noted.
				receipt, issuance, and use of controlled		<del>variance noteu.</del>
				inventory, including, but not limited to, bingo		
				cards, pull tabs, playing cards, keys, pre-		
				numbered and/or multi-part forms.		
				· ·		
	At least monthly, review statistical reports for		13(d)(4)(v) At least monthly, review statistical	543.24(d)(1)(iv) At least monthly, review		At least monthly, review statistical reports for
	any deviations from the mathematical		reports for any deviations from the mathematical	statistical reports for any deviations from the		any deviations from the mathematical
	expectations exceeding a threshold established		expectations exceeding a threshold estalished by	mathematical expectations exceeding a		expectations exceeding a threshold established
	by the CNGC. Investigate and document any		the TGRA.	threshold established by the TGRA. Investigate		by the CNGC. Investigate and document any
	deviations compared to the mathematical			and document any deviations compared to the		deviations compared to the mathematical
D	expectations required to be submitted per §547.4 of the NIGC Technical Standards.			mathematical expectations required to be submitted per §547.4.		D expectations required to be submitted per- §547.4 of the NIGC Technical Standards.
	9547.4 of the NIGC reclinical standards.			submitted per 9547.4.		9347.4 of the MIGE TECHNICAL Standards.
	At least monthly, take a random sample, foot		13(d)(4)(vi) At least monthly, take a random	543.24(d)(1)(v) At least monthly, take a		At least monthly, take a random sample, foot
	the vouchers redeemed and trace the totals to		sample, foot the vouchers redeemed and trace the			the vouchers redeemed and trace the totals to
E	the totals recorded in the voucher system and to		totals to the totals recorded in the voucher system			the totals recorded in the voucher system and to
	the amount recorded in the applicable cashier's		and to the amount recorded in the applicable	recorded in the voucher system and to the		the amount recorded in the applicable cashier's
	accountability document.		cashier's accountability document.	amount recorded in the applicable cashier's accountability document.		accountability document.
21.3	Pull Tab Audit Standards.			543.24(d)(2) <i>Pull tabs</i> .		
	Daily, verify the total amount of winning pull			543.24(d)(2)(i) Daily, verify the total amount of		
А	tabs redeemed each day.			winning pull tabs redeemed each day.		A
	At the end of each month, verify the accuracy of			543.24(d)(2)(ii) At the end of each month, verify		
	the ending balance in the pull tab control log by			the accuracy of the ending balance in the pull		
В	reconciling the pull tabs on hand. Investigate			tab control log by reconciling the pull tabs on		В
	and document any variance noted.			hand. Investigate and document any variance		
	·			noted.		
	At least monthly, compare for reasonableness			543.24(d)(2)(iii) At least monthly, compare for		
С	the amount of pull tabs sold from the pull tab			reasonableness the amount of pull tabs sold		C
	control log to the amount of pull tab sales.			from the pull tab control log to the amount of		
				pull-tab sales.		

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue				·	
D	At least monthly, review statistical reports for any deviations exceeding a specified threshold, as defined by the CNGC. Investigate and document any large and unusual fluctuactions noted.			543.24(d)(2)(iv) At least monthly, review statistical reports for any deviations exceeding a specified threshold, as defined by the TGRA. Investigate and document any large and unusual fluctuations noted.		D
	Accounting/Auditing standards for gaming machines moved to Revenue Audit.	542.13(m) Accounting/auditing standards.	13(d)(4) Gaming Machines.	543.8 Bingo		21.4 Gaming Systems Audit Standards.
		542.13(m)(2) For on-line gaming machine monitoring systems, procedures shall be performed at least monthly to verify that the system is transmitting and receiving data from the gaming machines properly and to verify the continuing accuracy of the coin-in meter readings as recorded in the gaming machine statistical	13(d)(4)(i) For on-line gaming machine monitoring systems, procedures shall be performed at least monthly to verify that the system is transmitting and receiving data from the gaming machines properly and to verify the continuing accuracy of the coin-in meter readings as recorded in the gaming machine statistical report.			For on-line gaming machine monitoring systems, procedures shall be performed at least monthly to verify that the system is transmitting and receiving data from the gaming machines properly and to verify the continuing accuracy of meter readings as recorded in the gaming machine statistical report.
		fenort. 542.13(h)(20) Updates to the on-line gaming machine monitoring system to reflect additions, deletions, or movements of gaming machines shall be made at least weekly prior to in-meter readings and the weigh process.				Updates to the on-line gaming machine monitoring system to reflect additions, deletions, or movements of gaming machines shall be made at least weekly prior to in-meter readings and the weigh process.
		542.13(h)(10) Gaming machine in-meter readings shall be recorded at least weekly (monthly for Tier A and Tier B gaming operations) immediately prior to or subsequent to a gaming machine drop. Online gaming machine monitoring systems can satisfy this requirement. However, the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days.	5(h)(10) Gaming machine in-meter readings shall be recorded at least weekly (monthly for Tier A and Tier B gaming operations) immediately prior to or subsequent to a gaming machine drop. <b>On-line gaming machine monitoring systems can satisfy this requirement.</b> However, the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days.	,		Gaming machine in-meter readings shall be recorded at least weekly (monthly for Tier A and Tier B gaming operations) immediately prior to or subsequent to a gaming machine drop.  C
		542.13(h)(10) Gaming machine in-meter readings shall be recorded at least weekly (monthly for Tier A and Tier B gaming operations) immediately prior to or subsequent to a gaming machine drop. Online gaming machine monitoring systems can satisfy this requirement. However, the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days.	5(h)(10) Gaming machine in-meter readings shall be recorded at least weekly (monthly for Tier A and Tier B gaming operations) immediately prior to or subsequent to a gaming machine drop. <b>On-line gaming machine monitoring systems can satisfy this requirement.</b> However, the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period only if such extension is for no longer than six (6) days.	,		An on-line gaming machine monitoring system may be used to satisfy obtaining in-meter readings, wherein the time between readings may extend beyond one week in order for a reading to coincide with the end of an accounting period, only if such extension is for no longer than six (6) days.

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
		542.13(h)(11) The employee who records the in-	5(h)(11) The agent who records the in-meter			The agent who records the in-meter reading
		meter reading shall either be independent of the	reading shall either be independent of the count			shall either be independent of the soft count
		hard count team or shall be assigned on a rotating	team or shall be assigned on a rotating basis,			team or shall be assigned on a rotating basis,
		basis, unless the in-meter readings are randomly	unless the in-meter readings are randomly verified			unless the in-meter readings are randomly
		verified quarterly for all gaming machines and bill	quarterly for all gaming machines and bill			verified quarterly for all gaming machines and
		acceptors by a person other than the regular in-	acceptors by an agent other than the regular in-			bill acceptors by a person other than the regular
		meter reader.	meter reader.			in-meter reader.
		542.13(h)(12) Upon receipt of the meter reading	5(h)(12) Upon receipt of the meter reading			Upon receipt of the meter reading summary, the
		summary, the accounting department shall review	summary, the accounting department shall review			audit/accounting department shall review all
		all meter readings for reasonableness using pre-	all meter readings for reasonableness using pre-			D meter readings for reasonableness using pre-
		established parameters.	established parameters.			established parameters.
		542.13(h)(13) Prior to final preparation of	5(h)(13) Prior to final preparation of statistical			Prior to final preparation of statistical reports,
		statistical reports, meter readings that do not	reports, meter readings that do not appear			meter readings that do not appear reasonable
		appear reasonable shall be reviewed with gaming	reasonable shall be reviewed with gaming machine			shall be reviewed with gaming machine
		machine department employees or other	department agents or other appropriate			department employees or other appropriate
		appropriate designees, and exceptions	designees, and exceptions documented, so that			designees, and exceptions documented, so that
		documented, so that meters can be repaired or	meters can be repaired or clerical errors in the			meters can be repaired or clerical errors in the
		clerical errors in the recording of meter readings	recording of meter readings can be corrected.			recording of meter readings can be corrected.
		can be corrected.	22/19/20/20 20 20 20 20 20 20 20 20 20 20 20 20 2			
		542.13(m)(6) For each drop period,	13(d)(4)(iv) For each drop period,			For each drop period, audit/accounting agent(s)
		accounting/auditing employees shall compare the				shall compare the bill-in meter reading and/or
		- · · · · · · · · · · · · · · · · · · ·	bill-in meter reading to the total bill acceptor drop			coin-to-drop meter reading (as applicable) to
		amount for the period. Discrepancies shall be	amount for the period. Discrepancies shall be			the actual drop amount for the period.
		resolved before the generation/distribution of	resolved before the generation/distribution of			
		gaming machine statistical reports.	gaming machine statistical reports.			
		542.13(m)(4) For each drop period,	13(d)(4)(iii) For each drop period,			
		accounting/auditing personnel shall compare the	accounting/auditing personnel shall compare the			F
		coin-to-drop meter reading to the actual drop	coin-to-drop meter reading to the actual drop			
		amount. Discrepancies should be resolved prior to	amount. Discrepancies should be resolved prior to			
		generation/distribution of on-line gaming machine	generation/distribution of on-line gaming machine			
		monitoring system statistical reports.	monitoring system statistical reports.			

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.13(m)(5) Follow-up shall be performed for any one machine having an unresolved variance between actual coin drop and coin-to-drop meter reading in excess of three percent (3%) and over \$25.00. The follow-up performed and results of the investigation shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.  542.13(m)(7) Follow-up shall be performed for any one machine having an unresolved variance between actual currency drop and bill-in meter reading in excess of an amount that is both more than \$25 and at least three percent (3%) of the actual currency drop. The follow-up performed and results of the investigation shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	13(d)(4)(v) At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the TGRA.  e  13(d)(4)(iv) For each drop period, accounting/auditing employees shall compare the		That State Compact	Follow-up shall be performed for any one machine having an unresolved variance between actual drop and metered drop in excess of three percent (3%) and over twenty-five dollars (\$25). The follow-up performed and results of the investigation shall be documented, maintained for inspection, and provided to the CNGC upon request.
		amount for the period. Discrepancies shall be resolved before the generation/distribution of gaming machine statistical reports.  542.13(m)(4) For each drop period, accounting/auditing personnel shall compare the coin-to-drop meter reading to the actual drop amount. Discrepancies should be resolved prior to generation/distribution of on-line gaming machine monitoring system statistical reports.  542.13(m)(3) For weigh scale and currency interface systems, for at least one drop period per month accounting/auditing employees shall make such comparisons as necessary to the system	amount for the period. Discrepancies shall be resolved before the generation/distribution of gaming machine statistical reports.  13(d)(4)(iii) For each drop period, accounting/auditing personnel shall compare the coin-to-drop meter reading to the actual drop amount. Discrepancies should be resolved prior to generation/distribution of on-line gaming machine monitoring system statistical reports.  13(d)(4)(ii) For weigh scale and currency interface systems, for at least one drop period per month accounting/auditing employees shall make such comparisons as necessary to the system generated			For weigh scale and currency interface systems, for at least one drop period per month, accounting/auditing employees shall make such comparisons as necessary to the system
		generated count as recorded in the gaming machine statistical report. Discrepancies shall be resolved prior to generation/distribution of gaming machine reports.  542.13(m)(9) Accounting/auditing employees shall review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.	computerized gaming machine systems on a daily basis for propriety of transactions and unusual			generated count as recorded in the gaming machine statistical report. Discrepancies shall be resolved prior to generation/distribution of gaming machine reports.  Review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
		542.13(n)(1) In addition to the applicable auditing and accounting standards in paragraph (m) of this section, on a quarterly basis, the gaming operation shall foot all jackpot cash-out tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer system.	13(d)(4)(vi) At least monthly, take a random sample, foot the vouchers redeemed and trace the totals to the totals recorded in the voucher system and to the amount recorded in the applicable cashier's accountability document.			At least monthly, take a random sample of cashout tickets/vouchers, foot the tickets redeemed and trace the totals to the totals recorded in the host validation system and to the amount recorded in the applicable cashier's accountability document.  In addition, on at least a quarterly basis, accounting/auditing personnel shall foot all jackpot tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer system.
		produced by the nost valuation computer system.		543.24(d)(1)(iii) At least monthly, review variances related to bingo accounting data in accordance with an established threshold, which must include, at a minimum, variance(s) noted by the Class II gaming system for cashless transactions in and out, electronic funds transfer in and out, external bonus payouts, vouchers out and coupon promotion out. Investigate and document any variance noted.  543.8(I) <i>Variance</i> . The operation must establish, as approved by the TGRA, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 CFR 547.4, will be reviewed to determine the cause. Any such review must be documented.		In addition, at least monthly, accounting/auditing personnel shall review any variance(s) noted by the gaming system for cashless transactions in and out, electronic funds transfer in and out, external bonus payouts, cashout ticket/vouchers out, and coupon promotions out. The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed/investigated to determine the cause. The variance and investigation must be documented.
	ndards for Evaluating Gaming Machine Poretical and Actual Hold Percentages.	542.13(h) Standards for evaluating theoretical and actual hold percentages.	5(h) Standards for evaluating theoretical and actual hold percentages.	al Control of the Con		Analysis of Gaming System Performance Standards.
			5(h)(1) Accurate and current theoretical hold	Class II games are linked and the hold/payback		A Each gaming operation shall prepare gaming machine analysis reports, which compare actual hold percentages to theoretical hold percentages.  Accurate and current theoretical hold
		worksheets shall be maintained for each gaming machine.	worksheets shall be maintained for each gaming machine.	percentages may be grouped.		B worksheets shall be maintained for each gamin machine or group of identical machines (as applicable).

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.13(h)(5) The theoretical hold percentages used in the gaming machine analysis reports should be within the performance standards set by the manufacturer.	5(h)(5) The theoretical hold percentages used in the gaming machine analysis reports should be within the performance standards set by the manufacturer.	547.4(a) Fairness . No Class II gaming system may cheat or mislead users. All prizes advertised must be available to win during the game. A test laboratory must calculate and/or verify the mathematical expectations of game play, where applicable, in accordance with the manufacturers stated submission. The results must be included in the test laboratory's report to the TGRA. At the request of the TGRA, the manufacturer must also submit the mathematical expectations of the game play to the TGRA.		The theoretical hold percentages used in the gaming machine analysis reports should be within the performance standards set by the manufacturer.
		543.13(h)(14) A report shall be produced at least monthly showing month-to-date, year-to-date (previous twelve (12) months data preferred), and if practicable, life-to-date actual hold percentage computations for individual machines and a comparison to each machine's theoretical hold percentage previously discussed.	5(h)(14) A report shall be produced at least monthly showing month-to-date, year-to-date (previous twelve (12) months data preferred), and if practicable, life-to-date actual hold percentage computations for individual machines and a comparison to each machine's theoretical hold percentage previously discussed.  13(d)(4)(v) At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the TGRA.	543.24(d)(1)(iv) <b>At least monthly</b> , review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the TGRA. Investigate and document any deviations compared to the mathematical expectations required to be submitted per §547.4.		A report shall be produced at least monthly showing month-to-date, year-to-date (previous twelve (12) months data preferred), and if practicable, life-to-date actual hold percentage computations for individual machines or group of machines and a comparison to each machine's or group of machine's theoretical hold percentage, which shall be made available to the CNGC upon request.
		machine indicating the dates and type of changes	5(h)(6) Records shall be maintained for each machine indicating the dates and type of changes made and the recalculation of theoretical hold as a result of the changes.			Records shall be maintained for each machine or group of machines indicating the dates and type of changes made and the recalculation of the theoretical hold as a result of the changes to the gaming machine.
		542.13(h)(15) Each change to a gaming machine's theoretical hold percentage, including progressive percentage contributions, shall result in that machine being treated as a new machine in the statistical reports (i.e., not commingling various hold percentages), except for adjustments made in accordance with paragraph (h)(2) of this section.	theoretical hold percentage, including progressive percentage contributions, shall result in that machine being treated as a new machine in the statistical reports (i.e., not commingling various			Each change to a gaming machine's theoretical hold percentage, including progressive percentage contributions, shall result in that machine being treated as a new machine in the statistical reports (i.e., not commingling various hold percentages) except for adjustments made in accordance with (MGMD).
		542.13(h)(16) If promotional payouts or awards are included on the gaming machine statistical reports, it shall be in a manner that prevents distorting the actual hold percentages of the affected machines.	5(h)(16) If promotional payouts or awards are included on the gaming machine statistical reports it shall be in a manner that prevents distorting the actual hold percentages of the affected machines.			If promotional payouts or awards are included on the gaming machine statistical reports, it shall be in a manner that prevents distorting the actual hold percentages of the affected machines.

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.13(h)(18) For those machines that have experienced at least 100,000 wagering transactions, large variances (three percent (3%) recommended) between theoretical hold and actual hold shall be investigated and resolved by a department independent of the gaming machine department with the findings documented and provided to the Tribal gaming regulatory authority upon request in a timely manner.	5(h)(18) For those machines that have experienced a level of wagering transactions (as established by the gaming operations and approved by the TGRA), large variances between theoretical hold and actual hold shall be investigated and resolved by a department independent of the gaming machine department. The threshold for the variance as established by the gaming operations and approved by the TGRA.  13(d)(4)(v) At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the TGRA.	543.24(d)(1)(iv) At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding a threshold established by the TGRA. Investigate and document any deviations compared to the mathematical expectations required to be submitted per §547.4.  547.4(a) Fairness. No Class II gaming system may cheat or mislead users. All prizes advertised must be available to win during the game. A test laboratory must calculate and/or verify the mathematical expectations of game play, where applicable, in accordance with the manufacturers stated submission. The results must be included in the test laboratory's report to the TGRA. At the request of the TGRA, the manufacturer must also submit the mathematical expectations of the game play to the TGRA.		For those Class III gaming machines that have experienced at least one hundred thousand (100,000) wagering transactions, large variances, the operations shall establish, as approved by the CNGC, (three percent (3%) recommended) a variance threshold between theoretical hold and actual hold which shall be investigated and resolved by a department independent of the gaming machine department with the findings documented and provided to the CNGC upon request in a timely manner. This does not include linked network games.  For Class II gaming machines, the operation must establish, as approved by the CNGC, the threshold level at which a variance, including deviations from the mathematical expectations required by 25 CFR 547.4, will be reviewed to determine the cause. Any such review must be documented and provided to the CNGC upon request.
		542.13(h)(17) The statistical reports shall be reviewed by both gaming machine department management and management employees independent of the gaming machine department on at least a monthly basis.	5(h)(17) The statistical reports shall be reviewed by both gaming machine department management and management agents independent of the gaming machine department on at least a monthly basis.			The statistical reports shall be reviewed by both gaming machine department management and agents independent of the gaming machine department on at least a monthly basis.
		542.13(h)(2) For multi-game/multi-denominational machines, an employee or department independent of the gaming machine department shall:  542.13(h)(2)(i) Weekly, record the total coin-in	I 5(h)(2) For multi-game/multi-denominational machines, an employee or department independent of the gaming machine department shall:  5(h)(2)(i) Weekly, record the total coin-in meter;			K Multi-Denominational / Multi-Game (MDMG) Games:  For MDMG gaming systems, an agent or department independent of the gaming machine department shall:  On a weekly basis, record the coin-in meters;
		meter; 542.13(h)(2)(ii) Quarterly, record the coin-in meters for each paytable contained in the machine and	5(h)(2)(ii) Quarterly, record the coin-in meters for ; each paytable contained in the machine; and			On a quarterly basis, record the coin-in meters for each pay table contained in a gaming machine or group of gaming machines; and,

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.13(h)(2)(iii) On an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each game paytable.	5(h)(2)(iii) On an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each game paytable.			On an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each game pay table.
		542.13(h)(3) For those gaming operations that are unable to perform the weighted average calculation as required by paragraph (h)(2) of this section, the following procedures shall apply:	5(h)(3) For those gaming operations that are unable to perform the weighted average calculation as required by paragraph (g)(2) of this section, the following procedures shall apply:			For those gaming operations that are unable to perform the weighted average calculation as required by paragraph K(1)(a-c) of this section, the following procedures shall apply:
		542.13(h)(3)(i) On at least an annual basis, calculate the actual hold percentage for each gaming machine;	5(h)(3)(i) On at least an annual basis, calculate the actual hold percentage for each gaming machine;			On at least an annual basis, calculate the actual hold percentage for each gaming machine or group of gaming machines;
		542.13(h)(3)(ii) On at least an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report for each gaming machine to the previously calculated actual hold percentage; and	5(h)(3)(ii) On at least an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report for each gaming machine to the previously calculated actual hold percentage; and			On at least an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report for each gaming machine or group of gaming machines to the previously calculated actual hold percentage;
		542.13(h)(3)(iii) The adjusted theoretical hold percentage shall be within the spread between the minimum and maximum theoretical payback	5(h)(3)(iii) The adjusted theoretical hold percentage shall be within the spread between the minimum and maximum theoretical payback			The adjusted theoretical hold percentage shall be within the spread between the minimum and maximum theoretical payback percentages.
		percentages.  542.13(h)(4) The adjusted theoretical hold percentage for multi-game/multi-denominational machines may be combined for machines with exactly the same game mix throughout the year.	5(h)(4) The adjusted theoretical hold percentage for multi-game/multi-denominational machines may be combined for machines with exactly the same game mix throughout the year.			The adjusted theoretical hold percentage for MDMG gaming machine systems may be combined for machines with exactly the same game mix throughout the year.
		542.13(m)(8) At least annually, accounting/auditing personnel shall randomly verify that EPROM or other equivalent game software media changes are properly reflected in the gaming machine analysis reports.	13(d)(4)(vii) At least annually, accounting/auditing personnel shall randomly verify that equivalent game software media changes are properly reflected in the gaming machine analysis reports.			At least annually, accounting/auditing agents shall randomly verify that equivalent game software media changes are properly reflected in the gaming machine analysis reports.
		542.13(m)(9) Accounting/auditing employees shall review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.	13(d)(4)(viii) Review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.			Auditing/accounting agents shall review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.
New S	Section - Table Games Audit Standard	542.12(j) Accounting/Auditing standards.	13(d)(3) Table games.			21.6 Table Games Audit Standards.
						Each gaming operation shall perform the following auditing/accounting functions for Table Games operations:
		542.12(j)(2) If a table game has the capability to determine drop (e.g., bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.	13(d)(3)(i) If a table game has the capability to determine drop (e.g., bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.			If a table game has the capability to determine drop (e.g., bill-in/coin-drop meters, bill acceptor, computerized record, etc.) the dollar amount of the drop shall be reconciled to the actual drop by shift.
		542.12(j)(3) Accounting/auditing employees shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.	13(d)(3)(ii) Accounting/auditing agents shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.			Audit/accounting agents shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact		Recommended Revision
	Section 21 - Auditing Revenue						
		542.12(j)(4) All noted improper transactions or	13(d)(3)(iii) All noted improper transactions or				All noted improper transactions or unusual
		unusual occurrences shall be investigated with the	unusual occurrences shall be investigated with the	e		C	occurrences shall be investigated with the result
		results documented.	results documented.				documented.
		542.12(j)(6) A daily recap shall be prepared for the	13(d)(3)(iv) A daily recap shall be prepared for the				A daily recap shall be prepared for the day and
		day and month-to-date, which shall include the	day and month-to-date, which shall include the			D	month-to-date, which shall include the followin
		following information:	following information:				information:
		542.12(j)(6)(i) Drop;	13(d)(3)(iv)(A) Drop;			1	Drop;
		542.12(j)(6)(ii) Win; and	13(d)(3)(iv)(B) Win; and			2	Win; and
		542.12(j)(6)(iii) Gross revenue.	13(d)(3)(iv)(C) Gross revenue.			3	Gross revenue.
			13(d)(11)(i) At least monthly, verify receipt,	543.24(d)(10)(i) At least monthly, verify receipt,			At least monthly, verify the receipt, issuance, ar
			issuance, and use of controlled inventory,	issuance, and use of controlled inventory,			use of playing cards, dice, keys, and pre-
			including, but not limited to, bingo cards, pull tab	s, including, but not limited to, bingo cards, pull		E	numbered and multi-part forms related to table
			playing cards, keys, pre-numbered and/or multi-	tabs, playing cards, keys, pre-numbered and/or			games operations.
			part forms.	multi-part forms.			
			4(o) Variance. The operation must establish, as				The operation must establish, as approved by
			approved by the TGRA, the threshold level at which	ch			the CNGC, the threshold level at which a
			a variance must be reviewed to determine the			F	variance must be reviewed to determine the
			cause. Any such review must be documented.				cause. Any such review must be documented.
							For progressive table games or related
						G	pots/pools:
							Daily, reconcile the amount indicated on the
							progressive sign/meter to the cash counted or
							received by the cage and the payouts made fo
							each promotional progressive pot and pool. The
						1	reconciliation must be sufficiently documented
							including substantiation of differences and
							adjustments.
							adjustifierits.
							At least monthly, review all payouts for the
							promotional progressive pots, pools, or other
							promotions to verify payout accuracy and
						2	proper accounting treatment and that they are
							conducted in accordance with conditions
							provided to the patrons.
				543.24(d)(3)(iii) At the conclusion of each			At the conclusion of each contest/tournament,
				contest/tournament, reconcile all			reconcile all contest/tournament entry and
				contest/tournament entry and payout forms to		Н	payout forms to the dollar amounts recorded in
						- 11	
				the dollar amounts recorded in the appropriate			the appropriate accountability document.
۸۸	nalysis of Table Game Performance.	542.12(i) Analysis of table game perfomance	4(g) Analysis of table game performance	accountability document.			Analysis of Table Games Performance
An	larysis of Table Game Performance.					21.7	
		standards.	standards.				Standards.

REF CN	I TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
Section 21 - Au	uditing Revenue					
		542.19(b)(3) <b>Individual and statistical game</b> 4(g)(1) Re	ecords must be maintained by day and			Each gaming operation shall prepare individual
		records to reflect statistical drop, statistical win, shift indic	cating any single-deck blackjack games			and statistical game records, including any
		and the percentage of statistical win to that were	e dealt for an entire shift.			single-deck blackjack games that were dealt for
		statistical drop by each table game, and to				an entire shift, to reflect statistical drop,
		reflect statistical drop, statistical win, and the				statistical win, and the percentage of statistical
		percentage of statistical win to statistical drop for				win to statistical drop by each table game - by
		each type of table game, <b>by shift, by day,</b>				shift, by day, cumulative month-to-date and year
		cumulative month-to-date and year-to-date,				to-date.
		and individual and statistical game records				A
		reflecting similar information for all other				
		games;				
		g,				
		542.12(i)(1) Records shall be maintained by day				
		and shift indicating any single-deck blackjack				
		games that were dealt for an entire shift.				
		games that were dealer or an entire since				
		542.19(b)(3) Individual and statistical game records 4(g)(2) Re	peords reflecting hold persontage by table			Additionally, each gaming operation shall
		* ***	of game must be maintained by shift, by			prepare statistical game records, to reflect
		· / / /	ulative month-to-date, and cumulative			statistical drop, statistical win, and the
		each table game, <b>and to reflect statistical drop</b> , year-to-d	late.			percentage of statistical win to statistical drop
		statistical win, and the percentage of statistical				for each type of table game - by shift, by day,
		win to statistical drop for each type of table				cumulative month-to-date and year-to-date.
		game, by shift, by day, cumulative month-to-				
		date and year-to-date, and individual and				B
		statistical game records reflecting similar				В
		information for all other games;				
		E42 12(1/2) December of leasting to be left as according to				
		542.12(i)(2) Records reflecting hold percentage by				
		table and type of game shall be maintained by				
		shift, by day, cumulative month-to-date, and				
		cumulative year-to-date. 542.12(i)(1)/(2)				
		542.12(i)(3) This information shall be presented to 4(g)(3) Th	· · · · · · · · · · · · · · · · · · ·			This information shall be presented to and
		and reviewed by management independent of the reviewed				c reviewed by management independent of the
		pit department on at least a monthly basis. department	ent on at least a monthly basis.			pit department on at least a monthly basis.
		542.12(i)(4) The management in paragraph (i)(3) of 4(g)(4) Th	ne management in paragraph (a)(3) of this			The independent management in paragraph (C)
			nust investigate any unusual fluctuations			of this section shall investigate any unusual
		fluctuations in hold percentage with pit supervisory in hold pe	3			fluctuations in hold percentage with pit
		personnel.	ercentage with pit supervisory agents.			supervisory personnel.
			ne results of such investigations must be			The results of such investigations shall be
		_	ated, maintained for inspection, and			documented maintained for inspection and
		·	to the Tribal gaming regulatory authority			provided to the CNGC upon request.
		upon request. upon reg				provided to the cross apon request.
			ance. The operation must establish, as			The operation must establish, as approved by
			by the TGRA, the threshold level at which			the TGRA, the threshold level at which a variance
			e must be reviewed to determine the			F must be reviewed to determine the cause. Any
			y such review must be documented.			such review must be documented.
21.4 Card Games Audit Star	indards			543.24(d)(3) Card Games.		21.8 Card Games Audit Standards.
						Each gaming operation shall perform the
						following auditing / accounting functions for
						Card Games operations:

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
	Daily, reconcile the amount indicated on the			543.24(d)(3)(i) Daily, reconcile the amount		
	progressive sign/meter to the cash counted or			indicated on the progressive sign/meter to the		
	received by the cage and the payouts made for			cash counted or received by the cage and the		
	each promotional progressive pot and pool. This			payouts made for each promotional progressive		
Α	reconciliation must be sufficiently documented,			pot and pool. This reconciliation must be		
	including substantiation of differences and			sufficiently documented, including		
	adjustments.			substantiation of differences and adjustments.		
	adjustificitis.			substantiation of differences and adjustments.		
	At least monthly, review all payouts for the			543.24(d)(3)(ii) At least monthly, review all		
	promotional progressive pots, pools, or other			payouts for the promotional progressive pots,		
	promotions to verify payout accuracy and			pools, or other promotions to verify payout		
В	proper accounting treatment and that they are			accuracy and proper accounting treatment and		
	conducted in accordance with conditions			that they are conducted in accordance with		
	provided to the patrons.			conditions provided to the patrons.		
				· ·		
	At the conclusion of each contest/tournament,			543.24(d)(3)(iii) At the conclusion of each		
	reconcile all contest/tournament entry and			contest/tournament, reconcile all		
C	payout forms to the dollar amounts recorded in			contest/tournament entry and payout forms to		
	the appropriate accountability document.			the dollar amounts recorded in the appropriate		
				accountability document.		
			13(d)(11)(i) At least monthly, verify receipt,	543.24(d)(10)(i) At least monthly, verify receipt,		At least monthly, verify the receipt, issuance, ar
			issuance, and use of controlled inventory,	issuance, and use of controlled inventory,		use of playing cards, keys, and pre-numbered
			including, but not limited to, bingo cards, pull tabs,	including, but not limited to, bingo cards, pull		D and/or multi-part forms related to card games
			playing cards, keys, pre-numbered and/or multi-	tabs, playing cards, keys, pre-numbered and/or		operations.
			part forms.	multi-part forms.		
	New Section - Pari-Mutuel Audit Standards.	542.11(h) Accounting and auditing funtions.	13(d)(2) Pari-mutuel.			
						21.9 Pari-Mutuel Audit Standards.
		542.11(h) A gaming operation shall perform the				Each gaming operation shall perform the
		following accounting and auditing functions:				following auditing / accounting functions f
		Tonowing accounting and additing functions.				Pari-Mutuel operations:
		542.11(h)(3) An accounting employee shall review	13(d)(2)(i) Review handle, commission, and			Review handle, commission, and breakage for
		handle, commission, and breakage for each day's	breakage for each day's play and recalculate the			each day's play and recalculate the net amoun
		play and recalculate the net amount due to or from	1			A due to or from the systems operator on a
		the systems operator on a weekly basis.	on a weekly basis.			weekly basis.
		and systems operator on a weekly basis.	on a weekly basis.			Weekly Busis.
		542.11(h)(4) The accounting employee shall verify	13(d)(2)(ii) Verify actual cash/cash equivalents			Verify actual cash/cash equivalents turned in
		actual cash/cash equivalents turned in to the	turned in <b>daily</b> to the system's summary report for			daily to the system's summary report for each
		system's summary report for each cashier's drawer	each cashier's drawer (Beginning balance, ( + ) fills			cashier's drawer (Beginning balance, ( + ) fills
		(Beginning balance, (+) fills (draws), (+) net write	(draws), ( + ) net write (sold less voids), (-) payouts			B (draws), ( + ) net write (sold less voids), (-)
		(sold less voids), (-) payouts (net of IRS	(net of IRS withholding), (-) cashbacks (paids), (=)			payouts (net of IRS withholding), (-) cashback
		withholding), (-) cashbacks (paids), (=) cash turn-	cash turn-in).			(paids), (=) cash turn-in).
		in).				
		542.11(h)(5) An accounting employee shall	13(d)(2)(iii) Produce a gross revenue recap report			Produce a gross revenue recap report to
		produce a gross revenue recap report to calculate	to calculate gross revenue for each day's play and			calculate gross revenue for each day's play an
		gross revenue for each day's play and for a month-	for a month-to-date basis, including the following			C for a month-to-date basis, including the
		to-date basis, including the following totals:	totals:			following totals:
	1	542.11(h)(5)(i) Commission;	13(d)(2)(iii)(A) Commission;			1 Commission;
		542.11(h)(5)(ii) Positive breakage;	13(d)(2)(iii)(B) Positive breakage;			2 Positive breakage;
		542.11(h)(5)(iii) Negative breakage;	13(d)(2)(iii)(C) Negative breakage;			3 Negative breakage;
		542.11(h)(5)(iv) Track/event fees;	13(d)(2)(iii)(D) Track/event fees;			4 Track/event fees;
		542.11(h)(5)(v) Track/event fee rebates; and	13(d)(2)(iii)(E) Track/event fee rebates; and			5 Track/event fee rebates; and
		542.11(h)(5)(vi) Purged tickets.	13(d)(2)(iii)(F) Purged tickets.			6 Purged tickets.
		542.11(h)(6) All winning tickets and vouchers shall	13(d)(2)(iv) All winning tickets and vouchers shall			All winning tickets and vouchers shall be
		be physically removed from the SAM's for each	be physically removed from the kiosk for each			D physically removed from the kiosk for each day
						and the second s

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.11(h)(7) In the event a SAM does not balance	13(d)(2)(v) In the event a kiosk does not balance			In the event a kiosk does not balance for a day's
		for a day's play, the auditor shall perform the	for a day's play, the auditor shall perform the			E play, the auditor shall perform the following
		following procedures:	following procedures:			procedures:
		542.11(h)(7)(i) Foot the winning tickets and	13(d)(2)(v)(A) Foot the winning tickets and			Foot the winning tickets and vouchers deposited
		vouchers deposited and trace to the totals of SAM	• • • • • • • • • • • • • • • • • • • •			and trace to the totals of kiosk activity produced
		activity produced by the system;	activity produced by the system;			by the system;
		542.11(h)(7)(ii) Foot the listing of cashed vouchers	7 7 7 7			Foot the listing of cashed vouchers and trace to
		and trace to the totals produced by the system;	and trace to the totals produced by the system;			2 the totals produced by the system;
		542.11(h)(7)(iii) Review all exceptions for propriety	13(d)(2)(v)(C) Review all exceptions for propriety of			Review all exceptions for propriety of
		of transactions and unusual occurrences;	transactions and unusual occurrences;			3 transactions and unusual occurrences;
		542.11(h)(7)(iv) Review all voids for propriety;	13(d)(2)(v)(D) Review all voids for propriety;			Review all voids for propriety;
		542.11(h)(7)(v) Verify the results as produced by	13(d)(2)(v)(E) Verify the results as produced by the			Verify the results as produced by the system to
1		the system to the results provided by an	system to the results provided by an independent			the results provided by an independent source;
		independent source;	source;			the results provided by an independent source,
			is 13(d)(2)(v)(F) Regrade 1% of paid (cashed) tickets			Regrade 1% of paid (cashed) tickets to ensure
		to ensure accuracy and propriety; and	to ensure accuracy and propriety; and			accuracy and propriety; and
		542.11(h)(7)(vii) When applicable, reconcile the	13(d)(2)(v)(G) When applicable, reconcile the totals			When applicable, reconcile the totals of future
		totals of future tickets written to the totals	of future tickets written to the totals produced by			tickets written to the totals produced by the
		produced by the system for both earned and	the system for both earned and unearned take,			system for both earned and unearned take, and
		unearned take, and review the reports to ascertain	*			review the reports to ascertain that future
		that future wagers are properly included on the	wagers are properly included on the day of the			wagers are properly included on the day of the
		day of the event.	event.			event.
		542.11(h)(8) At least annually, the auditor shall foo				At least annually, foot the wagers for one day
		the wagers for one day and trace to the total	one day and trace to the total produced by the			F and trace to the total produced by the system.
		produced by the system.	system.			
		542.11(h)(9) At least one day per quarter, the	13(d)(2)(vii) At least one day per quarter,			At least one day per quarter, recalculate and
		auditor shall recalculate and verify the change in	recalculate and verify the change in the unpaid			G verify the change in the unpaid winners to the
		the unpaid winners to the total purged tickets.	winners to the total purged tickets.			total purged tickets.
			13(d)(2)(iv) At least monthly, review statistical			At least monthly, review statistical reports for
			reports for any deviations exceeding a specified			any deviations exceeding a specified threshold,
			threshold, as defined by the TGRA. Investigate and			H as defined by the CNGC. Investigate and
			document any large and unusual fluctuations			document any large and unusual fluctuations
			noted.			noted.
			3(h) Variance. The operation must establish, as			The operation must establish, as approved by
			approved by the TGRA, the threshold level at which			the CNGC, the threshold level at which a
			a variance must be reviewed to determine the			variance must be reviewed to determine the
			cause. Any such review must be documented.			cause. Any such review must be documented.
						T I
NI	ew Section - Keno Audit Standards.	542.10(k) Keno audit standards.	13(d)(1) Keno.			21.10 Keno Audit Standards.
INC	ew Section - Reno Addit Standards.	542.10(k) Keno audit standards.  542.10(k)(4) Keno audit shall perform the	15(d)(1) Kello.			ZZZZV INCHO Audit Standards.
		following:				
			13(d)(1)(i) At least annually, foot the write on the			At least annually, foot the write on the restricted
		the write on the restricted copy of the keno	restricted copy of the keno transaction report for a			copy of the keno transaction report for a
		transaction report for a minimum of one shift and				A minimum of one shift and compare the total to
		compare the total to the total as documented by	total as documented by the computer.			the total as documented by the computer.
		the computer.	total as documented by the computer.			the total as documented by the computer.
		Tale compater.				

	C41 04 A 1111 B	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	542.10(k)(3) For at least one shift every other	13(d)(1)(ii) For at least one shift every other month,			For at least one shift every other month, perform
		month, keno audit shall perform the following:	perform the following:			B the following:
,		month, keno addit shali perioriti the following.	perform the following.			the following.
		542.10(k)(3)(i) Foot the customer copy of the	13(d)(1)(ii)(A) Foot the customer copy of the			Foot the customer copy of the payouts and trace
		payouts and trace the total to the payout report;	payouts and trace the total to the payout report;			1 the total to the payout report; and
		and	and			
		542.10(k)(3)(ii) Regrade at least 1% of the winning	13(d)(1)(ii)(B) Regrade at least 1% of the winning			Regrade at least 1% of the winning tickets using
		tickets using the payout schedule and draw ticket.	tickets using the payout schedule and draw ticket.			the payout schedule and draw ticket.
,		542.10(k)(4)(i) For a minimum of five games per	13(d)(1)(iii) For a minimum of five games per week,			For a minimum of five games per week,
,		week, compare the video recording and/or digital record of the rabbit ears or wheel to the computer	compare the video recording and/or digital record of the rabbit ears or wheel to the computer			compare the video recording and/or digital record of the rabbit ears or wheel to the
,		transaction summary;	transaction summary;			computer transaction summary.
$\rightarrow$		542.10(k)(4)(ii) Compare net cash proceeds to the	13(d)(1)(iv) Daily, compare net cash proceeds to			Daily, compare net cash proceeds to the audited
		audited win/loss by shift and investigate any large	the audited win/loss by shift and investigate any			win/loss by shift and investigate any large cash
		cash overages or shortages (i.e., in excess of	large cash overages or shortages (i.e., in excess of			overages or shortages (i.e., in excess of \$25.00).
		\$25.00);	\$25.00);			The state of the s
		542.10(k)(4)(iii) Review and regrade all winning	13(d)(1)(v) Daily, review and regrade all winning			Daily, review and regrade all winning tickets
		tickets greater than or equal to \$1,500, including	tickets greater than or equal to \$1,500, including			greater than or equal to \$1,500, including all
		all forms that document that proper authorizations	all forms that document that proper authorizations			E forms that document that proper authorizations
		and verifications were obtained and performed;	and verifications were obtained and performed;			and verifications were obtained and performed.
		542.10(k)(4)(iv) Review the documentation for	12/d\/1\/.i\ Daily review the degree exterior for			Daily region the degree entation for manager
		payout adjustments made outside the computer	13(d)(1)(vi) Daily, review the documentation for payout adjustments made outside the computer			Daily, review the documentation for payout adjustments made outside the computer and
		and investigate large and frequent payments;	and investigate large and frequent payments;			investigate large and frequent payments.
,		and investigate large and frequent payments,	and investigate large and frequent payments,			investigate large and frequent payments.
		542.10(k)(4)(v) Review personnel access listing for	13(d)(1)(vii) Weekly, review personnel access listing			Weekly, review personnel access listing for
,		inappropriate functions an employee can perform;	for inappropriate functions an agent can perform;			G inappropriate functions an agent can perform.
,		542.10(k)(4)(vi) Review system exception	13(d)(1)(viii) Review system exception information			Review system exception information on a daily
		information on a daily basis for propriety of	on a daily basis for propriety of transactions and			basis for propriety of transactions and unusual
,		transactions and unusual occurrences including	unusual occurrences including changes to the			H occurrences including changes to the personnel
		changes to the personnel access listing;	personnel access listing;			access listing.
		542.10(k)(4)(vii) If a random number generator is	13(d)(1)(ix) If a random number generator is used,			If a random number generator is used, then at
,		used, then at least weekly review the numerical	then at least weekly review the numerical			least weekly review the numerical frequency
		frequency distribution for potential patterns; and	frequency distribution for potential patterns; and			distribution for potential patterns; and
		542.10(k)(4)(viii) Investigate and document results	13(d)(1)(x) Investigate and document results of all			Investigate and document results of all noted
		of all noted improper transactions or unusual	noted improper transactions or unusual			J improper transactions or unusual occurrences.
		occurrences.	occurrences.			
,		542.10(k)(5) When the keno game is operated by	13(d)(1)(xi) When the keno game is operated by			When the keno game is operated by one
		one person:	one person:			person:  The customer copies of all winning tickets in
		542.10(k)(5)(i)The customer copies of all winning tickets in excess of \$100 and at least 5% of all	13(d)(1)(xi)(A) The customer copies of all winning tickets in excess of \$100 and at least 5% of all			excess of \$100 and at least 5% of all other
,		other winning tickets shall be regraded and traced	other winning tickets shall be regraded and traced			winning tickets shall be regraded and traced to
		to the computer payout report;	to the computer payout report;			
		to the computer payout report,	to the computer payout report,			the computer payout report;
		542.10(k)(5)(ii) The video recording and/or digital	13(d)(1)(xi)(B) The video recording and/or digital			The video recording and/or digital record of
		record of rabbit ears or wheel shall be randomly	record of rabbit ears or wheel shall be randomly			rabbit ears or wheel shall be randomly
		compared to the computer game information	compared to the computer game information			compared to the computer game information
		report for at least 10% of the games during the	report for at least 10% of the games during the			report for at least 10% of the games during the
		shift; and	shift; and			shift; and
		542.10(k)(5)(iii) Keno audit personnel shall review	13(d)(1)(xi)(C) Review winning tickets for proper			Review winning tickets for proper authorization,
		winning tickets for proper authorization pursuant	authorization.			in accordance with Section XX - Keno, paragraph
		to paragraph (e)(6) of this section.				(E)(6).

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
		542.10(k)(6) In the event any person performs the	13(d)(1)(xii) In the event any person performs the			In the event any person performs the writer and
		writer and deskman functions on the same shift,	writer and deskman functions on the same shift,			deskman functions on the same shift, the
		the procedures described in paragraphs (k)(5)(i)	the procedures described in paragraphs (4)(xi)(A)			procedures described in paragraphs (4)(xi)(A)
		and (ii) of this section (using the sample sizes	and (B) of this section (using the sample sizes			and (B) of this section (using the sample sizes
		indicated) shall be performed on tickets written by	indicated) shall be performed on tickets written by			indicated) shall be performed on tickets written
		that person.	that person.			by that person.
		542.10(k)(7) Documentation (e.g., a log, checklist,	13(d)(1)(xiii) Documentation (e.g., a log, checklist,			Documentation (e.g., a log, checklist, etc.) that
		etc.) that evidences the performance of all keno	etc.) that evidences the performance of all keno			evidences the performance of all keno audit
		audit procedures shall be maintained.	audit procedures shall be maintained.			procedures shall be maintained.
		542.10(k)(8) A manager independent of the keno				A manager independent of the keno departmen
		department shall review keno audit exceptions,				shall review keno audit exceptions, and perform
		and perform and document investigations into				and document investigations into unresolved
		unresolved exceptions. The investigations shall be				N exceptions. The investigations shall be
		documented, maintained for inspection, and				documented, maintained for inspection, and
		provided to the Tribal gaming regulatory authority				provided to the CNGC upon request.
		upon request.				
		542.10(k)(9) When a multi-game ticket is part of				When a multi-game ticket is part of the sample
		the sample in paragraphs (k)(3)(ii), (k)(5)(i) and				in paragraphs (B)(2), (K)(1) and (L) of this section
		(k)(6) of this section, the procedures may be				the procedures may be performed for ten (10)
		performed for ten (10) games or ten percent (10%)				games or ten percent (10%) of the games won,
		of the games won, whichever is greater.				whichever is greater.
21.5	Gaming Promotions and Player Tracking		13(d)(6) Gaming promotionsand player tracking.	543.24(d)(4) Gaming promotions and player		21.11
21.5	Audit Standards			tracking.		21.11
1	At least monthly, review promotional payments,		13(d)(6)(i) At least monthly, review promotional	543.24(d)(4)(i) At least monthly, review		
ľ	drawings, and giveaway programs to verify		payments, drawings, and giveaway programs to	promotional payments, drawings, and giveaway		
A	payout accuracy and proper accounting		verify payout accuracy and proper accounting	programs to verify payout accuracy and proper		
1	treatment in accordance with the rules provided		treatment in accordance with the rules provided to	_		
t	to patrons.		patrons.	rules provided to patrons.		
	At least monthly, for computerized player		13(d)(6)(ii) At least monthly, for computerized	543.24(d)(4)(ii) At least monthly, for		
B t	tracking systems, perform the following		player tracking systems, perform the following	computerized player tracking systems, perform		
	procedures:		procedures:	the following procedures:		
F	Review authorization documentation for all		13(d)(6)(ii)(A) Review authorization documentation			
1 1	manual point additions/deletions for propriety;		for all manual point additions/deletions for	documentation for all manual point		
			propriety;	additions/deletions for propriety;		
_	Review exception reports, including transfers		13(d)(6)(ii)(B) Review exception reports, including	543.24(d)(4)(ii)(B) Review exception reports,		
2	between accounts; and		transfers between accounts; and	including transfers between accounts; and		
1	Review documentation related to access to		13(d)(6)(ii)(B) Review documentation related to	543.24(d)(4)(ii)(C) Review documentation		
3 i	inactive and closed accounts.		access to inactive and closed accounts.	related to access to inactive and closed		
	A.I		124 N/CV''') At 1	accounts.		
	At least annually, all computerized player		13(d)(6)(iii) At least annually, all computerized	543.24(d)(4)(iii) At least annually, all		
	tracking systems must be reviewed by		player tracking systems must be reviewed by	computerized player tracking systems must be		
	employees independent of the individuals that		agent(s) independent of the individuals that set up			
	set up or make changes to the system		or make changes to the system parameters. The	individuals that set up or make changes to the		
	parameters. The review must be performed to		review must be performed to determine that the	system parameters. The review must be		
(	determine that the configuration parameters are		configuration parameters are accurate and have	performed to determine that the configuration		
	accurate and have not been altered without		not been altered without appropriate management			
	appropriate management authorization.		authorization Document and maintain the test	altered without appropriate management		
Į,	Document and maintain the test results.		results.	authorization Document and maintain the test results.		
	Complimentary Services or Items Audit		13(d)(7) Complimentary services or items.	543.24(d)(5) Complimentary services or items.		

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
	At least monthly, review the reports required in		13(d)(7) Complimentary services or items. At least	543.24(d)(5) Complimentary services or items. At		At least monthly, review the reports required in
	Section 16 – Complimentaries. These reports		monthly, review the reports required in § 7(d).	least monthly, review the reports required in		Section 16 – Complimentaries. These reports
Α	must be made available to those entities		These reports must be made available to those	§543.13(c). These reports must be made		A must be made available to those entities
	authorized by the CNGC or by tribal law or		entities authorized by the TGRA or by tribal law or	available to those entities authorized by the		authorized by the CNGC or by tribal law or
	ordinance.		ordinance.	TGRA or by tribal law or ordinance.		ordinance.
			7(c) Complimentary services and items records	543.13(c) Complimentary services and items		Complimentary services and items records must
			must be summarized and reviewed for proper	records must be summarized and reviewed for		be summarized and reviewed for proper
			authorization and compliance with established	proper authorization and compliance with		B authorization and compliance with established
			authorization thresholds.	established authorization thresholds.		authorization thresholds.
			7(c)(1) A detailed reporting of complimentary	543.13(c)(1) A detailed reporting of		A detailed reporting of complimentary services
			services or items transactions that meet an	complimentary services or items transactions		or items transactions that meet an established
			established threshold approved by the TGRA must	that meet an established threshold approved by		threshold approved by the CNGC must be
			be prepared at least monthly.	the TGRA must be prepared at least monthly.		prepared at least monthly.
			13(d)(7) Complimentary services or items. At least	543.24(d)(5) Complimentary services or items. At		These reports must be made available to those
			monthly, review the reports required in § 7(d).	least monthly, review the reports required in		entities authorized by the CNGC or by tribal law
			These reports must be made available to those	§543.13(c). These reports must be made		or ordinance.
			entities authorized by the TGRA or by tribal law or	available to those entities authorized by the		
			ordinance.	TGRA or by tribal law or ordinance.		
	[Reserved].		7(d) Variances. The operation must establish, as	543.13(d) <i>Variances</i> . The operation must		The operation must establish, as approved by
			approved by the CNGC, the threshold level at	establish, as approved by the TGRA, the		the CNGC, the threshold level at which a
В			which a variance must be reviewed to determine	threshold level at which a variance must be		C variance must be reviewed to determine the
			the cause. Any such review must be documented.	reviewed to determine the cause. Any such		cause. Any such review must be documented.
	A Proceedings of the Process of the		12/ 1/0) P + 1 - 1	review must be documented.		
21.7	Audit Standards for Patron Deposit Accounts		13(d)(8) Patron deposit accounts.	543.24(d)(6) Patron deposit accounts.		21.13
	At least weekly, reconcile patron deposit		13(d)(8)(i) At least weekly, recocile patron deosit	543.24(d)(6)(i) At least weekly, reconcile patron		
Α	account liability (deposits + adjustments –		account liability (deposits ± adjustments -	deposit account liability (deposits		
	withdrawals = total account balance) to the		withdrawls = total account balance) to the system	±adjustments-withdrawals = total account		
	system record.		record.	balance) to the system record.		<del>                                     </del>
	At least weekly, review manual increases and		13(d)(8)(ii) At least weekly, review manual	543.24(d)(6)(ii) At least weekly, review manual		
В	decreases to/from player deposit accounts to		increases and decreases to/from player deposit	increases and decreases to/from player deposit		
	ensure proper adjustments were authorized.		accounts to ensure proper adjustments were authorized.	accounts to ensure proper adjustments were authorized.		
21.8	Drop and Count Audit Standards		13(d)(5) Drop and count.	543.24(d)(8) <i>Drop and count.</i>		21.14
	At least quarterly, unannounced currency		13(d)(5)(i) At least quarterly, unannounced	543.24(d)(8)(i) At least quarterly, unannounced		At least quarterly, unannounced currency
	counter and currency counter interface (if		currency counter and currency counter interface (if	currency counter and currency counter interface		counter/ <del>and</del> currency counter interface and
	applicable) tests must be performed, and the		applicable) tests must be performed, and the test	(if applicable) tests must be performed, and the		weigh scale/weigh scale interface (if applicable)
	test results documented and maintained. All		results documented and maintained. All	test results documented and maintained. All		tests must be performed, and the test results
	denominations of currency and all types of cash		denominations of currency and all types of vouche	r denominations of currency and all types of cash		documented and maintained. All denominations
Α	out tickets counted by the currency counter		counted by the currency counter must be tested.	out tickets counted by the currency counter		of currency and all types of cash out tickets
	must be tested. This test may be performed by		This test may be performed by internal audit or the			counted by the currency counter must be tested.
	internal audit or the CNGC. The results of these		TGRA. The result of these tests must be	internal audit or the TGRA. The result of these		This test may be performed by internal audit or
	tests must be documented and signed by the		documented and signed by the agent(s)	tests must be documented and signed by the		the CNGC. The results of these tests must be
	employee(s) performing the test.		performing the test.	agent(s) performing the test.		documented and signed by the employee
						agent(s) performing the test.

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue					
			13(d)(5)(ii) At least quarterly, unannounced weigh scale and weigh scale interface (if applicable) tests must be performed, and the test results documented and maintained. This test may be performed by internal audit or the TGRA. The result of these tests must be documented and signed by the agent(s) performing the test.	543.24(d)(8)(ii) At least quarterly, unannounced weigh scale and weigh scale interface (if applicable) tests must be performed, and the test results documented and maintained. This test may be performed by internal audit or the TGRA. The result of these tests must be documented and signed by the agent(s) performing the test.		
C	ontrolling access to drop and count keys, perform the following procedures:	542.41(t)(3) For computerized key security systems controlling access to gaming machine drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:  542.41(u)(3) For computerized key security systems controlling access to table games drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:	13(d)(5)(iii) For computerized key security systems controlling access to drop and count keys, perform the following procedures:	543.24(d)(8)(iii) For computerized key security systems controlling access to drop and count keys, perform the following procedures:		For computerized key security systems controlling access to drop and count keys, audit/accounting agents independent of the system administrator, perform the following procedures:  B
b ir ir u a tr a a d	by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes issers' access within the system (i.e., system diministrator). Determine whether the ransactions completed by the system diministrator provide adequate control over the ccess to the drop and count keys. Also, letermine whether any drop and count key(s) emoved or returned to the key cabinet by the system administrator was properly authorized;	542.41(t)(3)(i) <b>Daily</b> , review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the gaming machine drop and count keys. Also, determine whether any gaming machine drop and count keys (s) removed or returned to the key cabinet by the system administrator was properly authorized.  542.41(u)(3)(i) <b>Daily</b> , review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes user's access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide an adequate control over the access to the table games drop and count keys. Also, determine whether any table games drop and count key(s) removed or returned to the key	system indicating the transactions performed by the individual(s) that adds, deletes, and changes users' access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide adequate control over the access to the drop and count keys. Also, determine whether any drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized;	whether the transactions completed by the system administrator provide adequate control		At least quarterly Daily, review the report generated by the computerized key security system indicating the transactions performed by the individual(s) that adds, deletes, and changes users' access within the system (i.e., system administrator). Determine whether the transactions completed by the system administrator provide adequate control over the access to the drop and count keys. Also, determine whether any drop and count key(s) removed or returned to the key cabinet by the system administrator was properly authorized;

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
	Section 21 - Auditing Revenue	F42.41()(2)(2) F	12(1)(F)('')(P) At 1	542 244 (VO)(""VD) A+1		
	At least quarterly, review the report generated by the computerized key security system indicating all transaction performed to determine whether any unusual drop and count key removals or key returns occurred; and	542.41(t)(3)(ii) <b>For at least one day each month,</b> review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual gaming machine drop and count key removals or key returns occurred.	13(d)(5)(iii)(B) At least quarterly, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual drop and count key removals or key returns occurred; and	543.24(d)(8)(iii)(B) At least quarterly, review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual drop and count key removals or key returns occurred; and		At least quarterly, For at least one day each month, review the report generated by the computerized key security system indicating all transaction performed to determine whether any unusual drop and count key removals or key returns occurred; and
2		542.41(u)(3)(ii) <b>For at least one day each month,</b> review the report generated by the computerized key security system indicating all transactions performed to determine whether any unusual table games drop and count key removals or key returns occurred.				
	At least quarterly, review a sample of users that are assigned access to the drop and count keys to determine that their access to the assigned keys is appropriate relative to their job position.	542.41(t)(3)(iii) At least quarterly, review a sample of users that are assigned access to the gaming machine drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.	13(d)(5)(iii)(C) At least quarterly, review a sample of users that are assigned access to the drop and count keys to determine that their access to the assigned keys is appropriate relative to their job position.	543.24(d)(8)(iii)(C) At least quarterly, review a sample of users that are assigned access to the drop and count keys to determine that their access to the assigned keys is appropriate relative to their job position.		
3		542.41(u)(3)(iii) At least quarterly, review a sample of users that are assigned access to the table games drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.				
		542.41(t)(3)(iv) All noted improper transactions or unusual occurrences are investigated with the results documented.  542.41(u)(3)(iv) All noted improper transactions or				4 All noted improper transactions or unusual occurrences are investigated with the results documented.
		unusual occurrences are investigated with the				
	At least quarterly, an inventory of all controlled	results documented. 542.31(t)(4) Quarterly, an inventory of all count	13(d)(5)(iv) At least quarterly, an inventory of all	543.24(d)(8)(iv) At least quarterly, an inventory		
	keys must be performed and reconciled to records of keys made, issued, and destroyed. Investigations must be performed for all keys unaccounted for, and the investigation documented.	-	controlled keys must be performed and reconciled to records of keys made, issued, and destroyed. Investigations must be performed for all keys unaccounted for, and the investigation documented.			
С		542.31(u)(4) Quarterly, an inventory of all count room, table game drop box release, storage rack and contents keys is performed, and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys unaccounted for, with the investigations being documented.				
21.9	Cage, Vault, Cash, and Cash Equivalents Audit Standards		13(d)(10) Cage, vault, cash, and cash equivalents.	543.24(d)(9) Cage, vault, cash, and cash equivalents.		21.15
	At least monthly, the cage accountability must be reconciled to the general ledger.		13(d)(10)(i) At least monthly, the cage accountability must be reconciled to the general ledger.	543.24(d)(9)(i) At least monthly, the cage accountability must be reconciled to the general ledger.		At least monthly, the cage accountability must A be reconciled to the general ledger.
	At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.		13(d)(10)(ii) At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.	543.24(d)(9)(ii) At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.		At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.

fund boot out to mack denote bags Reccipated form recount the assubs acco	Section 21 - Auditing Revenue  ice annually, a count must be performed of all ads in all gaming areas (i.e. cages, vaults, and oths (including reserve areas)), kiosks, cash t ticket redemption machines, and change achines. Count all chips and tokens by momination and type. Count individual straps, gs, and imprest banks on a sample basis. concile all amounts counted to the amounts	13(d)(10)(iii) Twice annually, a count must be performed of all funds in all gaming areas (i.e.	543.24(d)(9)(iii) Twice annually, a count must be	
fund boot out to mack denote bags Reccipated form recount the assubs acco	nds in all gaming areas (i.e. cages, vaults, and oths (including reserve areas)), kiosks, cash at ticket redemption machines, and change archines. Count all chips and tokens by nomination and type. Count individual straps, gs, and imprest banks on a sample basis.	performed of all funds in all gaming areas (i.e.	-	
boot to mack denoted bags Reccorreco form recorreco the a substance of	oths (including reserve areas)), kiosks, cash ticket redemption machines, and change schines. Count all chips and tokens by momination and type. Count individual straps, gs, and imprest banks on a sample basis.		la aufaumand of all funda in all gamaing avecas (i.e.	1
out the mack denoted bags. Record form record the a substantial according to the analysis of t	t ticket redemption machines, and change ichines. Count all chips and tokens by momination and type. Count individual straps, gs, and imprest banks on a sample basis.		performed of all funds in all gaming areas (i.e.	
macl dence bags Reccorre	nomination and type. Count individual straps, gs, and imprest banks on a sample basis.	-	cages, vaults, and booths (including reserve	
denote bags Reccorrec	nomination and type. Count individual straps, gs, and imprest banks on a sample basis.		•	
Recc C reco form reco the a subs acco	gs, and imprest banks on a sample basis.	machines. Count all chips and tokens by	machines, and change machines. Count all chips	
C reco form reco the a subs		denomination and type. Count individual straps,	and tokens by denomination and type. Count	
c reco form reco the a subs acco	concile all amounts counted to the amounts	bags, and imprest banks on a sample basis.	individual straps, bags, and imprest banks on a	
form reco the a subs acco	concile all arribants counted to the arribants	Reconcile all amounts counted to the amounts	sample basis. Reconcile all amounts counted to	
form reco the a subs acco	orded on the corresponding accountability	recorded on the corresponding accountability	the amounts recorded on the corresponding	A
the a subs acco	ms to ensure that the proper amounts are	forms to ensure that the proper amounts are	accountability forms to ensure that the proper	
subs acco	orded. Maintain documentation evidencing	recorded. Maintain documentation evidencing the	amounts are recorded. Maintain documentation	
acco	amount counted for each area and the	amount counted for each area and the subsequent	evidencing the amount counted for each area	
	osequent comparison to the corresponding	comparison to the corresponding accountability	and the subsequent comparison to the	
	counting accountability form. The count must	form. The count must be completed within the	corresponding accountability form. The count	
lbe c	completed within the same gaming day for	same gaming day for all areas.	must be completed within the same gaming day	
	areas.		for all areas.	
Cou	unts must be observed by an individual	13(d)(10)(iii)(A) Counts must be observed by an	543.24(d)(9)(iii)(A) Counts must be observed by	
	lependent of the department being counted.	individual independent of the department being	an individual independent of the department	
		=		
T .	s permissible for the individual responsible for	counted. It is permissible for the individual	being counted. It is permissible for the individual	
	funds to perform the actual count while	responsible for the funds to perform the actual	responsible for the funds to perform the actual	
bein	ing observed.	count while being observed.	count while being observed.	
Inte	ernal audit may perform and/or observe the	13(d)(10)(iii)(B) Internal audit may perform and/or	543.24(d)(9)(iii)(B) Internal audit may perform	
2 two	o counts.	observe the two counts.	and/or observe the two counts.	
At le	least annually, select a sample of invoices for	13(d)(10)(iv) At least annually, select a sample of	543.24(d)(9)(iv) At least annually, select a	
chip	ps and tokens purchased, and trace the dollar	invoices for chips and tokens purchased, and trace	sample of invoices for chips and tokens	
amc	ount from the purchase invoice to the	the dollar amount from the purchase invoice to the	purchased, and trace the dollar amount from the	
D acco	countability document that indicates the	accountability document that indicates the increase	purchase invoice to the accountability document	В
	rease to the chip or token inventory to ensure	to the chip or token inventory to ensure that the	that indicates the increase to the chip or token	D
	it the proper dollar amount has been	proper dollar amount has been recorded.	inventory to ensure that the proper dollar	
	orded.		amount has been recorded.	
A+ 0	each business year end, create and maintain	13(d)(10)(v) At each business year end, create and	542 24(d)(0)(x). At each business year and	
	cumentation evidencing the amount of the	maintain documentation evidencing the amount of	-	
	p/token liability, the change in the liability	the chip/token liability, the change in the liability	the amount of the chip/token liability, the	
L 1	m the previous year, and explanations for	from the previous year, and explanations for	change in the liability from the previous year,	C
	ustments to the liability account including	adjustments to the liability account including any	and explanations for adjustments to the liability	
any i	y adjustments for chip/token float.	adjustments for chip/token float.	account including any adjustments for	
			chip/token float.	
At le	least monthly, review a sample of returned	13(d)(10)(vi) At least monthly, review a sample of	543.24(d)(9)(vi) At least monthly, review a	At least monthly, review a sample of returned
	ecks to determine that the required	returned checks to determine that the required	sample of returned checks to determine that the	checks to determine that the required
	ormation was recorded by cage employee(s)	information was recorded by cage agent(s) when	required information was recorded by cage	information was recorded by cage employee(s)
	en the check was cashed.	the check was cashed.	agent(s) when the check was cashed.	when the check was cashed.
Λ+ Ι.	least monthly, review exception reports for all	13(d)(10)(vii) At least monthly, review exception	543.24(d)(9)(vii) At least monthly, review	
	nputerized cage systems for propriety of	reports for all computerized cage systems for	exception reports for all computerized cage	
	nsactions and unusual occurrences. The			
	riew must include, but is not limited to, voided	propriety of transactions and unusual occurrences.	systems for propriety of transactions and	
_		The review must include, but is not limited to,	unusual occurrences. The review must include,	D
	thorizations. All noted improper transactions	voided authorizations. All noted improper	but is not limited to, voided authorizations. All	
	unusual occurrences identified must be	transactions or unusual occurrences identified	noted improper transactions or unusual	
inve	estigated and the results documented.	must be investigated and the results documented.	occurrences identified must be investigated and	
			the results documented.	

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact		Recommended Revision
	Section 21 - Auditing Revenue						
	Daily, reconcile all parts of forms used to		13(d)(10)(viii) Daily, reconcile all parts of forms	543.24(d)(9)(viii) Daily, reconcile all parts of			
	document increases/decreases to the total cage		used to document increases/decreases to the total	forms used to document increases/decreases to			
	inventory, investigate any variances noted, and		cage inventory, investigate any variances noted,	the total cage inventory, investigate any		-	
н	document the results of such investigations.		and document the results of such investigations.	variances noted, and document the results of		E	
				such investigations.			
				_			
21.10	Inventory Audit Standards		13(d)(11) Inventory	543.24(d)(10) <i>Inventory</i> .		21.16	
	At least monthly, verify receipt, issuance, and use		13(d)(11)(i) At least monthly, verify receipt,	543.24(d)(10)(i) At least monthly, verify receipt,			At least monthly, verify receipt, issuance, and use
	of controlled inventory, including, but not		issuance, and use of controlled inventory,	issuance, and use of controlled inventory,			of controlled inventory, including, but not
	limited to, bingo cards, pull tabs, playing cards,		including, but not limited to, bingo cards, pull tabs,	including, but not limited to, bingo cards, pull			limited to, bingo cards, pull tabs, playing cards,
	keys, pre-numbered and/or multi-part forms.		playing cards, keys, pre-numbered and/or multi- part forms.	tabs, playing cards, keys, pre-numbered and/or			keys, pre-numbered and/or multi-part forms.
Α			part forms.	multi-part forms.			
	Periodically perform minimum bankroll		13(d)(11)(ii) Periodically perform minimum bankrol	543.24(d)(10)(ii) Periodically perform minimum			
	calculations to ensure that the gaming operation		calculations to ensure that the gaming operation	bankroll calculations to ensure that the gaming			
В	maintains cash in an amount sufficient to satisfy		maintains cash in an amount sufficient to satisfy	operation maintains cash in an amount sufficient			
	the gaming operation's obligations.		the gaming operation's obligations.	to satisfy the gaming operation's obligations.			
	the garming operations obligations.		the gaming operation's obligations.	to satisfy the garming operations obligations.			
						21.17	Maintenance and preservation of books, records and documents.
		542.19(b)(5) The records required by this part and			Part 5(C) Records. In addition to other records		The gaming operation shall maintain all
		the Tribal internal control standards;			required to be maintained herein, the enterprise		accounting records required by this section, or
		and memor standards,			or tribe shall maintain the following records		any other records specifically required (as
		542.19(b)(7) Any other records specifically required			related to implementation of this Compact in		applicable) in permanent form and as written or
		to be maintained.			permanent form and as written or entered,		entered, whether manually or by computer, and
		to be maintained.			whether manually or by computer, and which	Α	which shall be maintained and made available
					shall be maintained by the enterprise and made		for inspection by the CNGC, the NIGC, and/or
					available for inspection by the SCA for no less		the SCA.
					than three (3) years from the date generated.		the SCA.
					than three (3) years from the date generated.		
		542.19(k)(1) All original books, records and					All books, records, and documents pertaining to
		documents pertaining to the conduct of wagering					the conduct of wagering activities shall be
		activities shall be retained by a gaming operation					retained by a gaming operation in accordance
		in accordance with the following schedule. A					with the following schedule. A record that
		record that summarizes gaming transactions is					summarizes transactions is sufficient, provided
		sufficient, provided that all documents containing					that all documents containing an original
		an original signature(s) attesting to the accuracy of					signature(s) attesting to the accuracy of a
		a gaming related transaction are independently					related transaction are independently preserved.
		preserved. Original books, records or documents					Original books, records, or documents shall not
		shall not include copies of originals, except for				В	include copies of originals, except for the copies
							that contain original comments or notations or
		copies that contain original comments or notations					3
		on parts of multi-part forms. The following original					parts of multi-part forms. The following original
		books, records and documents shall be retained by					books, records, and documents shall be retained
		a gaming operation for a minimum of five (5)					by the gaming operation for a minimum of five
		years:					(5) years:
		542.19(k)(1)(i) Casino cage documents;				1	Casino Cage/Vault documents.
		542.19(k)(1)(ii) Documentation supporting the				2	Documentation supporting the calculation of
		calculation of table game win;				2	table game win;

REF	CN TICS	542	NIGC Class III Guidance	543	Tribal - State Compact	Recommended Revision
S	Section 21 - Auditing Revenue					
		542.19(k)(1)(iii) Documentation supporting the				Documentation supporting the calculation of
		calculation of gaming machine win;				gaming machine win;
		542.19(k)(1)(iv) Documentation supporting the				Documentation supporting the calculation of
		calculation of revenue received from the games of				revenue received from games of pari-mutuel,
		keno, pari-mutuel, bingo, pull-tabs, card games,				4 keno, bingo, card games, pull-tabs, and all oth
		and all other gaming activities offered by the				gaming activities offered by the gaming
		gaming operation;				operation;
		542.19(k)(1)(v) Table games statistical analysis				Table games statistical analysis reports;
		reports;				
		542.19(k)(1)(vi) Gaming machine statistical analysis				Gaming machine statistical analysis reports;
		reports;				<u> </u>
						Bingo, pull-tab, keno and pari-mutuel wagerir
						statistical reports;
		542.19(k)(1)(x) All other books, records and				All other books, records and documents
		documents pertaining to the conduct of wagering				pertaining to the conduct of wagering activities
		activities that contain original signature(s) attesting				that contain original signature(s) attesting to
		to the accuracy of the gaming related transaction.				accuracy of the gaming related transaction.
		542.19(k)(2) Unless otherwise specified in this part,				Unless otherwise specified in this part, all other
		all other books, records, and documents shall be				books, records, and documents shall be retain
		retained until such time as the accounting records				until such time as the accounting records have
		have been audited by the gaming operation's				been audited by the gaming operation's
		independent certified public accountants.				independent certified public accountants.
		542.19(k)(3) The above definition shall apply				The above requirements shall apply without
		without regards to the medium by which the book,				regards to the medium by which the book,
		record or document is generated or maintained				D record, or document is generated or maintained
		(paper, computer-generated, magnetic media,				(paper, computer- generated, magnetic media
		etc.).				etc.).

					<b>-</b>				
REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact	REF Recommended Revisions
	Section 22 - Surveillance				Bulletin No. 2018-3				
	Definitions								
	Definitions used in previous and								
	subsequent sections retain their								
	meaning unless modified below:								
	Surveillance Room – a secure					543.2 Surveillance operation room(s). The			
	location(s) in a gaming operation					secured area(s) where surveillance takes place			
	used primarily for casino					and/or where active surveillance equipment is			
	surveillance.					located.			
	Surveillance System – a system					543.2 Surveillance system. A system of			
	of video cameras, monitors,					video cameras, monitors, recorders, video			
	recorders, video printers,					printers, switches, selectors, and other			
	switches, selectors, and other					equipment used for surveillance.			
	ancillary equipment used for								
	casino surveillance					Surveillance equipment and control room(s).			
22.2	General					543.21(b)			
					15(b) Surveillance equipment and control	543.21(b) Controls must be established and			Controls must be established and
					room(s). Controls must be established and	procedures implemented that include the			procedures implemented that
					procedures implemented that include the	following:			include the following:
					followina:				
Α	Surveillance Staffing	542.22() = -			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	542.244.747.5. =			
		542.23(a) <b>Tier A gaming operations must</b> , at			15(b)(1) For Tier A, the surveillance system	543.21(b)(1) For Tier A, the surveillance			
	· ·	a minimum, maintain and operate an unstaffed			must be maintained and operated from a	system must be maintained and operated			
1	-	surveillance system in a secured location			secured location, such as a locked cabinet. For	from a secured location, such as a locked			
	-	whereby the areas under surveillance are			Tiers B and C, the surveillance system must be	cabinet.			
		continually recorded.			maintained and operated from a staffed				
	continually recorded.				surveillance operation room(s).				
	For Tier B and C, The surveillance		542.33(a) The surveillance system shall be	542.43(a) The surveillance system shall be	15(b)(1) For Tier A, the surveillance system	543.21(b)(1) For Tiers B and C, the			For Tier B and C, The surveillance
	system shall be maintained and		maintained and operated from a staffed	maintained and operated from a staffed	must be maintained and operated from a	surveillance system must be maintained and			system shall be maintained and
	operated from a staffed		surveillance room and shall provide surveillance	surveillance room and shall provide surveillance	secured location, such as a locked cabinet. For	operated from a staffed surveillance			operated from a staffed surveillance
2	surveillance room and shall		over gaming areas.	over gaming areas.	Tiers B and C, the surveillance system must be	operation room(s). 543.21(b)(1)			operation room(s) and shall provide
	provide surveillance over gaming				maintained and operated from a staffed				surveillance over gaming areas.
	areas.				surveillance operation room(s).				
	S				15(a) Consensision Consensision access to	F42 21(a) Supervision must be availed as			Companision Companision arrest ha
	<b>Supervision.</b> Supervision must be				15(a) Supervision. Supervision must be	543.21(a) Supervision must be provided as			Supervision. Supervision must be
	provided as needed for				provided as needed for surveillance by an	needed for surveillance by an agent(s) with			provided as needed for surveillance- by an agent(s) with authority equal-
3	surveillance by an agent(s) with				agent(s) with authority equal to or greater than				to or greater than those being
	authority equal to or greater than those being supervised.				those being supervised.	being supervised.			supervised.
	those being supervised.								<del>superviseu.</del>
В	Location								
	The entrance to the surveillance	542.23(b) The entrance to the secured	542.33(b) The entrance to the surveillance	542.43(b) The entrance to the surveillance					
	room shall be located so that it is	location shall be located so that it is not	room shall be located so that it is not readily	room shall be located so that it is not readily					
	not readily accessible by either	readily accessible by either gaming operation	accessible by either gaming operation	accessible by either gaming operation					
		employees who work primarily on the casino	employees who work primarily on the casino	employees who work primarily on the casino					
	who work primarily on the casino	floor, or the general public.	floor, or the general public.	floor, or the general public.					
	floor, or the general public.								
С	Access								Access
		542.23(c) Access to the secured location	542.33(c) Access to the surveillance room	542.43(c) Access to the surveillance room	15(b)(2)(3)(4) The surveillance operation	543.21(b)(2)(3)(4) The surveillance operation			
		shall be limited to surveillance personnel,	shall be limited to surveillance personnel,	shall be limited to surveillance personnel,	room(s) must be secured to prevent	room(s) must be secured to prevent			
	shall be limited to surveillance	designated employees, and other persons	designated employees, and other persons	designated employees, and other persons	unauthorized entry. (3) Access to the	unauthorized entry. (3) Access to the			
	personnel, designated employees,	authorized in accordance with the surveillance	authorized in accordance with the surveillance	authorized in accordance with the surveillance	surveillance operation room(s) must be limited	surveillance operation room(s) must be			
		department policy. Such policy shall be	department policy. Such policy shall be	department policy. Such policy shall be	to surveillance agents and other authorized	limited to surveillance agents and other			
	accordance with the surveillance	approved by the Tribal gaming regulatory	approved by the Tribal gaming regulatory	approved by the Tribal gaming regulatory	persons. (4) Surveillance operation room(s)	authorized persons. (4) Surveillance			
	department policy. Such policy	authority.	authority. The surveillance department shall	authority. The surveillance department shall	access logs must be maintained.	operation room(s) access logs must be			
	shall be approved by the CNGC.		maintain a sign-in log of other authorized	maintain a sign-in log of other authorized		maintained.			
	The surveillance department shall		persons entering the surveillance room.	persons entering the surveillance room.					
1	maintain a sign-in log of other								
^	authorized persons entering the								
	surveillance room. Such policy								
	shall be approved by the CNGC.								
	The surveillance department shall								
	maintain a sign-in log of other								
	authorized persons entering the								
	surveillance room.								
	Training								
U	Training								

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
REF	Section 22 - Surveillance	342.23	342.33	342.43	Bulletin No. 2018-3	343	maai - State Compact	On-Track wagering compact REF	Recommended Revisions
	The surveillance department shall	542.23(e) The surveillance department shall	542 33(f) The surveillance department shall	542.43(q) The surveillance department shall	•	d 543.21(b)(8) All surveillance agents must be			The surveillance department shall
	strive to ensure staff is trained in	strive to ensure staff is trained in the use of the	-		1	trained in the use of the equipment, games,			strive to ensure staff is must be
1	the use of the equipment,	equipment, knowledge of the games, and		equipment, knowledge of the games, and	rules.	and house rules.			trained in the use of the equipment,
	knowledge of the games, and	house rules.	house rules.	house rules.	Total	una nouse raies.			knowledge of the games, and house
	house rules.	mode raics.	nouse raies.	mouse rules.					rules
E	Reporting								TAN-E
	CNGC-approved procedures must				15(d) Reporting requirements. TGRA approved	543.21(d) Reporting requirements. TGRA-			
	be implemented for reporting				procedures must be implemented for reporting	approved procedures must be implemented			
1	suspected crimes and suspicious				suspected crimes and suspicious activity.	for reporting suspected crimes and suspicious			
	activities.					activity.			
22.3	Equipment								
	For Tier A, controls must be				15(b) Surveillance equipment and control				
	established and procedures				room(s). Controls must be established and				
Α	implemented that include the				procedures implemented that include the				
	following equipment standards:				following:				
	<del>-</del>	542.22(1) = 11	542.22() = 1	542.42/0.=1	45(1)(2) 5 7' 4 (1 '11 '11 '11 '11 '11 '11 '11 '11 '11	542.24 (1) (1) E. T. A. (1)			- U
	The surveillance system must be	542.23(d) The surveillance system shall	542.33(e) The surveillance system shall	542.43(f) The surveillance system shall	15(b)(1) For Tier A, the surveillance system	543.21(b)(1)For Tier A, the surveillance system			The surveillance system must be
	maintained and operated form a	include date and time generators that possess	include date and time generators that possess	include date and time generators that possess	must be maintained and operated from a	must be maintained and operated from a			maintained and operated form from
	secured location, such as a locked	1	the capability to display the date and time of	the capability to display the date and time of	secured location, such as a locked cabinet. For	secured location, such as a locked cabinet.			a secured location, such as a locked
	cabinet. The surveillance system	recorded events on video and/or digital	recorded events on video and/or digital	recorded events on video and/or digital	Tiers B and C, the surveillance system must be	For Tiers B and C, the surveillance system			cabinet. The surveillance system
	shall include date and time	recordings. The displayed date and time shall	recordings. The displayed date and time shall	recordings. The displayed date and time shall	maintained and operated from a staffed	must be maintained and operated from a			shall must include date and time
	generators that possess the	not significantly obstruct the recorded view.	not significantly obstruct the recorded view.	not significantly obstruct the recorded view.	surveillance operation room(s).	staffed surveillance operation room(s).			generators that <del>possess the</del>
1	capability to accurately record				15(1)(7) 71	542.244.777.71			<del>capability to</del> accurately record and
_	and display the date and time of				15(b)(7) The surveillance system must record	543.21(b)(7) The surveillance system must			display the date and time of
	recorded events on video and/or				an accurate date and time stamp on recorded	record an accurate date and time stamp on			recorded events on video and/or
	digital recordings. The displayed				events. The displayed date and time must not	recorded events. The displayed date and time			digital recordings. The displayed
	date and time shall not				significantly obstruct the recorded view.	must not significantly obstruct the recorded			date and time shall not significantly
	significantly obstruct the					view.			obstruct the recorded view.
	recorded view.								
2	Each camera required by the	542.23(f) Each camera required by the	542.33(g) Each camera required by the	542.43(h) Each camera required by the	15(b)(9) Each camera required by the	543.21(b)(9) Each camera required by the			
	standards in this Section shall be	standards in this section shall be installed in	standards in this section shall be installed in	standards in this section shall be installed in	standards in this section must be installed in a	standards in this section must be installed in			
	installed in a manner that will	a manner that will prevent it from being readily	a manner that will prevent it from being readily	a manner that will prevent it from being readily	manner that will prevent it from being readily	a manner that will prevent it from being			
	prevent it from being readily	obstructed, tampered with, or disabled by	obstructed, tampered with, or disabled by	obstructed, tampered with, or disabled by	obstructed, tampered with, or disabled.	readily obstructed, tampered with, or			
	obstructed, tampered with, or	customers or employees.	customers or employees.	customers or employees.		disabled.			
	disabled by patrons or staff.	, ,		. ,					
	Each camera required by the	542.23(g) Each camera required by the	542.33(h) Each camera required by the	542.43(i) Each camera required by the	15(b)(10)(ii)(iii)(iv) Include sufficient numbers	543.21(b)(10)(i-iv) The surveillance system			Each camera required by the
	standards in this Section shall	standards in this section shall possess the	·	standards in this section shall possess the	of recording devices to record the views of all	must: Have the capability to display all			standards in this Section shall
	possess the capability of having	capability of having its picture recorded. The	capability of having its picture displayed on a	capability of having its picture displayed on a	cameras required by this section; (iii) Record	camera views on a monitor; (ii) Include			possess the capability of having its
	its picture recorded. The	surveillance system shall include sufficient	monitor and recorded. The surveillance system	monitor and recorded. The surveillance system	all camera views; and	sufficient numbers of recording devices to			picture recorded. The surveillance
	surveillance system shall include	numbers of recorders to simultaneously record		shall include sufficient numbers of monitors	(iv) For Tier B and C only, include sufficient	record the views of all cameras required by			system shall include sufficient
3	sufficient numbers of recorders to	l : = =	and recorders to simultaneously display and	and recorders to simultaneously display and	numbers of monitors to simultaneously display				numbers of monitors and of
3	simultaneously record multiple	record the views of all dedicated cameras and	record multiple gaming and count room	record multiple gaming and count room	gaming and count room activities.	(iv) For Tier B and C only, include sufficient			recorders to simultaneously record
		motion activated dedicated cameras.		activities, and record the views of all dedicated		numbers of monitors to simultaneously			multiple gaming and count room
	and record the views of all		cameras and motion activated dedicated	cameras and motion activated dedicated		display gaming and count room activities.			activities, and record the views of all
	dedicated cameras and motion		cameras.	cameras.					dedicated cameras and motion
	activated dedicated cameras.								activated dedicated cameras.
	The Surveillance room equipment		542.33(d) Surveillance room equipment	542.43(d) Surveillance room equipment	15(b)(5) Surveillance operation room	543.21(b)(5) Surveillance operation room			The Surveillance operation room
	shall have total override capability			shall have total override capability over all	equipment must have total override capability	equipment must have total override			equipment shall have total override
	over all other satellite surveillance		1 -	other satellite surveillance equipment located	over all other satellite surveillance equipment.	capability over all other satellite surveillance			capability over all other satellite
4	equipment located outside the		outside the surveillance room.	outside the surveillance room.		equipment.			surveillance equipment located
	surveillance operation room.								outside the surveillance operation
	- Fr								room.
	In the event of power loss to the				15(b)(6)(i) Power loss to the surveillance	543.21(b)(6)(i) Power loss to the surveillance			
	surveillance system, alternative				system: For Tier A, in the event of power loss	system: For Tier A, in the event of power loss			
1	security procedures, such as				to the surveillance system, alternative security	to the surveillance system, alternative security			
5	additional supervisory/				procedures, such as additional supervisory or	procedures, such as additional supervisory or			
	managerial or security personnel,				security agents, must be implemented	security agents, must be implemented			
	must be implemented				immediately.	immediately.			
<u> </u>	immediately				·	,			
	The surveillance system must		542.33(h) Each camera required by the	542.43(i) Each camera required by the	15(b)(10)(i) The surveillance system must:	543.21(b)(10)(i-iv) The surveillance system			
	have the capability to display all		•	standards in this section shall possess the	Have the capability to display all camera views	must: Have the capability to display all			
	camera views on a monitor.		capability of having its picture displayed on a	capability of having its picture displayed on a	on a monitor;	camera views on a monitor; (ii) Include			
			monitor and recorded. The surveillance system	monitor and recorded. The surveillance system		sufficient numbers of recording devices to			
_			shall include sufficient numbers of monitors	shall include sufficient numbers of monitors		record the views of all cameras required by			
6				and recorders to simultaneously display and		this section; (iii) Record all camera views; and			
1				record multiple gaming and count room		(iv) For Tier B and C only, include sufficient			
				activities, and record the views of all dedicated		numbers of monitors to simultaneously			
			cameras and motion activated dedicated	cameras and motion activated dedicated		display gaming and count room activities.			
			cameras.	cameras.		. , , , ,			

REF		542.23 542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
	Section 22 - Surveillance			Bulletin No. 2018-3			3. 3	
	For Tier B and C – in addition to			15(b) Surveillance equipment and control				
D	Tier A standards listed above, the			room(s). Controls must be established and				
L D	following shall apply:			procedures implemented that include the				
				followina:				
	The surveillance system must be	542.33(a) The surveillance system shall be		15(b)(1) For Tier A, the surveillance system				
	maintained and operated from a	maintained and operated from a staffed		must be maintained and operated from a				
	staffed surveillance operation	surveillance room and shall provide surveillan	nce	secured location, such as a locked cabinet. For	or			
	room(s). The surveillance system	over gaming areas.		Tiers B and C, the surveillance system must be				
	shall include sufficient numbers of			maintained and operated from a staffed				
1	monitors to simultaneously			surveillance operation room(s).				
	display gaming and count room							
	activities.			5(b)(10)(iv) For Tier B and C only, include				
				sufficient numbers of monitors to				
				simultaneously display gaming and count roor	m l			
				activities.				
	In the event of power loss to the		542.43(e) In the event of power loss to the	15(b)(6)(ii) For Tier B and C, in the event of	543.21(b)(6)(ii) For Tier B and C, in the event			
	surveillance system, an auxiliary		surveillance system, an auxiliary or backup	power loss to the surveillance system, an	of power loss to the surveillance system, an			
	or backup power source shall be		power source shall be available and capable	auxiliary or backup power source must be	auxiliary or backup power source must be			
	available and capable of		of providing immediate restoration of power to	1	available and capable of providing immediate			
	providing immediate restoration		all elements of the surveillance system that	restoration of power to the surveillance system				
	of power to all elements of the		enable surveillance personnel to observe the	to ensure that surveillance agents can observe	system to ensure that surveillance agents can			
	surveillance system that enable		table games remaining open for play and all	all areas covered by dedicated cameras.	observe all areas covered by dedicated			
	Surveillance personnel to observe		areas covered by dedicated cameras. Auxiliary		cameras.			
2	the table games remaining open		or backup power sources such as a UPS					
	for play and <b>all areas</b> covered by		System, backup generator, or an alternate					
	dedicated cameras. For Tier C,		utility supplier, satisfy this requirement.					
	auxiliary or backup power sources							
	such as a UPS System, backup							
	generator, or an alternate utility							
	supplier, will satisfy this							
	requirement.							
22.4	Surveillance Activity Logs	(y) <u>Surveillance Log.</u>		15/0	542 21/0 Leave weather weight in the de-			
Α	Logs must be maintained and demonstrate the following:			15(f) Logs. Logs must be maintained and demonstrate the following:	543.21(f) Logs must be maintained and demonstrate the following:			
	Compliance with the storage,			15(f)(1) Compliance with the storage,	543.21(f)(1) Compliance with the storage,			
	identification, and retention			identification, and retention standards required				
1	standards required in this section;			in this section;	required in this section;			
	standards required in this section,			and section,	required in this section,			
	Each malfunction and repair of			15(f)(2) Each malfunction and repair of the	543.21(f)(2) Each malfunction and repair of			
2	the surveillance system as defined			surveillance system as defined in this section;	the surveillance system as defined in this			
	in this section; and			and	section; and			
	Activities performed by			15(f)(3) Activities performed by surveillance	543.21(f)(3) Activities performed by			
3	surveillance agents as required by			agents as required by the controls in this	surveillance agents as required by the			
	the controls in this section.			section.	controls in this section.			
	For Tiers P and C Consultance	F42 22(A)(1)(2)(2)	E42.42(a)(1)(2)(2). Com					For Tiers B and C. Surveillance
	For Tiers B and C, Surveillance	542.33(y)(1)(2)(3) Surveillance personnel	542.43(z)(1)(2)(3) <b>Surveillance personnel</b> es. <b>shall</b> maintain a log of all surveillance activities.					personnel shall maintain a log of all
1			ca. pariem mammam a 104 of all surveillance delivilles.	1				I: =
1	personnel shall maintain a log of		<u> </u>				l l	
	all surveillance activities. Such	(2) Such log shall be maintained by	(2) Such log shall be maintained by					surveillance activities. Such log shall be maintained by Surveillance
	all surveillance activities. Such log shall be maintained by	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be					be maintained by Surveillance
В	all surveillance activities. Such log shall be maintained by Surveillance operation room	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance					be maintained by Surveillance operation room personnel and shall
В	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the</b>	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the</b>					be maintained by Surveillance operation room personnel and shall be stored securely within the
В	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the following information</b> shall be recorded in	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in a					be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a
В	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the</b>	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the</b>					be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information
В	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the following information</b> shall be recorded in	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in a					be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance
В	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance log:	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the following information</b> shall be recorded in surveillance log:	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in a surveillance log:					be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information
B 1	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance log:	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in surveillance log:  542.33(y)(3)(i) Date;	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in a surveillance log:  542.43(z)(3)(i) Date;				10(a)(5)(b) Date;	be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance
B 1 2	all surveillance activities. Such log shall be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance log:	(2) <b>Such log shall</b> be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) <b>At a minimum, the following information</b> shall be recorded in surveillance log:	(2) Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department. (3) At a minimum, the following information shall be recorded in a surveillance log:				10(a)(5)(b) Date; 10(a)(5)(c) Time;	be maintained by Surveillance operation room personnel and shall be stored securely within the Surveillance department. At a minimum, the following information shall be recorded in a surveillance

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
	Section 22 - Surveillance	- 12125	- 1200		Bulletin No. 2018-3			Truck Tragering compact REF	
	Activity observed or performed;		542.33(y)(3)(iii) Activity observed or	542.43(z)(3)(iii) Activity observed or				10(a)(5)(a-e) Cherokee Nation	
	and,			performed; and				Gaming Commission. The Cherokee	
								Nation Gaming Commission shall	
								assure or have responsibility for: (5)	
								recording any and all umusual	
								occurances Each incident eithour	
								regard to materiality shall be assigned	
								a sequential number, and at a	
								minimum the following informaion	
								shall be recorded in indeilible inck in a	
								bound sequentially page numbered	
3								notebook from which pages cannot be	
								removed without omission of page	
								number. An equaivalent means of	
								electronically storing the acquired data	
								methods will be acceptable in lieu of	
								the manual recording of data as set	
								forth in this subsection. Each	
								occurance shall be: (a) Assigned	
1								number; (b) Date; (c) Time; (d) Nature	
								of incident; (e) Person involved in the	
								incident.	
								meident.	
<b>—</b>	The name or license credential		542.33(y)(3)(iv) The name or license credential	542 43(z)(3)(iv). The name or license credential					
	number of each person who		number of each person who initiates, performs,						
4	initiates, performs, or supervises		i · · · · · · · · · · · · · · · · · · ·	or supervises the surveillance.					
	the surveillance.		or supervises the surveillance.	or supervises the surveillance.					
	the surveillance.								
	Surveillance personnel shall also		542.33(y)(4) Surveillance personnel shall also	542.43(z)(4) Surveillance personnel shall					
	record a summary of the results		_ ·	also record a summary of the results of the					
С	of the surveillance of any		-	surveillance of any suspicious activity. This					
	suspicious activity. This summary		summary may be maintained in a separate log.						
	may be maintained in a separate								
	log								
	Surveillance logs shall be						5(C) Records. In addition to other records required to		
	maintained by the gaming						be maintained herein, the enterprise or tribe shall		
	operation and made available for						maintain the following records related to		
	inspection by the SCA for no less						implementation of this Compact in permanent form		
	than three (3) years from the date						and as written or entered, whether manually or by		
	generated. Surveillance logs						computer, and which shall be maintained by the		
	may, at the discretion of the						enterprise and made available for inspection by the SCA		
	gaming operation, be destroyed if						for no less than three (3) years from the date		
	no incident has been reported						generated:		
	within one (1) year following the								
	date such records were made.						5(C)(1) A log recording all surveillance activities in the		
_	Records shall include video tapes						monitoring room of the facility, including, but not		
	and any other storage media.						limited to, surveillance records kept in the normal		
	,						course of enterprise operations and in accordance with		
							industry standards; provided, notwithstanding anything		
1							to the contrary herein, surveillance records may, at the		
1							discretion of the enterprise, be destroyed if no incident		
							has been reported within one (1) year following the		
							date such records were made. Records, as used in this		
1							Compact, shall include video tapes and any other		
1							storage media;		
22 E	Malfunction and Repair								
	Malfunction and Repair Malfunction and Repair Log	Malfunction and renair los							
	Surveillance personnel shall	Malfunction and repair log. 542.23(r)(1) Surveillance personnel shall	542.33(x)(1) Surveillance personnel shall	542.43(y)(1) Surveillance personnel shall			5(C)(3) Records. In addition to other records required	<del> </del>	
	· ·								
	maintain a log or alternative	maintain a log or alternative procedure		maintain a log or alternative procedure			to be maintained herein, the enterprise or tribe shall		
		approved by the Tribal gaming regulatory		approved by the Tribal gaming regulatory			maintain the following records related to		
1		authority that documents each malfunction		authority that documents each malfunction			implementation of this Compact in permanent form		
1	and repair of the surveillance		and repair of the surveillance system as defined				and as written or entered, whether manually or by		
*	system as defined in this Section.	in this section.	in this section.	in this section.			computer, and which shall be maintained by the		
1							enterprise and made available for inspection by the SCA	1	
1							for no less than three (3) years from the date		
							generated: (3) Maintenance logs for all covered games		
1							gaming equipment used by the enterprise;		
		1	l .				1	1	

DEF		E42 22	E42 22	E42.42	E42 Cuidan	E42	Tribal State Course	Off Treels Western Co.	Pacammandad Parisis as
REF	Section 22 - Surveillance	542.23	542.33	542.43	543 Guidance Bulletin No. 2018-3	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
2	The log shall state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.	542.23(r)(2) <b>The log shall</b> state the time, date, and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.	in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.	and nature of each malfunction, the efforts expended to repair the malfunction, and the date of each effort, the reasons for any delays in repairing the malfunction, the date the malfunction is repaired, and where applicable, any alternative security measures that were taken.					
В	In the event of a dedicated camera malfunction, the operation and/or the Surveillance department shall immediately, upon identification of the malfunction, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.	542.23(h)(1) In the event of a dedicated camera malfunction, the gaming operation and/or the surveillance department shall, upon identification of the malfunction, provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.	coverage or other security measures, such as	542.43(j)(1) In the event of a dedicated camera malfunction, the gaming operation and/or the surveillance department shall immediately provide alternative camera coverage or other security measures, such as additional supervisory or security personnel, to protect the subject activity.	15(b)(11)(i) If a dedicated camera malfunctions, alternative security procedures, such as additional supervisory or security agents, must be implemented immediately	543.21(b)(11)(i) If a dedicated camera malfunctions, alternative security procedures, such as additional supervisory or security agents, must be implemented immediately.			
С	A periodic inspection of the surveillance systems must be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours. The CNGC shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.	542.23(h) Reasonable effort shall be made to repair each malfunction of surveillance system equipment required by the standards in this section within seventy-two (72) hours after the malfunction is discovered. The Tribal gaming regulatory authority shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.	equipment required by the standards in this section within seventy-two (72) hours after the malfunction is discovered. The Tribal gaming regulatory authority shall be notified of any camera(s) that has malfunctioned for more	542.43(j) <b>Reasonable effort shall</b> be made to repair each malfunction of surveillance system equipment required by the standards in this section within seventy-two (72) hours after the malfunction is discovered. The Tribal gaming regulatory authority shall be notified of any camera(s) that has malfunctioned for more than twenty-four (24) hours.	15(b)(11)(ii) A periodic inspection of the surveillance systems must be conducted. Whe a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours. (ii) The TGRA must be notified of any surveillance system and/or camera(s) that have malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.	543.21(b)(11)(ii) A periodic inspection of the surveillance systems must be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours. (ii) The TGRA must be notified of any surveillance system and/or camera(s) that have malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.			A periodic inspection of the surveillance systems must be conducted. When a malfunction of the surveillance system is discovered, the malfunction and necessary repairs must be documented and repairs initiated within seventy-two (72) hours. The CNGC shall be notified of any surveillance system and/or camera(s) that has have malfunctioned for more than twenty-four (24) hours and the alternative security measures being implemented.
	Video/Digital Records and	(p) Video recording and/or digital record	(v) Video recording and/or digital record	(w) Video recording and/or digital record					
22.6	Retention	retention.	retention.	retention.					
					§15(e) Recording retention. Controls must be established and procedures implemented that	543.21(e) Recording retention. Controls			Controls must be established and
					le i i ai en e	•			procedures implemented that
А	the dedicated cameras or motion-	542.23(p)(1) All video recordings and/or digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.	3 . ,		include the following: 15(e)(1) All recordings required by this section must be retained for a minimum of seven day: and	implemented that include the following: 543.21(e)(1) All recordings required by this		A	procedures implemented that include the following:
В	records of coverage provided by the dedicated cameras or motion- activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  A video library log, or comparable alternative procedure approved	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.23(q) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory authority, shall be maintained to demonstrate	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.33(w) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.43(x) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory authority, shall be maintained to demonstrate	15(e)(1) All recordings required by this section must be retained for a minimum of seven days:	implemented that include the following: 1543.21(e)(1) All recordings required by this is section must be retained for a minimum of		A B	
В	records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  A video library log, or comparable alternative procedure approved by the CNGC, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this Section.  Recordings involving suspected or confirmed gaming crimes,	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.23(q) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory authority, shall be maintained to demonstrate compliance with the storage, identification, and	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.33(w) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory authority, shall be maintained to demonstrate compliance with the storage, identification, and retention standards required in this section.  542.33(v)(2) Recordings involving suspected or confirmed gaming crimes, unlawful activity,	digital records of coverage provided by the dedicated cameras or motion-activated dedicated cameras required by the standards in this section shall be retained for a minimum of seven (7) days.  542.43(x) Video library log. A video library log, or comparable alternative procedure approved by the Tribal gaming regulatory authority, shall be maintained to demonstrate compliance with the storage, identification, and	15(e)(1) All recordings required by this section must be retained for a minimum of seven days:	implemented that include the following:  543.21(e)(1) All recordings required by this section must be retained for a minimum of seven days; and  543.21(e)(2) Suspected crimes, suspicious activity, or detentions by security agents discovered within the initial retention period		A B	
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the payout line(s) of the gaming machine.  machine.  Wide-area progressive gaming machine soffering a base payout amount of 51 million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of camera(s) to provide coverage of status of the gaming machine.  All customers and employees at  when a payout line(s) of the gaming machine.  payout l					_ = =					
machine.  C Wide-area progressive: Wide-area progressive gaming machines offering a base payout amount of 0ne Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  All customers and employees at  All customers and employees at  Mide-area progressive:  Wide-area progressive gaming machines. (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at and control in the progressive in the p	2		I	-						
Wide-area progressive gaming machines offering a base payout amount of One Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded camera(s) to provide coverage of:  All customers and employees at  Wide-area progressive aming machines offering a base payout amount of \$1 million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded camera(s) to provide coverage of:  All customers and employees at  Wide-area progressive gaming machines offering a base payout amount of \$1 million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded camera(s) to provide coverage of:  All customers and employees at  All customers and			payout inlets) of the gaming machine.	payout inlets) of the gaming machine.	payout line(s) of the gaming machine.					
Wide-area progressive gaming machines offering a base payout amount of One Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at MI c	(					<u> </u>				
machines offering a base payout amount of One Million Dollars (\$1,000,000.00) or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  Machines offering a base payout amount of \$1 million; and machines offering a base payout amount of \$1 million; and machines offering a base payout amount of \$1 million; and million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  All customers and employees at  Mide-area progressive gaming machines offering a base payout amount of \$1 million; and million; and machines offering a base payout amount of \$1 million; and million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  of:  Mide-area progressive gaming machines offering a base payout amount of \$1 million; and million or more and monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  of:  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at	F		543 23(n)(3) Wide-area progressive	542 33(a)(3) Wide-area progressive	542 43(r)(3) Wide-area progressive machine	15(c)(1)(i) Wide area progressives with a rocot	543 21(c)(1)(i) Wide area progressives with a	<del> </del>		
amount of One Million Dollars (\$1,000,000,00) or more and monitored by an independent wendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  machines offering a base payout amount of \$1 million or more and monitored by an independent wendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  machines offering a base payout amount of \$1 million or more and monitored by an independent wendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at  All customers and employees at	1			l		1	· =			
(\$1,000,000.00) or more and monitored by an independent wendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  (\$1,000,000.00) or more and monitored by an independent wendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  MI customers and employees at  All customers and emplo	1						reset amount of \$1 minor, and			
monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at  monitored by an independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  independent vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  by a dedicated camera(s) to provide coverage of:  of:  All customers and employees at  by a dedicated camera(s) to provide coverage of:  by a dedicated camera(s) to provide coverage of:  by a dedicated camera(s) to provide coverage of:  of:  All customers and employees at  by a dedicated camera(s) to provide coverage of:  by a dedicated										
vendor utilizing an on-line progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at S42.23(n)(3)(i) All customers and employees at S42.43(r)(3)(i) All customers and employees at S42.43(r)(3				_	1					
progressive computer system shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at of substances of the control	1									
shall be recorded by a dedicated camera(s) to provide coverage of:  All customers and employees at 543.23(n)(3)(i) All customers and employees at 542.33(q)(3)(i) All	1 *									
camera(s) to provide coverage of:  All customers and employees at 543.23(n)(3)(i) All customers and employees at 542.33(q)(3)(i) All customers and employees at 542.43(r)(3)(i) All customers and employees at 542.43			by a dedicated camera(s) to provide coverage	by a dedicated camera(s) to provide coverage	dedicated camera(s) to provide coverage of:					
All customers and employees at 543.23(n)(3)(i) All customers and employees at 542.33(q)(3)(i) All customers and employees at 542.43(r)(3)(i) All customers and employees at 542.43(r)(3)(i) All customers and employees at 542.43(r)(3)(i) All customers and employees at 542.43(r)(3)(ii) All customers and employees at 542.43(r)(3)(ii) All customers and employees at 542.43(r)(3)(iii) All customers and employees at 542.43(r)(3)(iii) All customers and employees at 542.43(r)(3)(iii) All customers and employees at 542.43(r)(3)(iiii) All customers and employees at 542.43(r)(3)(iiii) All customers and employees at 542.43(r)(3)(iiii) All customers and employees at 542.43(r)(3)(iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	1		ot:	ot:						
	1	camera(s) to provide coverage of:								
	1									
		All customers and ampleyees ==	5/3 23(n)(3)(i) All customers and ampleus	5/12 33(g)(3)(i) All sustamore and ampleus	5/2/43(r)(3)(i) All customers and ampleus					All customers patrons and
employees at the gaming machine, and the gaming machin	2				1					· · · · · · · · · · · · · · · · · · ·
i i land,	a	the gaming machine; and,	the garning machine; and	the garning machine; and	the garning machine; and					employees at the gaming machine;
	<u> </u>	l .			L	l	l	l	l	Jand,

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
	Section 22 - Surveillance				Bulletin No. 2018-3		·		
	The face of the gaming machine,	543.23(n)(3)(ii) The face of the gaming	542.33(q)(3)(ii) The face of the gaming	542.43(r)(3)(ii) The face of the gaming					
L .	with sufficient clarity to identify	machine, with sufficient clarity to identify the	machine, with sufficient clarity to identify the	machine, with sufficient clarity to identify the					
D	the payout line(s) of the gaming	payout line(s) of the gaming machine.	payout line(s) of the gaming machine.	payout line(s) of the gaming machine.					
	machine.	3 3	, , , ,	, , ,					
	Notwithstanding paragraph	543.23(n)(4) Notwithstanding paragraph	542.33(q)(4) Notwithstanding paragraph	542.43(r)(4) Notwithstanding paragraph					
	22.8(A) of this Section, if the	(n)(1) of this section, if the gaming machine	(q)(1) of this section, if the gaming machine	(r)(1) of this section, if the gaming machine					
	gaming machine is a progressive	is a multi-game machine, the Tribal gaming	is a multi-game machine, the Tribal gaming	is a multi-game machine, the Tribal gaming					
	or multi-game machine, the	regulatory authority, or the gaming operation	regulatory authority, or the gaming operation	regulatory authority, or the gaming operation					
D	CNGC, or the operations subject	subject to the approval of the Tribal gaming	subject to the approval of the Tribal gaming	subject to the approval of the Tribal gaming					
	to the approval of the CNGC, may	regulatory authority, may develop and	regulatory authority, may develop and	regulatory authority, may develop and					
	develop and implement	implement alternative procedures to verify	implement alternative procedures to verify	implement alternative procedures to verify					
	alternative procedures to verify	payouts.	payouts.	payouts.					
	payouts.								
22.0	Table Games								
22.9	Except as otherwise provided in	E42 22(l)(1) Table sames Operations with	542 22(a)(1) Table sames Operations with	E42.42(p)(1) Table sames Operations with	15(c)(4)(i) Except for table game tournaments, a				Except as otherwise provided in
	Section 22.11 below, the	542.23(I)(1) Table games. Operations with		542.43(p)(1) <u>Table games.</u> Operations with	-				Section 22.11 below, the surveillance
		four (4) or more table games. Except as	four (4) or more table games. Except as	four (4) or more table games. Operations	dedicated camera(s) with sufficient clarity must				
	surveillance system of gaming	otherwise provided in paragraphs (I)(3), (I)(4),		with four (4) or more table games. Except	be used to provide:				system of gaming operations
	operations operating four (4) or	and (I)(5) of this section, the surveillance	and (o)(5) of this section, the surveillance	as otherwise provided in paragraphs (p)(3),					operating four (4) or more table
Α	more table games shall provide at		) system of gaming operations operating four (4)	1 7					games shall provide at a minimum a
	a minimum one (1) pan-tilt-zoom camera per two (2) tables and	or more table games shall provide at a minimum one (1) pan-tilt-zoom camera per	or more table games shall provide at a	system of gaming operations operating four (4)					dedicated camera(s), one (1) pan-tilt- zoom camera per two (2) tables, and
			minimum one (1) pan-tilt-zoom camera per	or more table games shall provide at a					surveillance must be capable of
	surveillance must be capable of	-	two (2) tables and surveillance must be capable	1				]	·
1	taping:	of taping:	of taping:	two (2) tables and surveillance must be capable					taping:
				of taping:					
1	With sufficient clarity to identify	542.23(I)(1)(i) With sufficient clarity to identify	542.33(o)(1)(i) With sufficient clarity to identify	542.43(p)(1)(i) With sufficient clarity to identify	15(c)(4)(i)(B) An overview of table game				With sufficient clarity to identify
1	customers and dealers; and,	customers and dealers; and	customers and dealers; and	customers and dealers; and	activities, including patrons and dealers.			]	customers patrons and dealers; and,
<u> </u>									
	With sufficient coverage and	542.23(l)(1)(ii) With sufficient coverage and	542.33(o)(1)(ii) With sufficient coverage and	542.43(p)(1)(ii) With sufficient coverage and	15(c)(4)(i)(A) An overview of the activities on				
	clarity to simultaneously view the	clarity to simultaneously view the table bank	clarity to simultaneously view the table bank	clarity to simultaneously view the table bank	each table surface, including card faces and				
2	table bank and determine the	and determine the configuration of wagers,	and determine the configuration of wagers,	and determine the configuration of wagers,	cash and/or cash equivalents; and				
	configuration of wagers, card	card values, and game outcome.	card values, and game outcome.	card values, and game outcome.					
	values, and game outcome.								
-	0 (1) dedi	F42 22/1/41/:::\ O== /1\ d=d:==t=d =======	F42 22(-)(1)(iii) O (1) d-dit-d	[42 42(a)(1)(iii) One (1) dedicated comme		+			
	One (1) dedicated camera per	542.23(I)(1)(iii) One (1) dedicated camera per	-	542.43(p)(1)(iii) One (1) dedicated camera per					
	table and one (1) PTZ camera per	table and one (1) pan-tilt-zoom camera per	table and one (1) pan-tilt-zoom camera per	table and one (1) pan-tilt-zoom camera per					
R	four (4) tables may be an		four (4) tables may be an acceptable alternative						
6	acceptable alternative procedure	procedure to satisfy the requirements of this	procedure to satisfy the requirements of this	procedure to satisfy the requirements of this					
	to satisfy the requirements of	paragraph.	paragraph.	paragraph.					
	subsection (A) in this standard.								
	The surveillance system of	542.23(l)(2) Operations with three (3) or	542.33(o)(2) Operations with three (3) or	542.43(p)(2) Operations with three (3) or	15(c)(4)(i) Except for table game tournaments,				
	operations operating three (3) or	fewer table games. The surveillance system of	-	fewer table games. The surveillance system	a dedicated camera(s) with sufficient clarity				
C	fewer table games shall:	_	gaming operations operating three (3) or fewer	_	must be used to provide:				
	3	table games shall:	table games shall:	fewer table games shall:	'				
	Comply with the requirements of	542.23(I)(2)(i) Comply with the requirements o	f 542.33(o)(2)(i) Comply with the requirements	542.43(p)(2)(i) Comply with the requirements	15(c)(4)(i) Except for table game tournaments,				Comply with the requirements of
1	paragraph 23.12 (A) of this	paragraph (I)(1) of this section; or	of paragraph (o)(1) of this section; or	of paragraph (p)(1) of this section; or	a dedicated camera(s) with sufficient clarity				paragraph <del>23.12</del> 22.9(A) of this
<u> </u>	Section; or				must be used to provide:				Section; or
	Have one (1) overhead camera at	542.23(I)(ii) Have one (1) overhead camera at		542.43(p)(2)(ii) Have one (1) overhead camera	15(c)(4)(i) Except for table game tournaments,				Have one (1) overhead dedicated
2	each table.	each table.	at each table.	at each table.	a dedicated camera(s) with sufficient clarity			]	camera at each table.
-	Drogressive table	E42 22(m) Progressive table access	E42 22(p)/1) Progressive table access	[42 42(a)(1) <b>Brownsi</b> t-t-1	must be used to provide:				
	Progressive table games with a	542.23(m) Progressive table games.	542.33(p)(1) Progressive table games.	542.43(q)(1) Progressive table games.	15(c)(4)(iii)(A) Progressive table games with a			]	
	guaranteed base jackpot of	Progressive table games with a progressive		Progressive table games with a progressive	progressive jackpot of \$25,000 or more shall be				
1	Twenty-five Thousand Dollars	jackpot of \$25,000 or more shall be	jackpot of \$25,000 or more shall be	jackpot of \$25,000 or more shall be	monitored and recorded by dedicated cameras			]	
D	(\$25,000.00) or more shall be	recorded by dedicated cameras that provide	-	monitored and recorded by dedicated cameras	triat provide coverage of.				
1	recorded and monitored by	coverage of:	that provide coverage of:	that provide coverage of:				]	
	dedicated cameras that provide								
1	coverage of the following:								
	The table surface sufficient that	542.23(m)(i) The table surface, sufficient that	542.33(p)(1)(i) The table surface, sufficient that	542.43(q)(1)(i) The table surface, sufficient that	15(c)(4)(iii)(A)(1) The table surface, sufficient			1	
1	the card values and card suits can	the card values and card suits can be clearly	the card values and card suits can be clearly	the card values and card suits can be clearly	that the card values and card suits can be			]	
	be clearly identified.	identified;	identified;	identified;	clearly identified;				
1	An overall view of the entire table	542.23(m)(ii) An overall view of the entire table		542.43(q)(1)(ii) An overall view of the entire	15(c)(4)(iii)(A)(2) An overall view of the entire				An overall view of the entire table
2	with sufficient clarity to identify	with sufficient clarity to identify customers and	table with sufficient clarity to identify	table with sufficient clarity to identify	table with sufficient clarity to identify			]	with sufficient clarity to identify
1 -	customers and dealers.	dealer; and	customers and dealer; and	customers and dealer; and	customers and dealer; and				<del>customers</del> patrons and dealers.
1	A view of the progressive meter	542.23(m)(iii) A view of the progressive meter		542.43(q)(1)(iii) A view of the progressive	15(c)(4)(iii)(A)(3) A view of the progressive				
	jackpot amount. If several tables	jackpot amount. If several tables are linked to	meter jackpot amount. If several tables are	meter jackpot amount. If several tables are	meter jackpot amount. If several tables are				
3	are linked to the same	the same progressive jackpot meter, only one	linked to the same progressive jackpot meter,	linked to the same progressive jackpot meter,	linked to the same progressive jackpot meter,				
	progressive jackpot meter, only	meter need be recorded.	only one meter need be recorded.	only one meter need be recorded.	only one meter need be recorded.			]	
1	one (1) meter need be recorded.								
22.10	Card Games		(I) Progressive card games.	(I) Progressive card games.					
	Cura Garries		(1) i rogressive curu guines.	(i) i rogressive cura gaines.					

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
	Section 22 - Surveillance			- 1-11-	Bulletin No. 2018-3			on mack wagering compact	
	Progressive card games with a		542.33(l)(1) Progressive card games with a	542.43(m)(1) Progressive card games with a					
	progressive jackpot of \$25,000 or		progressive jackpot of \$25,000 or more	progressive jackpot of \$25,000 or more shall be					
	more shall be monitored and		I =	monitored and recorded by dedicated cameras					
А	recorded by dedicated cameras		1 · · · · · · · · · · · · · · · · · · ·	that provide coverage of:					
	that provide coverage of:			and provide solutions					
	The table surface, sufficient that		542.33(I)(1)(i) The table surface, sufficient that	542.43(m)(1)(i) The table surface sufficient					
1	the card values and card suits can		the card values and card suits can be clearly	that the card values and card suits can be					
_	be clearly identified;		identified:	clearly identified;					
	An overall view of the entire table			542.43(m)(1)(ii) An overall view of the entire					An overall view of the entire table
	with sufficient clarity to identify			table with sufficient clarity to identify					with sufficient clarity to identify
2	customers and dealer; and		customers and dealer; and	customers and dealer; and					customers patrons and dealer; and
			·						
3	A view of the posted jackpot amount.		542.33(l)(1)(iii) A view of the posted jackpot amount.	542.43(m)(1)(iii) A view of the posted jackpot amount.					
	Except for card game		amount.	amount.		543.21(c)(3)(i) Except for card game			
	tournaments, a dedicated					tournaments, a dedicated camera(s) with			
В									
b	camera(s) with sufficient clarity					sufficient clarity must be used to provide:			
	must be used to provide:								
	An overview of the activities on					543.21(c)(3)(i)(A) An overview of the activities			
1	each card table surface, including					on each card table surface, including card			
_	card faces and cash and/or cash					faces and cash and/or cash equivalents;			
	equivalents;								
	An overview of card game					543.21(c)(3)(i)(B) An overview of card game			
2	activities, including patrons and					activities, including patrons and dealers; and			
	dealers; and								
	An unobstructed view of all					543.21(c)(3)(i)(C) An unobstructed view of all			
3	posted progressive pool amounts.					posted progressive pool amounts.			
	The surveillance system shall	542.23(j) <i>Card games.</i> The surveillance	542.33(k) <i>Card games.</i> The surveillance	542.43(l) <i>Card games</i> . The surveillance					The surveillance system shall recor
	record the general activities in	system shall record the general activities in	system shall monitor and record general	system shall monitor and record general					the general activities in each card
	each card room and be capable	each card room and be capable of identifying	activities in each card room with sufficient	activities in each card room with sufficient					room and be capable of identifying
	of identifying the employees	the employees performing the different		clarity to identify the employees performing					the employees performing the
	performing the different	functions.	the different functions.	the different functions.					different functions. For Tiers B and
	functions. For Tiers B and C only,	Turicustis.	the different functions.	and americal randoms.					Conly, tThe surveillance system sh
С	,								
	the surveillance system shall								monitor and record general activit
	monitor and record general							The surveillance system shall monitor	in each card room with sufficient
	activities in each card room with							and record general activities in each	clarity to identify the employees
	sufficient clarity to identify the							card room with sufficient clarity to	agents performing the different
	employees performing the							identify the employees performing the	functions.
	different functions.							different functions.	
22.11	Craps/Roulette/Big Wheel								
	All craps tables shall have two (2)	542.23(I)(3) <b>Craps.</b> All craps tables shall have	542.33(o)(3) Craps. All craps tables shall have						
Α	dedicated cross view cameras	_	two (2) dedicated cross view cameras covering	<u> </u>					
	covering both ends of the table.	both ends of the table.	both ends of the table.	both ends of the table.					
	All roulette areas shall have one	542.23(I)(4) Roulette. All roulette areas shall	542.33(o)(4) Roulette. All roulette areas shall	542.43(p)(4) Roulette. All roulette areas shall					
	(1) overhead dedicated camera	have one (1) overhead dedicated camera	have one (1) overhead dedicated camera	have one (1) overhead dedicated camera					
В	covering the roulette wheel and		covering the roulette wheel and shall also have						
В	shall also have one (1) dedicated	9		one (1) dedicated camera covering the play of					
		the table.	the table.	the table.					
	table		E42 22(a)(E) Big unhant All big had					<u> </u>	
C	All big wheel games shall have	542.23(I)(5) <b>Big Wheel.</b> All big wheel games		542.43(p)(5) <b><u>Big wheel.</u></b> All big wheel games					
C	_		-	shall have one (1) dedicated camera viewing					
	the wheel.	the wheel.	the wheel.	the wheel.	(4) Table games.				
22.12	Tournaments				15(c)(4)(ii) For table game tournaments, a	543.21(c)(3)(ii) For card game tournaments, a			For card and table game
22.12	For card game tournaments, a								
22.12					dedicated camera(s) must be used to provide	dedicated camera(s) must be used to provide			tournaments, a dedicated camera(s
22.12	For card game tournaments, a				<u>-</u>	dedicated camera(s) must be used to provide an overview of tournament activities, and any			tournaments, a dedicated camera(s must be used to provide an
22.12	For card game tournaments, a dedicated camera(s) must be used to provide an overview of				dedicated camera(s) must be used to provide an overview of tournament activities, and any	an overview of tournament activities, and any			
22.12	For card game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any				dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are	an overview of tournament activities, and any area where cash or cash equivalents are			must be used to provide an overview of tournament activities,
22.12	For card game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash				dedicated camera(s) must be used to provide an overview of tournament activities, and any	an overview of tournament activities, and any			overview of tournament activities, and any area where cash or cash
	For card game tournaments, a dedicated camera(s) must be used to provide an overview of tournament activities, and any				dedicated camera(s) must be used to provide an overview of tournament activities, and any area where cash or cash equivalents are	an overview of tournament activities, and any area where cash or cash equivalents are			must be used to provide an overview of tournament activities,

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
	Section 22 - Surveillance				Bulletin No. 2018-3				
	For Tiers B and C only, the		542.33(n) <i>Pari-mutuel.</i> The surveillance	542.43(o) <b>Pari-mutuel.</b> The surveillance	15(c)(3)(i) Monitor and record general activities			10(a)(5)(a-e) Cherokee Nation	For Tiers B and C only, tThe
	surveillance system shall monitor		system shall monitor and record general	system shall monitor and record general	in the pari-mutuel area, to include the ticket			Gaming Commission. The Cherokee	surveillance system shall monitor
	and record general activities		I STATE OF THE STA	activities in the pari-mutuel area, to include the				Nation Gaming Commission shall	and record general activities
	occurring in the pari-mutuel area, to include the ticket writer/cashier			ticket writer and cashier areas, with sufficient	to identify the agents performing the different			assure or have responsibility for:	occurring in the pari-mutuel area, to include the ticket writer/cashier and
	to include the ticket writer/cashier and customers, with sufficient		1 1 1 1 1	clarity to identify the employees performing the different functions.	functions.			recording any and all umusual occurances Each incident eithour	customers, with sufficient clarity to
	clarity to identify the employees		the different functions.	the different functions.				regard to materiality shall be assigned	identify the employees performing
	performing the different							a sequential number, and at a	the different functions.
1.5	functions.							minimum the following information	the different functions.
	idiretions.							shall be recorded in indeilible inck in a	
								bound sequentially page numbered	
								notebook from which pages cannot be	
								removed without omission of page	
								number. An equaivalent means of	
								electronically storing the acquired data	
								methods will be acceptable in lieu of	
								the manual recording of data as set	
								forth in this subsection. Each	
								occurance shall be: (a) Assigned	
								number; (b) Date; (c) Time; (d) Nature	
								of incident; (e) Person involved in the	
								incident.	
								22.14	Keno
		542.23(k) <i>Keno</i> . The surveillance system shall	542.33(m)(1) <i>Keno.</i> The surveillance system	542.33(n)(1) <i>Keno.</i> The surveillance system	15(c)(5)(i) Monitor the keno ball-drawing			22.17	The surveillance system shall
		record the keno ball-drawing device, the	1	shall possess the capability to monitor the	device or random number generator, which				monitor the keno ball-drawing
		general activities in each keno game area, and	keno ball-drawing device or random number	keno ball-drawing device or random number	shall be recorded during the course of the draw				device or random number
		be capable of identifying the employees	generator, which shall be recorded during the	generator, which shall be recorded during the	by a dedicated camera with sufficient clarity to				generator, which shall be recorded
		performing the different functions.	course of the draw by a dedicated camera with	course of the draw by a dedicated camera with	identify the balls drawn or numbers selected.			A	during the course of the draw by a
			sufficient clarity to identify the balls drawn or	sufficient clarity to identify the balls drawn or					dedicated camera with sufficient
			numbers selected.	numbers selected.					clarity to identify the balls drawn or
									numbers selected.
			542.33(m)(2) The surveillance system shall		15(c)(5) Monitor and record general activities				Monitor and record general
			monitor and record general activities in each		in each keno game area with sufficient clarity				activities in each keno game area
			keno game area with sufficient clarity to		to identify the agents performing the different			В	with sufficient clarity to identify the
			identify the employees performing the		functions.				agents performing the different
22.14 K	Via ala		different functions.					22.15	functions.
	The surveillance system must				15(c)(8) Kiosks: The surveillance system must 543.21(c)(6) Ki	Kiosks: The surveillance system		22.13	
	monitor and record a general				* * * * * * * * * * * * * * * * * * * *	r and record a general overview			
	overview of activities occurring at				=	occurring at each kiosk with			
e	each kiosk with sufficient clarity				=	ity to identify the activity and			
t/	to identify the activity and the				individuals performing it, including the individuals	Is performing it, including			
ir	individuals performing it,				maintenance, drops or fills, and redemption of maintenance, or	, drops or fills, and redemption			
ir	including maintenance, drops or				wagering vouchers or credits. of wagering vo	vouchers or credits.			
fi	fills, and redemption of wagering								
v.	vouchers or credits.								
22.15 N	Main Cage/ Vaults/Soft							22.16	
C	Count/Drop and Issue		Cage and vault.	Cage and vault.				22.10	
	Cage/Vault/Soft Count The surveillance system shall		542.33(r)(1) The surveillance system shall	542.43(s)(1) The surveillance system shall	15(c)(6)(i) The surveillance system must 543.21(c)(4)(i)	) The surveillance system must			The surveillance system shall
	monitor and record a general		monitor and record a general overview of	monitor and record a general overview of	=	record a general overview of			monitor and record a general
	overview of activities occurring in		activities occurring in each cage and vault area	<u> </u>	=	urring in each cage and vault			overview of activities occurring in
	each cage and vault area with		with sufficient clarity to identify employees	with sufficient clarity to identify employees	= =	ficient clarity to identify			each cage and vault area with
	sufficient clarity to identify			within the cage and customers and employees		ithin the cage and patrons and			sufficient clarity to identify
	employees within the cage and		at the counter areas.	at the counter areas.		rs at the counter areas and to			employees individuals within the
	customers and employees at the					mount of each cash transaction;			cage and customers and employees
		1							at the counter areas, and to confirm
	counter areas, and to confirm the							l I	the amount of each cash
ce									
ce	counter areas, and to confirm the								transaction.
a	counter areas, and to confirm the		542.33(r)(2) Each cashier station shall be	542.43(s)(2) Each cashier station shall be	15(c)(6)(ii) Each cashier station must be 543.21(c)(4)(ii)	i) Each cashier station must be			
co ar Ea	counter areas, and to confirm the amount of each cash transaction.		542.33(r)(2) Each cashier station shall be equipped with one (1) dedicated overhead	542.43(s)(2) <b>Each cashier station shall</b> be equipped with one (1) dedicated overhead		i) Each cashier station must be h one (1) dedicated overhead			
Each end of the control of the contr	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the				equipped with one (1) dedicated overhead equipped with				
Ei-	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.		equipped with one (1) dedicated overhead camera covering the transaction area.	equipped with one (1) dedicated overhead camera covering the transaction area.	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			transaction.
Ei 2 ee 0 tr	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.  For Tiers B and C only, the		equipped with one (1) dedicated overhead camera covering the transaction area.  542.33(r)(3) The surveillance system shall	equipped with one (1) dedicated overhead camera covering the transaction area.  542.43(s)(3) The surveillance system shall	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			transaction.  For Tiers B and C only, tThe
En 2 en tr	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.  For Tiers B and C only, the surveillance system shall provide		equipped with one (1) dedicated overhead camera covering the transaction area.  542.33(r)(3) The surveillance system shall provide an overview of cash transactions. This	equipped with one (1) dedicated overhead camera covering the transaction area.  542.43(s)(3) The surveillance system shall provide an overview of cash transactions. This	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			transaction.  For Tiers B and C only, tThe surveillance system shall provide an
Eact of the second seco	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.  For Tiers B and C only, the surveillance system shall provide an overview of cash transactions.		equipped with one (1) dedicated overhead camera covering the transaction area.  542.33(r)(3) The surveillance system shall provide an overview of cash transactions. This overview should include the customer, the	equipped with one (1) dedicated overhead camera covering the transaction area.  542.43(s)(3) <b>The surveillance system shall</b> provide an overview of cash transactions. This overview should include the customer, the	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			transaction.  For Tiers B and C only, the surveillance system shall provide an overview of cash transactions. This
2 e e o tr	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.  For Tiers B and C only, the surveillance system shall provide an overview of cash transactions.  This overview should include the		equipped with one (1) dedicated overhead camera covering the transaction area.  542.33(r)(3) The surveillance system shall provide an overview of cash transactions. This	equipped with one (1) dedicated overhead camera covering the transaction area.  542.43(s)(3) The surveillance system shall provide an overview of cash transactions. This	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			For Tiers B and C only, the surveillance system shall provide an overview of cash transactions. This overview should include the
2 or tr Fr su au 3 Ti cu	counter areas, and to confirm the amount of each cash transaction.  Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.  For Tiers B and C only, the surveillance system shall provide an overview of cash transactions.		equipped with one (1) dedicated overhead camera covering the transaction area.  542.33(r)(3) The surveillance system shall provide an overview of cash transactions. This overview should include the customer, the	equipped with one (1) dedicated overhead camera covering the transaction area.  542.43(s)(3) <b>The surveillance system shall</b> provide an overview of cash transactions. This overview should include the customer, the	equipped with one (1) dedicated overhead equipped with	h one (1) dedicated overhead			transaction.  For Tiers B and C only, the surveillance system shall provide an overview of cash transactions. This

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact REF	Recommended Revisions
KEF	Section 22 - Surveillance	372.23	372.33	342.43	Bulletin No. 2018-3	343	mai - State Compact	On-Hack wagening compact   REF	Recommended Revisions
	The cage or vault area in which				15(c)(6)(iii) The cage or vault area in which	543.21(c)(4)(iii) The cage or vault area in			
	exchange and transfer				exchange and transfer transactions occur must	=			
	transactions occur must be				be monitored and recorded by a dedicated	occur must be monitored and recorded by a			
	monitored and recorded by a				camera or motion activated dedicated camera	- I			
	dedicated camera or motion				that provides coverage with sufficient clarity to				
					_ · ·	·			
	activated dedicated camera that				identify the chip values and the amounts on	with sufficient clarity to identify the chip			
	provides coverage with sufficient				the exchange and transfer documentation.	values and the amounts on the exchange and			
	clarity to identify the chip values					e transfer documentation. Controls provided by			
4	and the amounts on the				and transfer system constitute an adequate	a computerized exchange and transfer system			
	exchange and transfer				alternative to viewing the amounts on the	constitute an adequate alternative to viewing			
	documentation. Controls				exchange and transfer documentation.	the amounts on the exchange and transfer			
	provided by a computerized					documentation.			
	exchange and transfer system								
	constitute an adequate alternative								
	to viewing the amounts on the								
	exchange and transfer								
	documentation.								
В	Fills and Credits		(s) Fills and credits.		İ				
	The cage or vault area in which			542.43(t)(1) The cage or vault area in which	İ				
	fills and credits are transacted			fills and credits are transacted shall be					
	shall be monitored and recorded			monitored and recorded by a dedicated					
	by a dedicated camera or motion			camera or motion activated dedicated camera					
	activated dedicated camera that			that provides coverage with sufficient clarity to					
1	provides coverage with sufficient			identify the chip values and the amounts on					
	clarity to identify the chip values			the fill and credit slips.					
			the iii and credit slips.	the iiii and credit slips.					
	and the amounts on the Fill and								
	Credit slips.								
	Controls provided by a		542.33(s)(2) Controls provided by a	542.43(t)(2) Controls provided by a					
	computerized fill and credit		-	computerized fill and credit system maybe					
_	system may be deemed an		deemed an adequate alternative to viewing the						
2	adequate alternative to viewing		fill and credit slips.	fill and credit slips.					
	the Fill and Credit slips.		illi alia creat siips.	illi alia creati siips.					
	the Fill and Credit slips.								
С	Currency and Coin	(o) Currency and coin.	(t) Currency and coin.	(u) Currency and coin.					
	For Tier A, the surveillance system	542.23(o) The surveillance system shall record a	542.33(t)(1) The surveillance system shall	542.43(u)(1)(2) The surveillance system shall	15(c)(7)(i) The surveillance system must	543.21(c)(5)(i) The surveillance system must			
	shall record a general overview of	general overview of all areas where currency or	monitor and record with sufficient clarity all	monitor and record with sufficient clarity all	monitor and record with sufficient clarity a	monitor and record with sufficient clarity a			
	all areas where currency or coin	coin may be stored or counted.	areas where currency or coin may be stored or	areas where currency or coin may be stored or	general overview of all areas where cash or	general overview of all areas where cash or			
	may be stored or counted. For	-	counted.	counted. (2) Audio capability of the soft	cash equivalents may be stored or counted;	cash equivalents may be stored or counted;			
	Tiers B and C only, the			count room shall also be maintained.	and	and			
	surveillance system shall monitor								
1	and record with sufficient clarity								
1	all areas where currency or coin								
	may be stored or counted. For								
	Tier C only, audio capability of the								
	soft count room shall also be								
	maintained.								
	For Tiers B and C only, the		542.33(t)(2) The surveillance system shall	542.43(u)(3) The surveillance system shall					
2	surveillance system shall provide		provide for:	provide for:					
	for:								
	Coverage of currency counters		542.33(t)(2)(i) Coverage of scales shall be	542.43(u)(3)(i) Coverage of scales shall be	15(c)(7)(ii) The surveillance system must	543.21(c)(5)(ii) The surveillance system must			
	shall be sufficiently clear to view		sufficiently clear to view any attempted	sufficiently clear to view any attempted	provide coverage of count equipment with	provide coverage of count equipment with			
	any attempted manipulation of		manipulation of the recorded data.	manipulation of the recorded data.	sufficient clarity to view any attempted	sufficient clarity to view any attempted			
а	the recorded data.				manipulation of the recorded data.	manipulation of the recorded data.			
. "									
	Monitoring and recording of the		542.33(t)(2)(ii) Monitoring and recording of the						
	table game drop box / financial		table game drop box storage rack or area by	the table game drop box storage rack or area					
	instrument storage component			by either a dedicated camera or a motion-					
b	storage rack or area by either a			detector activated camera.					
	dedicated camera or a motion								
	activated camera.								
		•	•		•				

REF		542.23	542.33	542.43	543 Guidance	543	Tribal - State Compact	Off-Track Wagering Compact	REF	Recommended Revisions
	Section 22 - Surveillance				Bulletin No. 2018-3		·			
	Monitoring and recording of soft		542.33(t)(2)(iv) Monitoring and recording of	542.43(u)(3)(iv) Monitoring and recording of						Monitoring and recording of soft
	count room, including all doors to		soft count room, including all doors to the	soft count room, including all doors to the						count room, including all doors to
	the room, all table game drop		room, all table game drop boxes, safes, and	room, all table game drop boxes, safes, and						the room, all table game drop box /
	box / financial instrument storage		counting surfaces, and all count team	counting surfaces, and all count team						financial casino instrument storage
	components, safes, and counting		personnel. The counting surface area must be	personnel. The counting surface area must be						components containers, safes, and
	surfaces, and all count team		continuously monitored and recorded by a	continuously monitored and recorded by a						counting surfaces, and all count
	personnel. The counting surface		dedicated camera during the soft count.	dedicated camera during the soft count.						team personnel. The counting
	area must be continuously		-							surface area must be continuously
	monitored and recorded by a									monitored and recorded by a
	dedicated camera during the soft									dedicated camera during the soft
	count.									count.
	Monitoring and recording of all		542.33(t)(2)(v) Monitoring and recording of all	542.43(u)(3)(v) Monitoring and recording of all						
	areas where currency is sorted,		areas where currency is sorted, stacked,	areas where currency is sorted, stacked,						
d	stacked, counted, verified, or		counted, verified, or stored during the soft	counted, verified, or stored during the soft						
	stored during the soft count		count process.	count process.						
	process.									
	Monitoring and recording of all		542.33(t)(2)(iii) Monitoring and recording of all							
	areas where coin may be stored		areas where coin may be stored or counted,	all areas where coin may be stored or counted,						
	or counted, including the hard		including the hard count room, all doors to the	including the hard count room, all doors to the						
	count room, all doors to the hard		11 3	hard count room, all scales and wrapping						
е	count room, all scales and		machines, and all areas where uncounted coin	machines, and all areas where uncounted coin						
	wrapping machines, and all areas		may be stored during the drop and count	may be stored during the drop and count						
	where uncounted coin may be		process.	process.						
	stored during the drop and count									
	process.									
	The surveillance system shall		542.33(u) <b>Change booths.</b> The surveillance	542.43(v) <i>Change booths.</i> The surveillance						
	monitor and record a general		system shall monitor and record a general	system shall monitor and record a general						
3	overview of the activities		overview of the activities occurring in each	overview of the activities occurring in each						
	occurring in each gaming		gaming machine change booth.	gaming machine change booth.						
	machine cashiers station.									

REF	CN TICS		542		NIGC Class III Guidance	543	Other Regs	REF Recommended
	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	BULLETIN 2018-3 §14	543.23		Revisions
23.1	Departmental Standards	542.22(a) Internal audit personnel.	542.32(a) Internal audit personnel.	542.42(a) Internal audit personnel.		543.23(c) Internal audit.		23.1 Departmental Standards
					14(c) Internal audit. Controls must be established and procedures implemented to ensure that:			Controls must be established and procedures implemented that, at a minimum, address the standards required within this section.  A
А	Internal auditor(s) report directly to the Cherokee Nation, CNGC, audit committee, or other entity designated by the Cherokee Nation.	report directly to the Tribe, Tribal gaming regulatory authority, audit committee, or other	report directly to the Tribe, Tribal gami regulatory authority, audit committee, or otl	nall 542.42(a)(2) The internal audit personnel shall ing report directly to the Tribe, Tribal gaming her regulatory authority, audit committee, or other with entity designated by the Tribe in accordance with the definition of internal audit in §542.2.	14(c)(3) Internal auditor(s) report directly to the Tribe, TGRA, audit committee, or other entity designated by the Tribe.	543.23(c)(3) Internal auditor(s) report directly to the Tribe, TGRA, audit committee, or other entity designated by the Tribe.	4C.N.C.A.§20. The Cherokee Nation Gaming Commission is hereby established as a part of the Executive Branch of government of the Nation in order to carry out the Nation's responsibilities under the IGRA	The internal audit personnel shall report directly to the CNGC and/or evaluate compliance on behalf of the CNGC, on all areas of regulatory oversight. Internal auditor(s)-report directly to the Cherokee Nation, CNGC, audit-committee, or other entity designated by the Cherokee Nation
В	For Tiers A and B gaming operations, a separate internal audit department must be maintained. Alternatively, designating personnel (who are independent with respect to the departments/procedures being examined) to perform internal audit work satisfies the requirements of this paragraph. For Tier C gaming operations, a separate internal audit department shall be maintained whose primary function is performing internal audit work and that is independent with respect to the departments subject to audit.		separate internal audit department must maintained. Alternatively, designating person (who are independent with respect to departments/procedures being examined)	be separate internal audit department shall be nel maintained whose primary function is performing the internal audit work and that is independent with to respect to the departments subject to audit.				For Tiers A and B gaming operations, a separate internal audit department must be maintained. Alternatively, designating personnel (who are independent with respect to the departments/procedures being examined) to perform internal audit work satisfies the requirements of this paragraph. For Tier C gaming operations, a separate internal audit department shall be maintained whose primary function is performing internal audit work and that is independent with respect to the departments subject to audit.
С	Internal auditor(s) are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation, officers of the CNGC, or outside CPA firm may perform this function).				14(c)(2) Internal auditor(s) are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation, officers of the TGRA, or outside CPA firm may perform this function).	543.23(c)(2)Internal auditor(s) are independent of gaming operations with respect to the departments subject to audit (auditors internal to the operation, officers of the TGRA, or outside CPA firm may perform this function).		Internal auditor(s) are independent of gaming operations, as defined in Section 1 - Definitions, with respect to the departments subject to audit (auditors internal to the operation, officers of the CNGC, or outside CPA firm may perform this function).
								An Independent CPA shall be engaged on an annual basis to perform "Agreed-Upon Procedures"; the CPA must determine compliance by the gaming operation with the D NIGC MICS, TICS, and SICS by testing the internal audit requirements set forth in part 23.8 of this section.
		Commission shall develop recommended Internal	connection with the internal audit testi pursuant to paragraph (b)(1) of this section, to Commission shall develop recommended Inter	In 542.42(g) <b>Internal Audit Guidelines</b> . In ing connection with the internal audit testing the pursuant to paragraph (b)(1) of this section, the mal Commission shall develop recommended Internal Audit Guidelines, which shall be available upon request. (Adopted August 12, 2005)				In connection with the internal audit testing requirements within this document, the NIGC has developed and recommends adhering to the published Internal Audit Guidelines, which are available upon request.
23.2	CPA Review of Internal Audit					543.23(d) Annual requirements.		23.2 CPA Review of Internal Audit
						543.23(d)(1) Agreed upon procedures. A CPA must be engaged to perform an assessment to verify whether the gaming operation is in compliance with these MICS, and/or the TICS or SICS if they provide at least the same level of controls as the MICS. The assessment must be performed in accordance with agreed upon procedures and the most recent versions of the Statements on Standards for Attestation Engagements and Agreed-Upon Procedures Engagements (collectively "SSAEs"), issued by the American Institute of Certified Public Accountants.  543.23(d)(2) The tribe must submit two copies of the agreed-upon procedures report to the Commission within 120 days of the gaming		
A	The CPA must determine compliance by the gaming operation with the internal audit requirements in Section 2.7(F) by:				The CPA must determine compliance by the gaming operation with the internal audit requirements in this paragraph (d) by: 14(d)(3)(i)			The CPA must determine compliance by the gaming- operation with the internal audit requirements in Section- 2.7(F) by:
	, , , , , , , , , , , , , , , , , , , ,					by:		

REF	CN TICS		542		NIGC Class III Guidance	543	Other Regs	REF Recommended
	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	BULLETIN 2018-3 §14	543.23		Revisions
1	Completing the internal audit checklist;					543.23(d)(3)(i)(A) Completing the internal audit		1 Completing the internal audit checklist;
	Ensuring that the internal auditor completed				14(d)(3)(i)(A) 14(d)(3)(i)(B) Ensuring that the internal auditor	checklist; 5/3 23/d)/3/ii/R) Encuring that the internal		Ensuring that the internal auditor completed chec
	checklists for each gaming department of the				=	auditor completed checklists for each gaming		each gaming department of the operation;
2	operation;					department of the operation;		2 cath gamming department of the operation,
	•					·		
3	Verifying that any areas of non-compliance have				14(d)(3)(i)(C) Verifying that any areas of non-	· · · · · · ·		Verifying that any areas of non-compliance have to
	been identified;				compliance have been identified;	compliance have been identified;		identified;
	Ensuring that audit reports are completed and				14(d)(3)(i)(D) Ensuring that audit reports are			Ensuring that audit reports are completed and inc
4	include responses from management; and				completed and include responses from	·		4 responses from management; and
,	Verifying that appropriate follow-up on audit				management; and 14(d)(3)(i)(E) Verifying that appropriate follow-up	management; and 543 23(d)(3)(i)(F) Verifying that appropriate		Verifying that appropriate follow-up on audit find
	findings has been conducted and necessary				on audit findings has been conducted and			been conducted and necessary corrective measure
5	corrective measures have been taken to				necessary corrective measures have been taken			5 been taken to effectively mitigate the noted risks.
	effectively mitigate the noted risks.					taken to effectively mitigate the noted risks.		, ,
					-			
	If the CPA determines that the internal audit				14(d)(3)(ii) If the CPA determines that the			If the CPA determines that the internal audit process
	procedures performed during the fiscal year have				internal audit procedures performed during the	I		performed during the fiscal year have been prope
. !	been properly completed, the CPA may rely on				fiscal year have been properly completed, the			completed, the CPA may rely on the work of the in
	the work of the internal audit for the completion				CPA may rely on the work of the internal audit	1		B audit for the completion of the MICS checklists as
	of the MICS checklists as they relate to the				for the completion of the MICS checklists as they	I		relate to the standards covered by this part.
1	standards covered by this part.				relate to the standards covered by this part.	relate to the standards covered by this part.		
3.3	Audits	542.22(b) Audits.	542.32(b) Audits.	542.22(b) Audits.	14(C) Internal audit	543.23(c) Internal audit.		23.3 2 Audits
	Controls must be established and procedures	542.22(b)(1) Internal audit personnel shall	542.32(b)(1) Internal audit personnel shall	542.42(b)(1) Internal audit personnel shall	14(c)(1) Internal auditor(s) perform audits of each	543.23(c)(1) Internal auditor(s) perform audits of		Controls must be established and procedures
li	implemented to ensure that Internal auditor(s)	perform audits of all major gaming areas of the	perform audits of all major gaming areas of the	perform audits of all major gaming areas of the	department of a gaming operation, at least	each department of a gaming operation, at least		implemented to ensure that Internal auditor(s) pe
	perform audits of all major gaming areas of the	gaming operation. The following shall be	gaming operation. The following shall be	gaming operation. The following shall be	annually, to review compliance with the TICS,	annually, to review compliance with the TICS,		shall perform audits of all major gaming areas of t
	gaming operation, including each department of	reviewed at least annually:	reviewed at least annually:	reviewed at least annually:	SICS, and these MICS, which include at least the	SICS, and these MICS, which include at least the		gaming operation, including each department of a
	a gaming operation, at least annually, to review				following areas:	following areas:		A operation, at least annually, to review compliance
	compliance with TICS, SICS, and the NIGC MICS,							TICS, SICS, and the NIGC MICS, which include at le
'	which include at least the following areas:							following areas:
T	Bingo - including, but not limited to: Supervision,	542.22(b)(1)(i) Bingo, including but not limited to,	542.32(b)(1)(i) Bingo, including but not limited to,	542.42(b)(1)(i) Bingo, including but not limited to,		543.23(c)(1)(i) Bingo, including supervision, bingo		Bingo - including, but not limited to: Supervision,
	bingo card control, bingo sales, draw, electronic			bingo card control, payout procedures, and cash		cards, bingo card sales, draw, prize payout; cash		card control, bingo sales, draw, electronic
	equipment/aids, payout procedures, cash and		reconciliation process;	reconciliation process;		and cash equivalent controls, technologic aids to		equipment/technologic aids, payout procedures, o
٠ ,	cash equivalent controls, operations, vouchers,	·		·		the play of bingo, operations, vouchers, and		cash equivalent controls, operations, vouchers, an
- 1	and revenue audit procedures.					revenue audit procedures;		revenue audit procedures;
_								
	Pull tabs -including, supervision, pull tab	=	_	542.42(b)(1)(ii) Pull tabs, including but not limited		543.23(c)(1)(ii) Pull tabs, including, supervision,		Pull tabs -including, but not limited to, supervision
.	inventory, pull tab sales, winning pull tabs, pull			to, statistical records, winner verification,		pull tab inventory, pull tab sales, winning pull		tab inventory, pull tab sales, accountability of sale
	tab operating funds, statistical records, and		F	perpetual inventory, and accountability of sales		tabs, pull tab operating funds, statistical records,		inventory, winning pull tabs (winner verification), p
ľ	revenue audit procedures.	versus inventory;	versus inventory;	versus inventory;		and revenue audit procedures;		operating funds, statistical records, and revenue a procedures:
	Card games - including supervision, exchange or	542.22(b)(1)(iii) Card games, including but not	542.32(b)(1)(iii) Card games, including but not	542.42(b)(1)(iii) Card games, including but not		543.23(c)(1)(iii) Card games, including		Card games - including supervision, card games
- 1	3			limited to, card games operation, cash exchange		supervision, exchange or transfers, playing cards,		operations, exchange or transfers, playing cards, s
				procedures, shill transactions, and count		shill funds, reconciliation of card room bank,		funds, reconciliation of card room bank, posted ru
	promotional progressive pots and pools.	procedures;	procedures;	procedures;		posted rules, and promotional progressive pots		promotional progressive pots and pools;
						and pools;		-
+	Pari-Mutuel Wagering – including, but not	542 22(h)(1)(v) Pari-mutual wagering including	542 32(h)(1)(v) Pari-mutual wagering including	542.42(b)(1)(v) Pari-mutual wagering, including	14(c)(1)(ii) Pari-mutuel including supervision			Pari-Mutuel Wagering – including, but not limited
				write and payout procedures, and pari-mutual				supervision, exemptions, betting ticket and equip
			auditing procedures;	auditing procedures;	standards, payout standards, check-out			standards, write and payout procedures, check-or
ľ	g procedures.	g processor,	g procedures,	procedures,	standards, and computer report standards;			standards, computer report standards, and pari-m
					,,			auditing procedures.
T	Table games - including but not limited to, fill	542.22(b)(1)(vi) Table games, including but not	542.32(b)(1)(vi) Table games, including but not	542.42(b)(1)(vi) Table games, including but not	14(c)(1)(iii) Table games, including supervision, fill			Table games - including but not limited to, superv
	and credit procedures, pit credit play procedures,	limited to, fill and credit procedures, pit credit	limited to, fill and credit procedures, pit credit	limited to, fill and credit procedures, pit credit	and credit procedures, table inventory forms,			and credit procedures, table inventory forms, pit of
	rim credit procedures, drop/count procedures	play procedures, rim credit procedures, soft	play procedures, rim credit procedures, soft	play procedures, rim credit procedures, soft	standards for playing cards and dice, plastic			play procedures, including, rim credit procedures,
		drop/count procedures and the subsequent	drop/count procedures and the subsequent	drop/count procedures and the subsequent	cards, analysis of table games performance,			credit play, name credit instruments, call bets, as v
	2	transfer of funds, unannounced testing of count	transfer of funds, unannounced testing of count	transfer of funds, unannounced testing of count	marker credit play, name credit instruments, call			foreign currency, drop/count procedures and the
		room currency counters and/or currency	room currency counters and/or currency	room currency counters and/or currency	bets, rim credit, and foreign currency;			subsequent transfer of funds, unannounced testin
- 1			interface, location and control over sensitive	interface, location and control over sensitive				5 count room currency counters and/or currency
	documents to summarized documentation and	_	keys, the tracing of source documents to	keys, the tracing of source documents to				interface, standards for playing cards and dice, pla
		summarized documentation and accounting	summarized documentation and accounting	summarized documentation and accounting				cards, analysis of table games performance, locati
,	accounting records, and reconciliation to	_		_		l		
,	_	_	records, and reconciliation to restricted copies;	records, and reconciliation to restricted copies;				control over sensitive keys, the tracing of source
,	_	_		_				control over sensitive keys, the tracing of source documents to summarized documentation and ac records, and reconciliation to restricted copies;

DEE	CN TICS		542		NICC Class III Cuidanes	543	Other Dees	REF	Documended	
KEF	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	NIGC Class III Guidance BULLETIN 2018-3 §14	543.23	Other Regs	KEF	Recommended Revisions	
		· · ·		, ,	-			Carri		
	Gaming machines, including but not limited to,	542.22(b)(1)(vii) Gaming machines, including but	542.32(b)(1)(vii) Gaming machines, including but	542.42(b)(1)(vii) Gaming machines, including but	14(c)(1)(iv) Gaming machines, including	543.23(c)(1)(i) Bingo, including supervision, bingo		1	ing machines - including but not limited t	
	jackpot payout and gaming machine fill	not limited to, jackpot payout and gaming	not limited to, jackpot payout and gaming	not limited to, jackpot payout and gaming	supervision, access listing, prize payout and fills,	cards, bingo card sales, draw, prize payout; cash			rvision, access listing, gaming machine/pla	
	procedures, gaming machine drop/count and bill	machine fill procedures, gaming machine	machine fill procedures, gaming machine	machine fill procedures, gaming machine	cash and cash equivalent controls, gaming	and equivalent controls, technologic aids to the		1	face operations, manual prize jackpot payo	-
	acceptor drop/count and subsequent transfer of	drop/count and bill acceptor drop/count and	drop/count and bill acceptor drop/count and	drop/count and bill acceptor drop/count and	machine components, operations, vouchers,	play of bingo, operations, vouchers, and revenue		I I	ing machine fill procedures, cash and cash	
	funds, unannounced testing of count room	subsequent transfer of funds, unannounced	subsequent transfer of funds, unannounced	subsequent transfer of funds, unannounced	standards for evaluating theoretical and actual	audit procedures;		contro	rols, gaming machine components, standa	ards for
	currency counters and/or currency interface,	testing of weigh scale and weigh scale interface,	testing of weigh scale and weigh scale interface,	testing of weigh scale and weigh scale interface,	hold percentages, gaming machine drop and			evalua	uating theoretical and actual hold percenta	:ages, in-
	gaming machine drop cabinet access, tracing of	unannounced testing of count room currency	unannounced testing of count room currency	unannounced testing of count room currency	hopper contents standards, in-house progressive			house	e progressive gaming machine standards,	, wide-area
	source documents to summarized	counters and/or currency interface, gaming	counters and/or currency interface, gaming	counters and/or currency interface, gaming	gaming machine standards, wide-area			progr	ressive gaming machine standards, accour	unt access
	documentation and accounting records,	machine drop cabinet access, tracing of source	machine drop cabinet access, tracing of source	machine drop cabinet access, tracing of source	progressive gaming machine standards, and			cards	s, gaming machine drop/count and bill acc	:ceptor
	reconciliation to restricted copies, location and	documents to summarized documentation and	documents to summarized documentation and	documents to summarized documentation and	account access cards;			drop/	/count and subsequent transfer of funds,	F .
	control over sensitive keys, compliance with	accounting records, reconciliation to restricted	accounting records, reconciliation to restricted	accounting records, reconciliation to restricted				unanr	inounced testing of count room currency o	-counters-
6	EPROM duplication procedures, and compliance	copies, location and control over sensitive keys,	copies, location and control over sensitive keys,	copies, location and control over sensitive keys,				6 and/o	or currency interface, gaming machine dro	rop cabinet
	with MICS procedures for gaming machines that	compliance with EPROM duplication procedures,		compliance with EPROM duplication procedures,					ss, tracing of source documents to summa	
	accept currency or coin(s) and issue cash-out	and compliance with MICS procedures for	and compliance with MICS procedures for	and compliance with MICS procedures for				1	mentation and accounting records, recond	
	tickets or gaming machines that do not accept	gaming machines that accept currency or coin(s)							icted copies, location and control over sen	
	currency or coin(s) and do not return currency or			and issue cash-out tickets or gaming machines					pliance with EPROM duplication procedure	-
	-	and issue cash-out tickets or gaming machines	and issue cash-out tickets or gaming machines					1 1		
	coin(s).	that do not accept currency or coin(s) and do not		that do not accept currency or coin(s) and do not				1	fication and approval of games/technologi	_
		return currency or coin(s);	return currency or coin(s);	return currency or coin(s);					her/cash-out tickets and compliance with	
								I I	edures for gaming machines that accept cu	-
									s) and issue cash-out tickets or gaming ma	
								do no	ot accept currency or coin(s) and do not re	eturn
								curre	ency or coin(s);	
	Cage, credit, vault, cash and cash equivalent	542.22(b)(1)(viii) Cage and credit procedures	542.32(b)(1)(viii) Cage and credit procedures	542.42(b)(1)(viii) Cage and credit procedures	14(c)(1)(x) Cage, vault, cash and cash equivalent	543.23(c)(1)(ix) Cage, vault, cash and cash		Cage	e - including, credit, vault, cash and cash ed	equivalent
	procedures, including supervision, cash and cash	including all cage, credit, and collection	including all cage, credit, and collection	including all cage, credit, and collection	procedures, including supervision, cash and cash	equivalent procedures, including supervision,		proce	edures, <del>including</del> supervision, cash and cas	ash
	equivalents, personal checks, cashier's checks,	procedures, and the reconciliation of trial	procedures, and the reconciliation of trial	procedures, and the reconciliation of trial	equivalents, personal checks, cashier's checks,	cash and cash equivalents, personal checks,			valents, personal checks, cashier's checks, t	
	traveler's checks, payroll checks, and counter	balances to physical instruments on a sample	balances to physical instruments on a sample	balances to physical instruments on a sample	traveler's checks, payroll checks, and counter	cashier's checks, traveler's checks, payroll checks,			ks, payroll checks, and counter checks, cag	
	checks, cage and vault accountability, kiosks,	basis. Cage accountability shall be reconciled to	1	basis. Cage accountability shall be reconciled to	checks, cage and vault accountability, kiosks,	and counter checks, cage and vault			untability, kiosks, patron deposited funds,	_
	patron deposited funds, promotional payouts,	the general ledger;	the general ledger;	the general ledger;	patron deposited funds, promotional payouts,	accountability, kiosks, patron deposited funds,			notional payouts, drawings, and giveaway p	
7	drawings, and giveaway programs, chip and	the general leager,	the general leager,	the general leager,	drawings, and giveaway programs, chip and	promotional payouts, drawings, and giveaway		- I	and token standards, cage and vault acces	
								1 1 1		
	token standards, cage and vault access, and				token standards, and cage and vault access;	programs, chip and token standards, and cage			ction procedures; and the reconciliation of	
	collection procedures; and the reconciliation of					and vault access;		1	nces to physical instruments on a sample b	_
	trial balances to physical instruments on a							accou	untability shall be reconciled to the genera	ral ledger;
	sample basis. Cage accountability shall be									
	reconciled to the general ledger.									
-	Information technology functions, including	542.22(b)(1)(ix) Information technology functions,	5/12 32(b)(1)(iv) Information technology functions	, 542.42(b)(1)(ix) Information technology functions	14(c)(1)(vi) Information technology, including	543.23(c)(1)(x) Information technology, including		Inform	mation technology - <del>functions,</del> including n	review for
	review for compliance with information	including review for compliance with information		<u></u>	supervision, system' logical and physical controls,			1	pliance with information technology stand	
	-	I -						1 1	<del></del>	
	technology standards, supervision, gaming	technology standards;	technology standards;	technology standards;		physical controls, independence, physical		1 1	rvision, gaming systems' logical and physic	
	systems' logical and physical controls,				user controls, installations and/or modifications,	security, logical security, user controls,			pendence, physical security, logical security	-
8	independence, physical security, logical security,				remote access, incident monitoring and	installations and/or modifications, remote access,		0	rols, installations and/or modifications, rem	
	user controls, installations and/or modifications,				reporting, data back-ups, software downloads,	incident monitoring and reporting, data back-			ent monitoring and reporting, data back-u	
	remote access, incident monitoring and				and verifying downloads; and	ups, software downloads, and verifying		softw	vare downloads, and verifying downloads.	•
	reporting, data back-ups, software downloads,					downloads; and				
	and verifying downloads.									
	Gaming promotions and player tracking				14(c)(1)(v) Caming promotions and player	542 22(c)(1)(ii) Gaming promotions and places		<del>                                      </del>		
	Gaming promotions and player tracking				14(c)(1)(v) Gaming promotions and player	543.23(c)(1)(iv) Gaming promotions and player				
9	procedures, including supervision, gaming				tracking procedures, including supervision,	tracking procedures, including supervision,				
	promotion rules and player tracking systems.				gaming promotion rules and player tracking	gaming promotion rules and player tracking				
	Compliance to the second secon	F42 22/b/(1)/c) Cli	[42 22(h)/1)/.) Compliment (1)	[42 42/h)/1)/.) Cli	systems;	systems;				
1	Complimentary services or items, including	542.22(b)(1)(x) Complimentary service or item,	542.32(b)(1)(x) Complimentary service or item,	542.42(b)(1)(x) Complimentary service or item,	14(c)(1)(vi) Complimentary services or items,	543.23(c)(1)(v) Complimentary services or items,				
10	procedures for issuing, authorizing, redeeming,	including but not limited to, procedures whereby	-	including but not limited to, procedures whereby	including procedures for issuing, authorizing,	including procedures for issuing, authorizing,				
10	and reporting complimentary service items.	complimentary service items are issued,	complimentary service items are issued,	complimentary service items are issued,		redeeming, and reporting complimentary service				
		authorized, and redeemed; and	authorized, and redeemed; and	authorized, and redeemed; and	items;	items;				
<u></u>	D				1 4/ V/4 V 12 B	542.224.7474.7.7.7.				
	Patron deposit accounts and cashless systems				14(c)(1)(vii) Patron deposit accounts and cashless					
	procedures, including supervision, patron deposit				systems procedures, including supervision,	cashless systems procedures, including				
11	accounts and cashless systems, as well as patron				II.	supervision, patron deposit accounts and				
1	deposits, withdrawals and adjustments.				well as patron deposits, withdrawals and	cashless systems, as well as patron deposits,				
		•			adjustments:	withdrawals and adiustments:		1 1		

RE	CN TICS		542		NIGC Class III Guidance	543	Other Regs	REF	Recommended
	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	BULLETIN 2018-3 §14	543.23	- mer negs		Revisions
	Drop and count standards, including supervision,	Card games, including but not limited to, and	Card games, including but not limited to, and		14(c)(1)(ix) Drop and count standards, including	543.23(c)(1)(viii) Drop and count standards,			Drop and count standards - including supervision, count
	count room access, count team, card game drop	count procedures; (see Card Games in row	count procedures; (see Card Games above)	count procedures; (see Card Games above)	supervision, count room access, count team,	including supervision, count room access, count			room access, count team, table game drop standards, care
	standards, gaming machine and financial	24.3(B)(3) above.) 542.22(b)(1)(iii)	542.32(b)(1)(iii)	542.42(b)(1)(iii)	table game drop standards, gaming machine and	team, card game drop standards, player interface			game drop standards, gaming machine/player interface
	instrument drop standards, card game count	Table games, including but not limited to, soft	Table games, including but not limited to, soft	Table games, including but not limited to, soft	financial instrument drop standards, table game	and financial instrument drop standards, card			and financial instrument drop standards, table game coun
	standards, gaming machine financial instrument	drop/count procedures and the subsequent	drop/count procedures and the subsequent	drop/count procedures and the subsequent	count standards, gaming machine financial	game count standards, player interface financial			standards, card game count standards, gaming
	count standards, and controlled keys.	transfer of funds, unannounced testing of count	transfer of funds, unannounced testing of count	transfer of funds, unannounced testing of count	instrument count standards, collecting currency	instrument count standards, collecting currency			machine/player interface financial instrument count
		room currency counters and/or currency	room currency counters and/or currency	room currency counters and/or currency	cassettes and financial instrument storage	cassettes and financial instrument storage			standards, collecting currency cassettes and financial
		interface, location and control over sensitive	interface, location and control over sensitive	interface, location and control over sensitive	components from kiosks, kiosk count standards,	components from kiosks, kiosk count standards,			instrument storage components from kiosks, kiosk count
		keys, (see Table Games in row 24.3(B)(5))	keys, (see Table Games in row 24.3(B)(5))	keys, (see Table Games in row 24.3(B)(5))	and controlled keys;	and controlled keys; (Updated 12/21/2018)			standards, and controlled keys.
12		542.22(b)(1)(vi)	542.32(b)(1)(vi)	542.42(b)(1)(vi)				12	
		Gaming machines, including but not limited	Gaming machines, including but not limited	Gaming machines, including but not limited					
		to, gaming machine drop/count and bill	to, gaming machine drop/count and bill	to, gaming machine drop/count and bill					
		acceptor drop/count and subsequent transfer of		acceptor drop/count and subsequent transfer of					
		funds, unannounced testing of count room	funds, unannounced testing of count room	funds, unannounced testing of count room					
		currency counters and/or currency	currency counters and/or currency	currency counters and/or currency					
		interface,gaming machine drop cabinet access,	interface,gaming machine drop cabinet access,	interface,gaming machine drop cabinet access,					
		location and control over sensitive keys, (See	location and control over sensitive keys, (See	location and control over sensitive keys, (See					
		Gaming Machines in row 24.3(B)(6) above.)	Gaming Machines in row 24.3(B)(6) above.)	Gaming Machines in row 24.3(B)(6) above.)					
		542.22(b)(1)(vii)	542.32(b)(1)(vii)	542.42(b)(1)(vii)					
	Accounting – including, but not limited to:				14(c)(1)(xii) Accounting standards, including	543.23(c)(1)(xi) Accounting standards, including			
13	Accounting records, maintenance and				accounting records, maintenance and	accounting records, maintenance and			
1	preservation of financial records and relevant				preservation of financial records and relevant	preservation of financial records and relevant			
	supporting documentation.				supporting documentation.	supporting documentation.			
	Keno, including but not limited to, game write	542.22(b)(1)(iv) Keno, including but not limited	542.22(b)(1)(iv) Keno, including but not limited	542.22(b)(1)(iv) Keno, including but not limited	14(c)(1)(i) Keno, including supervision, game play				Keno, including but not limited to, supervision, game play
	and payout procedures, sensitive key location	to, game write and payout procedures, sensitive	to, game write and payout procedures, sensitive	to, game write and payout procedures, sensitive	standards, rabbit ear or wheel system, random				standards, rabbit ear or wheel system, random number
	and control, and a review of keno auditing	key location and control, and a review of keno	key location and control, and a review of keno	key location and control, and a review of keno	number generator, prize payout, cash and cash				generator, game write and payout procedures, cash and
14	procedures.	auditing procedures;	auditing procedures;	auditing procedures;	equivalents, promotional payouts or awards,				cash equivalents, promotional payouts or awards,
14					statistical reports, system security,				statistical reports, system security, documentation,
					documentation, equipment, document retention,				equipment, document retention, multi-race tickets, and
					multi-race tickets, and manual keno;				manual keno, sensitive key location and control, and a
									review of keno auditing procedures;
	Lines of credit procedures, if applicable, including				14(c)(1)(viii) Lines of credit procedures, including	543.23(c)(1)(vii) Lines of credit procedures,			Lines of credit procedures, if applicable, including
15	establishment of lines of credit policy.				the establishment of lines of credit policy;	including establishment of lines of credit policy;			establishment of lines of credit policy;
	Any other internal audits as required by the	542.22(b)(1)(xi) Any other internal audits as	542.32(b)(1)(xi) Any other internal audits as	542.42(b)(1)(xi) Any other internal audits as			4C.N.C.A§20 The Cherokee Nation Gaming		Any other internal audits as required by the Cherokee
1.0	Cherokee Nation, CNGC, audit committee, or	required by the Tribe, Tribal gaming regulatory	required by the Tribe, Tribal gaming regulatory	required by the Tribe, Tribal gaming regulatory			Commission is hereby established as a part of	1.0	Nation, CNGC, audit committee, or other entity designated
10	other entity designated by the Cherokee Nation.	authority, audit committee, or other entity	authority, audit committee, or other entity	authority, audit committee, or other entity			the Executive Branch of government of the	10	by the Cherokee Nation.
		designated by the Tribe.	designated by the Tribe.	designated by the Tribe.			Nation in order to carry out the Nation's responsibilities under the IGRA		
	In addition to the observation and examinations	542.22(b)(2) In addition to the observations and	542.32(b)(2) In addition to the observations and	542.42(b)(2) In addition to the observations and	14(c)(8) Follow-up observations and	543.23(c)(8) Follow-up observations and	responsibilities under the IGRA		
	performed under paragraph (A) of this section,	examinations performed under paragraph (b)(1)	examinations performed under paragraph (b)(1)	examinations performed under paragraph (b)(1)	examinations is performed to verify that	examinations is performed to verify that			
	follow-up observations and examinations shall be		of this section, follow-up observations and	of this section, follow-up observations and	corrective action has been taken regarding all	corrective action has been taken regarding all			
	performed to verify that corrective action has	examinations shall be performed to verify that	examinations shall be performed to verify that	examinations shall be performed to verify that	instances of non-compliance. The verification is	instances of non-compliance. The verification is			
	been taken regarding all instances of	corrective action has been taken regarding all	corrective action has been taken regarding all	corrective action has been taken regarding all	performed within six (6) months following the	performed within six (6) months following the			
В	noncompliance cited by internal audit, the	instances of noncompliance cited by internal	instances of noncompliance cited by internal	instances of noncompliance cited by internal	date of notification of non-compliance.	date of notification of non-compliance.			
	independent accountant, and/or the NIGC. The	audit, the independent accountant, and/or the	audit, the independent accountant, and/or the	audit, the independent accountant, and/or the	·				
	verification shall be performed within six (6)	Commission. The verification shall be performed	Commission. The verification shall be performed	Commission. The verification shall be performed					
	months following the date of notification.	within six (6) months following the date of	within six (6) months following the date of	within six (6) months following the date of					
		notification.	notification.	notification.					
	Whenever possible internal audit observations	542.22(b)(3) Whenever possible, internal audit	5/12/32/(h)(3) Whenever possible internal audit	542.42(b)(3) Whenever possible, internal audit					Whenever possible internal audit observations shall be
	Whenever possible, internal audit observations shall be performed on an unannounced basis	observations shall be performed on an	542.32(b)(3) Whenever possible, internal audit observations shall be performed on an	observations shall be performed on an					Whenever possible, internal audit observations shall be performed on an unannounced basis (i.e., without the
	(i.e., without the employees being forewarned	unannounced basis (i.e., without the employees	unannounced basis (i.e., without the employees	unannounced basis (i.e., without the employees					employees being forewarned that their activities will be
	that their activities will be observed).	being forewarned that their activities will be	being forewarned that their activities will be	being forewarned that their activities will be					observed). Additionally, if the independent accountant also
		_	obsserved). Additionally, if the independent	obsserved). Additionally, if the independent					performs the internal audit function, the accountant shall
	performs the internal audit function, the	accountant also performed the internal audit	accountant also performed the internal audit	accountant also performed the internal audit					perform separate unannounced observations of the table
	accountant shall perform separate observations	function, the accountant shall perform separate	function, the accountant shall perform separate	function, the accountant shall perform separate					games/gaming machine drops and counts to satisfy the
		observations of the table games/gaming	observations of the table games/gaming	observations of the table games/gaming					internal audit observation requirements "Agreed-Upon
	counts to satisfy the internal audit observation	machine drops and counts to satisfy the internal		machine drops and counts to satisfy the internal					Procedures" engagement and independent accountant
C	requirements and independent accountant tests	audit observation requirements and independent		audit observation requirements and independent				C	tests of controls as required by the American Institute of
	of controls as required by the American Institute	accountant tests of controls as required by the	accountant tests of controls as required by the	accountant tests of controls as required by the					Certified Public Accountants guide. and as required in
	of Certified Public Accountants guide.	American Institute of Certified Public	American Institute of Certified Public	American Institute of Certified Public					Section 2 – Compliance, CPA Testing.
	3	Accountants guide.	Accountants guide.	Accountants guide.					
				_					

REF	CN TICS		542		NIGC Class III Guidance	543	Other Regs	REF Recommended
	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	BULLETIN 2018-3 §14	543.23		Revisions
		542.3(f)(3)(ii) Agreed-upon procedures are to be				543.23(c)(1) Internal auditor(s) perform audits of		Annual compliance/regulatory audits must encompass
		performed by the CPA to determine that the				each department of a gaming operation, at least		portion or all of the most recent business year.
		internal audit procedures performed for a past 12				annually, to review compliance with the TICS,		
		month period (includes two 6-month periods)				SICS, and these MICS, which include at least the		
		encompassing a portion or all of the most recent				following areas:		
		business year has been properly completed.						
		business year has been properly completed.						D
3.4 г	Occumentation	542.22(c) Documentation.	542.32(c) Documentation.	542.42(c) Documentation.				23.3 Documentation
	Occumentation such as checklists, programs,	542.22(c)(1) Documentation (e.g., checklists,	542.32(c)(1) Documentation (e.g., checklists,	542.42(c)(1) Documentation (e.g., checklists,	14(c)(4) Documentation such as checklists,	543.23(c)(4) Documentation such as checklists,		Documentation such as checklists, programs, reports, et
	eports, etc. is prepared to evidence all internal	programs, reports, etc.) shall be prepared to	programs, reports, etc.) shall be prepared to	programs, reports, etc.) shall be prepared to		programs, reports, etc. is prepared to evidence al	n	must be is prepared to evidence all internal audit work
		F	evidence all internal audit work performed as it	evidence all internal audit work performed as it		internal audit work and follow-up performed as i		the follow-up performed as it relates to compliance wit
	o compliance with TICS, SICS, and these MICS,	relates to the requirements in this section,	relates to the requirements in this section,	relates to the requirements in this section,	relates to compliance with TICS, SICS, and these	relates to compliance with TICS, SICS, and these		TICS, SICS, and these NIGC MICS, including all instances
	-	•	I -			•		_
-	ncluding all instances of noncompliance.	including all instances of noncompliance.	including all instances of noncompliance.	including all instances of noncompliance.	MICS, including all instances of noncompliance.	MICS, including all instances of noncompliance.		noncompliance. All steps described in documentation of
4								A audit work must be initialed or signed by an internal au
		542.3(f)(3)(ii)(A)testing procedures were						representative.
		included in the internal audit work-papers and all						
		steps described in the checklists were initialed or						
		signed by an internal audit representative.						
	The internal audit department shall operate with	542.22(c)(2) The internal audit department shall	542.32(c)(2) The internal audit department shall	542.42(c)(2) The internal audit department shall				
	nudit programs, which, at a minimum, address	operate with audit programs, which, at a	operate with audit programs, which, at a	operate with audit programs, which, at a				
t	he MICS. Additionally, the department shall	minimum, address the MICS. Additionally, the	minimum, address the MICS. Additionally, the	minimum, address the MICS. Additionally, the				The internal audit department shall operate with audit
F	properly document the work performed, the	department shall properly document the work	department shall properly document the work	department shall properly document the work				programs, which, at a minimum, address the MICS.
C	conclusions reached, and the resolution of all	performed, the conclusions reached, and the	performed, the conclusions reached, and the	performed, the conclusions reached, and the				
e	exceptions. Institute of Internal Auditors	resolution of all exceptions. Institute of Internal	resolution of all exceptions. Institute of Internal	resolution of all exceptions. Institute of Internal				Additionally, the department Internal audit shall properly
S	tandards are recommended but not required.	Auditors standards are recommended but not	Auditors standards are recommended but not	Auditors standards are recommended but not				document the work performed, the conclusions reached
		required.	required.	required.				and the resolution of all exceptions. Institute of Internal
		·	•	·				Auditors standards are recommended but not required.
	Reports	542.22(d) <i>Reports</i> .	542.32(d) Reports.	542.42(d) Reports.				23.4 Reports
	Reports documenting audits performed shall be	542.22(d)(1) Reports documenting audits	542.32(d)(1) Reports documenting audits	542.42(d)(1) Reports documenting audits	14(c)(5) Audit reports are maintained and made	543.23(c)(5) Audit reports are maintained and		
<sub>Α</sub>  r	naintained and made available to the NIGC,	performed shall be maintained and made	performed shall be maintained and made	performed shall be maintained and made	available to the Commission upon request and	made available to the Commission upon request		
ι	ipon request.	available to the Commission upon request.	available to the Commission upon request.	available to the Commission upon request.	must include the following information:	and must include the following information:		
ь	Such audit reports shall include the following	542.22(d)(2) Such audit reports shall include the	542.32(d)(2) Such audit reports shall include the	542.42(d)(2) Such audit reports shall include the				
	nformation:	following information:	following information:	following information:	44/3/53/53 4 15: 15: 15	E 42 227 VEVO A - Pr L 1 r 1		
	Audit objectives;	542.22(d)(2)(i) Audit objectives;	542.32(d)(2)(i) Audit objectives;	542.42(d)(2)(i) Audit objectives;	14(c)(5)(i) Audit objectives;	543.23(c)(5)(i) Audit objectives;		
? /	Audit procedures and scope;	542.22(d)(2)(ii) Audit procedures and scope;	542.32(d)(2)(ii) Audit procedures and scope;	542.42(d)(2)(ii) Audit procedures and scope;	14(c)(5)(ii) Audit procedures and scope;	543.23(c)(5)(ii) Audit procedures and scope;		
	indings and conclusions; Recommendations, if applicable; and,	542.22(d)(2)(iii) Findings and conclusions; 542.22(d)(2)(iv) Recommendations, if applicable;	542.32(d)(2)(iii) Findings and conclusions; 542.32(d)(2)(iv) Recommendations, if applicable;	542.42(d)(2)(iii) Findings and conclusions; 542.42(d)(2)(iv) Recommendations, if applicable;	14(c)(5)(iii) Findings and conclusions; 14(c)(5)(iv) Recommendations, if applicable; and	543.23(c)(5)(iii) Findings and conclusions; 543.23(c)(5)(iv) Recommendations, if applicable;		
+		and	and	and		and		
	Management's response.	542.22(d)(2)(v) Management's response.	542.32(d)(2)(v) Management's response.	542.42(d)(2)(v) Management's response.	14(c)(5)(v) Management's response.	543.23(c)(5)(v) Management's response.		
	Audit reports and supporting documentation	542.19(k)(1) All original books, records and						Audit reports and supporting documentation shall be
S	hall be retained for a period of three (3) years.	documents pertaining to the conduct of						retained for a period of three (3) five (5) years.
		wagering activities shall be retained by a gaming					Destruction of Documents. Enterprise books,	
		operation in accordance with the following					records and other materials documenting the	
		schedule. A record that summarizes gaming					conduct of covered games shall be destroyed	
		transactions is sufficient, provided that all					only in accordance with rules and regulations	
		documents containing an original signature(s)					adopted by the TCA, which at a minimum shall	
		attesting to the accuracy of a gaming related						
							provide as follows: (3) Notwithstanding anything	
		transaction are independently preserved. Original					herein to the contrary, all enterprise books and	
		books, records or documents shall not include					records with respect to the conduct of covered	C
		copies of originals, except for copies that contain					games or the operation of the enterprise,	
		original comments or notations on parts of multi-					including, but not limited to, all interim and final	
		part forms. The following original books, records					financial and audit reports and materials related	
		and documents shall be retained by a gaming					thereto which have been generated in the	
		operation for a minimum of five (5) years:					ordinary course of business, shall be maintained	
		(viii) Internal audit documentation and reports;					for the minimum period of three (3) years.	
		1					5(K)(3)	
					•	į	1	i
	Material Exceptions	542.22(e) Material exceptions.	542.32(e) Material exceptions.	542.42(e) Material exceptions.				23.5
	Material Exceptions All material exceptions resulting from internal	542.22(e) Material exceptions. 542.22(e) All material exceptions resulting from	542.32(e) <i>Material exceptions</i> . 542.32(e) All material exceptions resulting from	542.42(e) <i>Material exceptions</i> . 542.42(e) All material exceptions resulting from	14(c)(6) All material exceptions identified by	543.23(c)(6) All material exceptions identified by		23.5
A			•		14(c)(6) All material exceptions identified by internal audit work are investigated and resolved	543.23(c)(6) All material exceptions identified by internal audit work are investigated and resolved		23.5
A a	All material exceptions resulting from internal	542.22(e) All material exceptions resulting from	542.32(e) All material exceptions resulting from	542.42(e) All material exceptions resulting from				23.5
e v	All material exceptions resulting from internal audit work shall be investigated and resolved	542.22(e) All material exceptions resulting from internal audit work shall be investigated and	542.32(e) All material exceptions resulting from internal audit work shall be investigated and	542.42(e) All material exceptions resulting from internal audit work shall be investigated and	internal audit work are investigated and resolved	internal audit work are investigated and resolved		23.5

R	EF CN TICS		542		NIGC Class III Guidance	543	Other Regs	REF	Recommended
	Section 23 - Internal Audit	542.22 (Tier A)	542.32 (Tier B)	542.42 (Tier C)	BULLETIN 2018-3 §14	543.23			Revisions
								А	Internal audit findings are reported to management.
	Internal audit findings are reported to management, responded to by management stating corrective measures to be taken to avoid recurrence of the audit exception, and included in the report delivered to management, the Cherokee Nation, CNGC, audit committee, or other entity designated by the Cherokee Nation for corrective action.	542.22(f)(2) Management shall be required to respond to internal audit findings stating corrective measures to be taken to avoid	reported to management.  542.32(f)(2) Management shall be required to respond to internal audit findings stating corrective measures to be taken to avoid	542.42(f)(1) Internal audit findings shall be reported to management.  542.42(f)(2) Management shall be required to respond to internal audit findings stating corrective measures to be taken to avoid recurrence of the audit exception.	,	543.23(c)(7) Internal audit findings are reported to management, responded to by management stating corrective measures to be taken, and included in the report delivered to management, the Tribe, TGRA, audit committee, or other entity designated by the Tribe for corrective action.		В	Management shall be required to responded to internal audit findings by management stating the corrective measures to be taken to avoid recurrence of the audit exception, within established deadlines. and included inthe report delivered to management, the Cherokee Nation, CNGC, audit committee, or other entity designated by the Cherokee Nation for corrective action.
	Such management responses shall be included in the internal audit report that will be delivered to management, the Nation, audit committee, the CNGC, or other entity designated by the Nation.	be included in the internal audit report that will be delivered to management, the Tribe, Tribal	be delivered to management, the Tribe, Tribal gaming regulatory authority, audit committee, or	542.42(f)(3) Such management responses shall be included in the internal audit report that will be delivered to management, the Tribe, Tribal gaming regulatory authority, audit committee, or other entity designated by the Tribe.				С	Such management responses shall be included in the internal audit report that will be delivered to management, the Nation, audit committee, the CNGC, Tribal Council, Tribal Administration, or other entity designated by the Nation. as would be privy to the report and designated on the report distribution list to be maintained.

542	NIGC Class III Guidance	543		Proposed Section X
542.15	BULLETIN 2018-3	543.15		Lines of Credit
	§9		X.1	Supervision
Computer applications. For any computer				
applications utilized, alternate documentation and/or				
procedures that provide at least the level of control				
described by the standards in this section, as				
approved by the Tribal gaming regulatory authority,				
will be acceptable. 542.15(a)				
	Supervision. Supervision must be provided as needed for the	543.15(a) Supervision. Supervision must be provided as		Supervision must be provided as needed for the
	authorization, extension, or modification of lines of credit by	needed for lines of credit by an agent(s) with authority equal		authorization, extension, or modification of lines of credit by
	an agent(s) with authority equal to or greater than those being			an agent(s) with authority equal to or greater than those
	supervised, 9(a)	to of greater than those being supervised.		being supervised. 9(a)
Credit Standards	Subervised. 9(a)		X.2	General Standards
542.15(b) The following standards shall apply if the	Establishment of lines of credit policy. 9(b)	(b) Establishment of lines of credit policy		The following standards shall apply if the gaming operation
gaming operation authorizes and extends credit to				authorizes and extends credit to patrons (excluding personal
customers:				checks, payroll checks, cashier's checks, and traveler's
customers.				checks)
	If a gaming operation extends lines of credit, controls must be	543.15(b)(1) If a gaming operation extends lines of credit,		If a gaming operation extends lines of credit, controls must
	established and procedures implemented to safeguard the	controls must be established and procedures implemented to		be established and procedures implemented to safeguard
	assets of the gaming operation. Such controls must include a	safeguard the assets of the gaming operation. Such controls	Α	the assets of the gaming operation. Such controls must
	lines of credit policy including the following: (9)(b)(1)	must include a lines of credit policy including the following:		include a lines of credit policy including the following:
	lines of create policy including the following. (5)(b)(1)	initiast include a lines of credit policy including the following.		include a lines of creat policy including the following.
	A process for the patron to apply for, modify, and/or re-	543.15(b)(1)(i) A process for the patron to apply for, modify,		A process for the patron to apply for, modify, and/or re-
	establish lines of credit, to include required documentation	and/or re-establish lines of credit, to include required	1	establish lines of credit, to include required documentation
	and credit line limit; 9(b)(1)(i)	documentation and credit line limit;		and credit line limit;
	Authorization levels of credit issuer(s); 9(b)(1)(ii)	543.15(b)(1)(ii) Authorization levels of credit issuer(s);	2	Authorization levels of credit issuer(s);
	Identification of agents authorized to issue lines of credit;	543.15(b)(1)(iii) Identification of agents authorized to issue	3	Identification of agents authorized to issue lines of credit;
	9(b)(1)(iii)	lines of credit;	3	
	A process for verifying an applicant's credit worthiness;	543.15(b)(1)(iv) A process for verifying an applicant's credit	1	A process for verifying an applicant's credit worthiness;
	9(b)(1)(iv)	worthiness;	4	
	A system for recording patron information, to include:	543.15(b)(1)(v) A system for recording patron information, to	5	A system for recording patron information, to include:
	9(b)(1)(v)	include:	J	
At least the following information shall be recorded				
for customers that have credit limits or are issued				
credit (excluding personal checks, payroll checks,				
cashier's checks, and traveler's checks): 542.15(b)(1)				
Customer's name, current address, and signature;	Name, current address, and signature; 9(b)(1)(v)(A)	543.15(b)(1)(v)(A) Name, current address, and signature;	a	Name, current address, and signature;
542.15(b)(1)(i)		542.45(1)(4)(1)(P) 11 (10 11 11 11 11 11 11 11 11 11 11 11 11 1	-	T
Identification verifications; 542.15(b)(1)(ii)	Identification credential; 9(b)(1)(v)(B)	543.15(b)(1)(v)(B) Identification credential;	D	Identification verifications;
Authorized credit limit; 542.15(b)(1)(iii)	Authorized credit line limit; 9(b)(1)(v)(C)	543.15(b)(1)(v)(C) Authorized credit line limit;	С	Authorized credit line limit;
Documentation of authorization by a person	Documented approval by an agent authorized to approve	543.15(b)(1)(v)(D) Documented approval by an agent	الد	Documentation of authorization by a person designated by
designated by management to approve credit limits;	credit line limits; 9(b)(1)(v)(D)	authorized to approve credit line limits;	d	management to approve credit limits;
and 542.15(b)(1)(iv)		F42.1E(1.)(1)(1)(1)(1)		
Credit issuances and payments. 542.15(b)(1)(v)		543.15(b)(1)(v)(E) Date, time and amount of credit issuances	е	Date, time and amount of credit issuances and payments;
	9(b)(1)(v)(E)	and payments; and		and

542	NIGC Class III Guidance	543		Proposed Section X
542.15	BULLETIN 2018-3	543.15		Lines of Credit
	Amount of available credit. 9(b)(1)(v)(F)	543.15(b)(1)(v)(F) Amount of available credit.	f	Amount of available credit.
	9(b)(1)(vi) A process for issuing lines of credit to:	543.15(b)(1)(vi) A process for issuing lines of credit to:	6	A process for issuing lines of credit to:
	9(b)(1)(vi)(A) Verify the patron's identity;	543.15(b)(1)(vi)(A) Verify the patron's identity;	a	Verify the patron's identity;
	9(b)(1)(vi)(B) Notify the patron of the lines of credit terms,	543.15(b)(1)(vi)(B) Notify the patron of the lines of credit		Notify the patron of the lines of credit terms, including
	including obtaining patron's written acknowledgment of the	terms, including obtaining patron's written acknowledgment	b	obtaining patron's written acknowledgment of the terms by
	terms by signature;	of the terms by signature;		signature;
	9(b)(1)(vi)(C) Complete a uniquely identified, multi-part, lines	543.15(b)(1)(vi)(C) Complete a uniquely identified, multi-part,		Complete a uniquely identified, multi-part, lines of credit
	of credit issuance form, such as a marker or counter check,	lines of credit issuance form, such as a marker or counter	C	issuance form, such as a marker or counter check, which
	which includes the terms of the lines of credit transaction;	check, which includes the terms of the lines of credit		includes the terms of the lines of credit transaction;
		transaction:		
	9(b)(1)(vi)(D) Obtain required signatures;	543.15(b)(1)(vi)(D) Obtain required signatures;	d	Obtain required signatures;
	9(b)(1)(vi)(E) Determine the amount of the patron's available	543.15(b)(1)(vi)(E) Determine the amount of the patron's	e	Determine the amount of the patron's available lines of
	lines of credit;	available lines of credit;		credit;
	•	543.15(b)(1)(vi)(F) Update the credit balance record at the		Update the credit balance record at the time of each
	each transaction to ensure that lines of credit issued are within	time of each transaction to ensure that lines of credit issued	f	transaction to ensure that lines of credit issued are within
	the established limit and balance for that patron; and	are within the established limit and balance for that patron;		the established limit and balance for that patron; and
		and		
	9(b)(1)(vi)(G) Require the agent issuing the lines of credit to	543.15(b)(1)(vi)(G) Require the agent issuing the lines of credit		Require the agent issuing the lines of credit to be
	be independent of the agent who authorized the lines of	to be independent of the agent who authorized the lines of	g	independent of the agent who authorized the lines of credit.
	credit.	credit.		
	9(b)(1)(vii) A policy establishing credit line limit exceptions to	543.15(b)(1)(vii) A policy establishing credit line limit	7	A policy establishing credit line limit exceptions to include
	include the following:	exceptions to include the following:		the following:
	9(b)(1)(vii)(A) Identification of the agent(s) authorized to	543.15(b)(1)(vii)(A) Identification of the agent(s) authorized to	a	Identification of the agent(s) authorized to permit a credit
	permit a credit line limit to be exceeded;	permit a credit line limit to be exceeded;		line limit to be exceeded;
	9(b)(1)(vii)(B) Authorization thresholds; and	543.15(b)(1)(vii)(B) Authorization thresholds; and	b	Authorization thresholds; and
	9(b)(1)(vii)(C) Required documentation.	543.15(b)(1)(vii)(C) Required documentation.	С	Required documentation.
	9(b)(1)(viii) A policy governing increases and decreases to a	543.15(b)(1)(viii) A policy governing increases and decreases		A policy governing increases and decreases to a patron's
	patron's lines of credit account balances to include the	to a patron's lines of credit account balances to include the	8	lines of credit account balances to include the following:
	following:	following:		
	9(b)(1)(A) Documentation and record keeping requirements;	543.15(b)(1)(A) Documentation and record keeping	а	Documentation and record keeping requirements;
	5424501	requirements;		
	543.159department that receives the payment and the	543.15(b)(1)(viii)(B) Independence between the department		Independence between the department that receives the
	department that maintains custody of the credit balance for	that receives the payment and the department that maintains	b	payment and the department that maintains custody of the
	payments made by mail;	custody of the credit balance for payments made by mail;		credit balance for payments made by mail;
	Q(b)(1)(viii)(C) Collections:	542.15(b)(1)(viii)(C) Collections:		Collections
	9(b)(1)(viii)(C) Collections;	543.15(b)(1)(viii)(C) Collections; 543.15(b)(1)(viii)(D) Periodic audits and confirmation of	C	Collections; Periodic audits and confirmation of balances; and
	9(b)(1)(viii)(D) Periodic audits and confirmation of balances;	'''''	d	remodic addits and confirmation of balances; and
	9(b)(1)(viii)(E) If a collection agency is used, a process to	balances; and 543.15(b)(1)(viii)(E) If a collection agency is used, a process to		
	ensure documentation of increases and decreases to the lines	ensure documentation of increases and decreases to the lines		
Prior to extending credit, the customer's gaming	of credit account balances.	of credit account balances.		Prior to extending credit, the patron's gaming operation
operation credit record and/or other documentation				credit record and/or other documentation shall be examined
shall be examined to determine the following:			В	
542.15(b)(2)				to determine the following:
Properly authorized credit limit; 542.15(b)(2)(i)			1	Properly authorized credit limit;
- openy damoneca create mine, steres(b)(2)(1)	1	1	_	1. Topony damonized credit ining

542	NIGC Class III Guidance	543	Proposed Section X
542.15	BULLETIN 2018-3	543.15	Lines of Credit
Whether remaining credit is sufficient to cover the			Whether remaining credit is sufficient to cover the cred
credit issuance; and 542.15(b)(2)(ii)			issuance; and
Identity of the customer (except for known			Identity of the patron (except for known customers).
customers). 542.15(b)(2)(iii)			
Credit extensions over a specified dollar amount shall			Credit extensions over a specified dollar amount shall be
be approved by personnel designated by			C approved by personnel designated by management.
management. 542.15(b)(3)			approved by personner designated by management.
Proper approval of credit extensions over ten percent			Proper approval of credit extensions over ten percent (
(10%) of the previously established limit shall be			of the previously established limit shall be documented
documented. 542.15(b)(4)			or the previously established little shall be documented
The job functions of credit approval (i.e., establishing			The job functions of credit approval (i.e., establishing the
the customer's credit worthiness) and credit			patron's credit worthiness) and credit extension (i.e.,
extension (i.e.,advancing customer's credit) shall be			advancing patron's credit) shall be segregated for credi
segregated for credit extensions to a single customer			extensions to a single patron of \$10,000 or more per da
of \$10,000 or more per day (applies whether the			(applies whether the credit is extended in the pit or the
credit is extended in the pit or the cage). 542.15(b)(5)			cage).
If cage credit is extended to a single customer in an			If cage credit is extended to a single customer in an am
amount exceeding \$2,500, appropriate gaming			exceeding \$2,500, appropriate gaming personnel shall
personnel shall be notified on a timely basis of the			notified on a timely basis of the customers playing on o
customers playing on cage credit, the applicable			credit, the applicable amount of credit issued, and the
amount of credit issued, and the available balance.			available balance.
542 15(b)(6)			available balance.
Cage marker forms shall be at least two parts (the			Cage marker forms shall be at least two parts (the origi
original marker and a payment slip), prenumbered by			marker and a payment slip), pre-numbered by the print
the printer or concurrently numbered by the			G concurrently numbered by the computerized system, as
			concurrently numbered by the computerized system, an
computerized system, and utilized in numerical			utilized in numerical sequence.
Sequence 542 15(h)(7) The completed original cage marker shall contain at			The completed original cage marker shall contain at lea
least the following information: 542.15(b)(8)			H following information:
least the following information: 542.15(b)(8)			Tollowing information.
Marker number; 542.15(b)(8)(i)			1 Marker number;
Player's name and signature; and 542.15(b)(8)(ii)			2 Player's name and signature; and
Amount of credit issued (both alpha and numeric).			Amount of credit issued (both alpha and numeric).
542.15(b)(8)(iii)			
The completed payment slip shall include the same			The completed payment slip shall include the same ma
marker number as the original, date and time of			number as the original, date and time of payment, amo
payment, amount of payment, nature of settlement			of payment, nature of settlement (cash, chips, etc.), and
(cash, chips, etc.), and signature of cashier receiving			signature of cashier receiving the payment.
the payment 542 15(b)(9)			Signature of custiler receiving the payment.
			X.3 Payment Standards
Payment standards. All payments received on			All payments received on outstanding credit instrument
outstanding credit instruments shall be recorded in			shall be recorded in ink or other permanent form of
ink or other permanent form of recordation in the			recordation in the gaming operation's records.
gaming operation's records, 542.15(c)(1)			ς της συναμένης συναμένης του του του του του του του του του του

542	NIGC Class III Guidance	543	Proposed Section X
542.15	BULLETIN 2018-3	543.15	Lines of Credit
When partial payments are made on credit			When partial payments are made on credit instruments, they
instruments, they shall be evidenced by a multi-part			shall be evidenced by a multi-part receipt (or another
receipt (or another equivalent document) that			equivalent document) that contains:
contains: 542.15(c)(2)			equivalent decamenty that contains.
The same preprinted number on all copies;			The same preprinted number on all copies;
542.15(c)(2)(i)			
Customer's name; 542.15(c)(2)(ii)			2 Patron's name;
Date of payment; 542.15(c)(2)(iii)			3 Date of payment;
Dollar amount of payment (or remaining balance if a			Dollar amount of payment (or remaining balance if a new
new marker is issued), and nature of settlement (cash,			4 marker is issued), and nature of settlement (cash, chips, etc.);
chips, etc.); 542.15(c)(2)(iv)			marker is issued), and natare or settlement (easily emps) etc.))
Signature of employee receiving payment; and			Signature of employee receiving payment; and
542.15(c)(2)(v)			5   5   5   5   5   5   5   5   5   5
Number of credit instrument on which partial			Number of credit instrument on which partial payment is
payment is being made. 542.15(c)(2)(vi)			being made.
Unless account balances are routinely confirmed on a			Unless account balances are routinely confirmed on a
random basis by the accounting or internal audit			random basis by the accounting or internal audit
departments, or statements are mailed by a person			departments, or statements are mailed by a person
independent of the credit transactions and			independent of the credit transactions and collections
·			· ·
collections thereon, and the department receiving			thereon, and the department receiving payments cannot
payments cannot access cash, then the following			access cash, then the following standards shall apply:
Ctandards chall apply: 542.15(c)(2) The routing procedures for payments by mail require			The routing procedures for payments by mail require that
that they be received by a department independent			they be received by a department independent of credit
of credit instrument custody and collection;			instrument custody and collection;
542.15(c)(3)(i)			instrument custody and collection,
Such receipts by mail shall be documented on a			Such receipts by mail shall be documented on a listing
listing indicating the customer's name, amount of			indicating the patron's name, amount of payment, nature of
payment, nature of payment (if other than a check),			payment (if other than a check), and date payment received;
and date payment received; and 542.15(c)(3)(ii)			and
The total amount of the listing of mail receipts shall			The total amount of the listing of mail receipts shall be
be reconciled with the total mail receipts recorded on			reconciled with the total mail receipts recorded on the
· ·			appropriate accountability form by the accounting
the appropriate accountability form by the			J
accounting department on a random basis (for at			department on a random basis (for at least three (3) days per
least three (3) days per month). 542.15(c)(3)(iii)			month).
			X.4 Access to Credit Documentation
Access to credit documentation. Access to credit			Access to credit documentation shall be restricted as follows:
documentation shall be restricted as follows:			A
542.15(d)(1)			
The credit information shall be restricted to those			The credit information shall be restricted to those positions
positions that require access and are so authorized			that require access and are so authorized by management;
by management; 542.15(d)(1)(i)			that regains access and are so duthorized by management,
DY HIGHAUCHICH, 342.13(U)(1)(I)			

542	NIGC Class III Guidance	543		Proposed Section X
542.15	BULLETIN 2018-3	543.15		Lines of Credit
Outstanding credit instruments shall be restricted to				Outstanding credit instruments shall be restricted to persons
persons authorized by management; and			2	authorized by management; and
542.15(d)(1)(ii)				
Written-off credit instruments shall be further				Written-off credit instruments shall be further restricted to
restricted to persons specified by management.			3	persons specified by management.
542.15(d)(1)(iii)				
Reserved] 542.15(d)(2)				
			X.5	Maintenance of Credit Documentation
Maintenance of credit documentation. (1) All				All extensions of cage credit, pit credit transferred to the
extensions of cage credit, pit credit transferred to the				cage, and subsequent payments shall be documented on a
cage, and subsequent payments shall be			Α	credit instrument control form.
documented on a credit instrument control form.				creat instrument control form.
542 15(e)(1)				
Records of all correspondence, transfers to and from				Records of all correspondence, transfers to and from outside
outside agencies, and other documents related to				agencies, and other documents related to issued credit
issued credit instruments shall be maintained.			В	instruments shall be maintained.
				instruments shall be maintained.
542.15(e)(2)			X.6	Write-off and Settlement Standards
	A policy governing write-offs and settlements to include:	543.15(b)(1)(ix) A policy governing write-offs and settlements	Λ.0	Write-ori and Settlement Standards
		, , , ,		
Written-off or settled credit instruments shall be	9(b)(1)(ix)	to include:		Written-off or settled credit instruments shall be authorized
			Α	
authorized in writing.				in writing.
			Б	Such authorizations shall be made by at least two
			В	management officials who are from departments
				independent of the credit transaction.
			C	Controls must be established and procedures inplemented
				that include a policy governing write-offs and settlements
				and must <b>contain</b> the following:
	Identification of agent(s) authorized to approve write-offs and	_	1	Identification of agent(s) authorized to approve write-offs
	settlements; 9(b)(1)(ix)(A)	approve write-offs and settlements;		and settlements;
Such authorizations shall be made by at least two	Authorization levels for write-offs and settlements of lines of	543.15(b)(1)(ix)(B) Authorization levels for write-offs and		Authorization levels for write-offs and settlements of lines of
management officials who are from departments	credit instruments; 9(b)(1)(ix)(B)	settlements of lines of credit instruments;	2	credit instruments;
independent of the credit transaction. 542.15(f)(2)			_	
	Required documentation for write-offs and settlements;	543.15(b)(1)(ix)(C) Required documentation for write-offs and	3	Required documentation for write-offs and settlements;
	9(b)(1)(ix)(C)	settlements;		
	Independence between the agent who established the lines of	543.15(b)(1)(ix)(D) Independence between the agent who		Independence between the agent who established the lines
	credit and the agent writing off or settling the lines of credit	established the lines of credit and the agent writing off or	4	of credit and the agent writing off or settling the lines of
	instrument; and 9(b)(1)(ix)(D)	settling the lines of credit instrument; and		credit instrument; and
	Necessary documentation for the approval of write-offs and	543.15(b)(1)(ix)(E) Necessary documentation for the approval		Necessary documentation for the approval of write-offs and
	settlements and transmittal to the appropriate department for	of write-offs and settlements and transmittal to the	5	settlements and transmittal to the appropriate department
	recording and deductibility. 9(b)(1)(ix)(E)	appropriate department for recording and deductibility.	Э	for recording and deductibility.
				3
			X.7	Collection Agency Standards

542	NIGC Class III Guidance	543	Proposed Section X
542.15	BULLETIN 2018-3	543.15	Lines of Credit
Collection agency standards. (1) If credit instruments are transferred to collection agencies or other collection representatives, a copy of the credit instrument and a receipt from the collection representative shall be obtained and maintained until the original credit instrument is returned or payment is received. 542.15(g)(1)			If credit instruments are transferred to collection agencies or other collection representatives, a copy of the credit instrument and a receipt from the collection representative shall be obtained and maintained until the original credit instrument is returned or payment is received.
A person independent of credit transactions and collections shall periodically review the documents in paragraph (g)(1) of this section. 542.15(g)(2)			A person independent of credit transactions and collections shall periodically review such documents.
Accounting/auditing standards. (1) A person independent of the cage, credit, and collection functions shall perform all of the following at least three (3) times per year: 542.15(h)(1)	§13(d)(9)(i) At least three (3) times per year, an agent independent of the cage, credit, and collection functions must perform the following review:  §13(d)(9)(i)(A) Select a sample of line of credit accounts;	543.24	
Ascertain compliance with credit limits and other established credit issuance procedures; 542.15(h)(1)(i)	·	543.24(d)(7)(i)(B)	
	§13(d)(9)(i)(C) Reconcile outstanding balances of both active and inactive (includes write- offs and settlements) accounts on the accounts receivable listing to individual credit records and physical instruments. This procedure need only be performed once per year for inactive accounts;	543.24(d)(7)(i)(C)	
• • • • • • • • • • • • • • • • • • • •	§13(d)(9)(i)(D) Examine line of credit records to determine that appropriate collection efforts are being made and payments are being properly recorded; and	543.24(d)(7)(i)(D)	
	§13(d)(9)(i)(E) For at least five (5) days during the review period, subsequently reconcile partial payment receipts to the total payments recorded by the cage for the day and account for the receipts numerically.	543.24(d)(7)(i)(E)	
	§13(d)(9)(i)(ii) At least monthly, perform an evaluation of the collection percentage of credit issued to identify unusual trends.	543.24(d)(7)(ii)	
[Reserved] 542.15(h)(2)			V 0 V 1
			X.8 Variances

542	NIGC Class III Guidance	543	Proposed Section X
542.15	BULLETIN 2018-3	543.15	Lines of Credit
	(c) Variances. The operation must establish, as approved by	(c) Variances. The operation must establish, as approved by	The operation must establish, as approved by the CNGC, the
	the TGRA, the threshold level at which a variance must be	the TGRA, the threshold level at which a variance must be	threshold level at which a variance must be reviewed to
	reviewed to determine the cause. Any such review must be	reviewed to determine the cause. Any such review must be	determine the cause. Any such review must be documented.
	documented.	documented.	

542	NIGC Class III Guidance	543	Proposed Section X
542.15	BULLETIN 2018-3	543.15	Lines of Credit

542	NIGC Class III Guidance	REF	Recommended Language
Commuter Applications F42 10(a)		WW 1	
Computer Applications. 542.10(a)		XX.1	
Computer applications. For any computer			
applications utilized, alternate documentation and/or			
procedures that provide at least the level of control			
described by the standards in this section, as			
approved by the Tribal gaming regulatory authority,			
will be acceptable. 542.10(a)			
	2(a) Supervision. Supervision must be provided as		
	needed for keno operations by an agent(s) with		
	authority equal to or greater than those being		
	supervised.		
<u>Deskman</u> means a person who authorizes payment of	(1) Deskman. A person who authorizes payment of		<b>Deskman</b> - A person who authorizes payment of winning
winning tickets and verifies payouts for keno games.	winning tickets and verifies payouts for keno games.		tickets and verifies payouts for keno games.
<u>Draw ticket</u> means a blank keno ticket whose numbers	(1) Draw ticket. A blank keno ticket whose numbers		<b>Draw ticket</b> - A blank keno ticket whose numbers are
are punched out when balls are drawn for the game. Used	are punched out when balls are drawn for the game		punched out when balls are drawn for the game that is
to verify winning tickets.	that is used to verify winning tickets.		used to verify winning tickets.
<u>Multi-race ticket</u> means a keno ticket that is played in	(1) Multi-race ticket. A keno ticket that is played in		Multi-race ticket - A keno ticket that is played in multiple
multiple games.	multiple games.		games.
<u>Outstation</u> means areas other than the main keno area			Outstation - areas other than the main keno area where
where bets may be placed and tickets paid.			bets may be placed and tickets paid.
<b>Rabbit ears</b> means a device, generally V - shaped, that	(1) Rabbit ears. A device, generally V-shaped, that holds		<b>Rabbit ears</b> - A device, generally V-shaped, that holds the
holds the numbered balls selected during a keno or bingo	the numbered balls selected during a keno or bingo game		numbered balls selected during a keno or bingo game so
game so that the numbers are visible to players and	so that the numbers are visible to players and employees.		that the numbers are visible to players and employees
employees.			agents.
Game Play Standards 542.10(b)	Game Play Standards §2(b)	XX.2	Game Play Standards
	2(b)(1) The computerized customer ticket must		
The computerized customer ticket shall include the	include the date, game number, ticket sequence		The computerized patron ticket must include the date,
date, game number, ticket sequence number, station	number, station number or writer identification	Α	game number, ticket sequence number, station number or
number, and conditioning (including multi-race if	number, and conditioning (including multi-race if		writer identification number, and conditioning (including
applicable). 542.10(b)(1)	applicable).		multi-race if applicable).
The information on the ticket shall be recorded on a			
restricted transaction log or computer storage media	2(b)(2) Concurrently with the generation of the	D	The information on the ticket shall be recorded on a
concurrently with the generation of the ticket.	ticket the information on the ticket must be recorded	В	restricted transaction log or computer storage media
542.10(b)(2)	in a manner that restricts access.		concurrently with the generation of the ticket.

542	NIGC Class III Guidance	REF	Recommended Language
Keno personnel shall be precluded from having			
access to the restricted transaction log or computer	2(b)(3) Keno personnel must be precluded from	C	Keno personnel shall be precluded from having access to
storage media. 542.10(b)(3)	having access to the restricted ticket information.		the restricted transaction log or computer storage media.
when it is necessary to void a ticket, the void	2(b)(4) When it is necessary to void a ticket, the void		
information shall be inputted in the computer and	information must be entered into the computer and		When it is necessary to void a ticket, the void information
the computer shall document the appropriate	the computer must document the appropriate	D	must be entered into the computer and the computer must
	information pertaining to the voided wager (e.g., void		document the appropriate information pertaining to the
slip is issued or equivalent documentation is	slip is issued or equivalent documentation is		voided wager (e.g., void slip is issued or equivalent
generated). 542.10(b)(4)	generated).		documentation is generated).
Controls shall exist to prevent the writing and voiding	·		
of tickets after a game has been closed and after the	and voiding of tickets after a game has been closed	Е	Controls must exist to prevent the writing and voiding of
number selection process for that game has begun.	and after the number selection process for that game	_	tickets after a game has been closed and after the number
542.10(b)(5)	has begun.		selection process for that game has begun.
	2(b)(6) The controls in effect for tickets prepared in		The controls in effect for tickets prepared in areas other
The controls in effect for tickets prepared in	·	_	
The controls in effect for tickets prepared in	areas other than the main keno area where bets may	F	than the main keno area where bets may be placed and
outstations (if applicable) shall be identical to those	be placed and tickets paid must be identical to those		tickets paid must be identical to those in effect for the
in effect for the primary keno game. 542.10(b)(6)	in effect for the primary keno game.	3	primary keno game.
Rabbit Ear or Wheel System 542.10(c) The following standards shall apply if a rabbit ear or	Rabbit Ear or Wheel System §2(c)  2(c) The following standards must apply if a rabbit	хх.3	Rabbit Ear or Wheel System  The following standards must apply if a rabbit ear or wheel
			system is utilized:
wheel system is utilized: 542.10(c)(1)  A dedicated camera shall be utilized to monitor the	ear or wheel system is utilized:		A dedicated camera shall be utilized to monitor the
following both prior to, and subsequent to, the	2(c)(1) Before and after the game, the following must	Α	following both prior to, and subsequent to, the calling of a
calling of a game: 542.10(c)(1)(i)	be monitored by a dedicated camera:	A	game:
Empty rabbit ears or wheel; 542.10(c)(1)(i)(A)	2(c)(1)(i) Empty rabbit ears or wheel;	1	Empty rabbit ears or wheel;
Date and time; 542.10(c)(1)(i)(B)	2(c)(1)(ii) Date and time;	2	Date and time;
Game number; and 542.10(c)(1)(i)(C)	2(c)(1)(iii) Game number; and	3	Game number; and
Full rabbit ears or wheel. 542.10(c)(1)(i)(D)	2(c)(1)(iv) Full rabbit ears or wheel.	4	Full rabbit ears or wheel.
The film of the rabbit ears or wheel shall provide a	2(c)(2) The recording of the rabbit ears or wheel	<u> </u>	
legible identification of the numbers on the balls	must provide a legible identification of the numbers	В	The recording of the rabbit ears or wheel must provide a
drawn. 542.10(c)(1)(ii)	on the balls drawn.		legible identification of the numbers on the balls drawn.
Keno personnel shall immediately input the selected	2(c)(3) Keno agents must immediately input the		
numbers in the computer and the computer shall	numbers on the balls drawn in the computer and the		Keno agents must immediately input the numbers on the
document the date, the game number, the time the	computer must document the date, the game	С	balls drawn in the computer and the computer must
game was closed, and the numbers drawn.	number, the time the game was closed, and the		document the date, the game number, the time the game
542.10(c)(1)(iii)	numbers drawn.		was closed, and the numbers drawn.

542	NIGC Class III Guidance	REF	Recommended Language
The Tribal gaming regulatory authority, or the			
gaming operation as approved by the Tribal gaming			
regulatory authority, shall establish and the gaming			The CNGC, or the gaming operation as approved by the
operation shall comply with procedures that prevent	2(c)(4) Controls must be established and procedures	D	CNGC, shall establish and the gaming operation shall
unauthorized access to keno balls in play.	•		comply with procedures that prevent unauthorized access
. ,	implemented that prevent unauthorized access to		
542.10(c)(1)(iv) Back-up keno ball inventories shall be secured in a	keno balls in play.		to keno balls in play.
manner to prevent unauthorized access.	2(c)(5) Back-up keno ball inventories must be	Е	Back-up keno ball inventories must be secured in a manner
542.10(c)(1)(v)	secured in a manner to prevent unauthorized access.	L	to prevent unauthorized access.
312.10(c)(1)(v)	·		to prevent undutnonzed decess.
	2(c)(6) Controls must be established and procedures		
	implemented to ensure that all eligible objects used		Controls must be established and procedures implemented
	in the conduct of the keno game are available to be		to ensure that all eligible objects used in the conduct of the
The Tribal gaming regulatory authority, or the	drawn and have not been damaged or altered.		keno game are available to be drawn and have not been
gaming operation as approved by the Tribal gaming	Verification of physical objects must be performed by	F	damaged or altered. Verification of physical objects must
regulatory authority, shall establish and the gaming	two agents before the start of the first keno		be performed by two agents before the start of the first
operation shall comply with procedures for	game/session. At least one of the verifying agents		keno game/session. At least one of the verifying agents
inspecting new keno balls put into play as well as for	must be a supervisory agent or independent of the		must be a supervisory agent or independent of the keno
those in use. 542.10(c)(1)(vi)	keno games department.		games department.
[Reserved] 542.10(c)(2)			
Random Number Generator 541.10(d)	Random Number Generator §2(d)	XX.4	Random Number Generator
	2(d) If a random number generator is utilized,		If a random number generator is utilized, controls must be
The following standards shall apply if a random	controls must be established and procedures	Α	established and procedures implemented that require the
number generator is utilized: 542.10(d)(1)	implemented that require the following:		following:
_	2(d)(1) The numbers selected by the random number		The control of the state of the
computer system and shall directly relay the numbers	1 -	1	The numbers selected by the random number generator
selected into the computer without manual input.	automatically recorded in, the keno computer		must be directly relayed to, and automatically recorded in,
542.10(d)(1)(i)	system.		the keno computer system.
Keno personnel shall be precluded from access to the	2(d)(2) Keno agents must be precluded from access	2	Keno agents must be precluded from access to the random
random number generator. 542.10(d)(1)(ii)	to the random number generator.	2	number generator.
[Reserved] 542.10(d)(2)	to the fandom number generator.		number generator.
Winning Tickets 542.10(e)	Prize Payout §2(e)	XX.5	Prize Payout/Winning Tickets
12.20(0)		AA.3	The Tayout, Thining Helico
	2(e)(1) Controls must be established and procedures	Α	Controls must be established and procedures implemented
	implemented that address the following:		that address the following:
	implemented that address the following.		
	2(e)(1)(i) Identification of the agent authorized (by		Identification of the agent authorized (by position) to make

542	NIGC Class III Guidance	REF	Recommended Language
	2(e)(1)(ii) Predetermined payout authorization levels	2	
	(by position);		Predetermined payout authorization levels (by position);
	2(e)(1)(iii) Documentation procedures ensuring	3	Documentation procedures ensuring separate control of
	separate control of the cash accountability functions;	3	the cash accountability functions;
Winning tickets shall be verified and paid as follows: 542.10(e)			
The sequence number of tickets presented for	2(e)(1)(iv) The sequence number of tickets		The sequence number of tickets presented for payment
payment shall be inputted into the computer, and	presented for payment must be entered into the	4	must be entered into the computer, and the payment
the payment amount generated by the computer	computer, and the payment amount generated by	•	amount generated by the computer must be given to the
shall be given to the customer. 542.10(e)(1)	the computer must be given to the customer.		patron;
The Tribal gaming regulatory authority, or the			
gaming operation as approved by the Tribal gaming			
regulatory authority, shall establish and the gaming			
operation shall comply with procedures that preclude		5	
payment on tickets previously presented for			
payment, unclaimed winning tickets (sleepers) after a			
specified period of time, voided tickets, and tickets	2(e)(1)(v) Preclusion of payment of tickets previously		Preclusion of payment of tickets previously presented for
that have not been issued yet. 542.10(e)(2)	presented for payment;		payment;
	2(e)(1)(vi) Unclaimed winning tickets (sleepers) after	6	Unclaimed winning tickets (sleepers) after a specified
	a specified period of time;	0	period of time;
	2(e)(1)(vii) Voided tickets; and	7	Voided tickets; and
	2(e)(1)(viii) Tickets that have not been issued yet.	8	Tickets that have not been issued yet.
All payouts shall be supported by the customer	2(e)(1)(ix) All payouts must be supported by the		
(computer-generated) copy of the winning ticket	customer (computer-generated) copy of the winning	9	All payouts must be supported by the patron (computer-
(payout amount is indicated on the customer ticket	ticket (payout amount is indicated on the customer	9	generated) copy of the winning ticket (payout amount is
or a payment slip is issued). 542.10(e)(3)	ticket or a payment slip is issued).		indicated on the patron ticket or a payment slip is issued).
A manual report or other documentation shall be	2(e)(1)(x) A manual report or other documentation		
produced and maintained documenting any	must be produced and maintained documenting any	10	A manual report or other documentation must be
	payments made on tickets that are not authorized by	10	produced and maintained documenting any payments
the computer. 542.10(e)(4)	1		made on tickets that are not authorized by the computer.
the computer. 342.10(e)(4)	the computer.		made on tickets that are not authorized by the computer.

542	NIGC Class III Guidance	REF	Recommended Language
Winning tickets over a specified dollar amount (not to exceed \$10,000 for locations with more than \$5 million annual keno write and \$3,000 for all other locations) shall also require the following: 542.10(e)(5)	2(e)(2) Prize payouts over a specified dollar amount, not to exceed \$10,000 or a lower threshold as authorized by management and approved by the TGRA, must also require the following:	В	Prize payouts/winning tickets over a specified dollar amount, (not to exceed \$10,000 for locations with more than \$5 million annual keno write and \$3,000 for all other locations) or a lower threshold as authorized by management and approved by the CNGC, must also require the following:
Approval of management personnel independent of the keno department, evidenced by their signature; 542.10(e)(5)(i)	2(e)(2)(i) Approval of management personnel independent of the keno department, evidenced by their signature;	1	Approval of management personnel independent of the keno department, evidenced by their signature;
Review of the video recording and/or digital record of the rabbit ears or wheel to verify the legitimacy of the draw and the accuracy of the draw ticket (for rabbit ear or wheel systems only); 542.10(e)(5)(ii)	2(e)(2)(ii) Review of the video recording and/or digital record of the rabbit ears or wheel to verify the legitimacy of the draw and the accuracy of the draw ticket (for rabbit ear or wheel systems only);	2	Review of the video recording and/or digital record of the rabbit ears or wheel to verify the legitimacy of the draw and the accuracy of the draw ticket (for rabbit ear or wheel systems only);
Comparison of the winning customer copy to the computer reports; 542.10(e)(5)(iii)	2(e)(2)(iii) Comparison of the winning customer copy to the computer reports;	3	Comparison of the winning patron copy to the computer reports;
Regrading of the customer copy using the payout schedule and draw information; and 542.10(e)(5)(iv)	2(e)(2)(iv) Regrading of the customer copy using the payout schedule and draw information; and	4	Regrading of the patron copy using the payout schedule and draw information; and
Documentation and maintenance of the procedures in this paragraph. 542.10(e)(5)(v)	2(e)(2)(v) Documentation and maintenance of the performance of the procedures in this paragraph.	5	Documentation and maintenance of the performance of the procedures.
542.10(e)(6) When the keno game is operated by one person, all winning tickets in excess of an amount to be determined by management (not to exceed \$1,500) shall be reviewed and authorized by a person independent of the keno department.		D	When the keno game is operated by one person, all winning tickets in excess of an amount to be determined by management (not to exceed \$1,500) shall be reviewed and authorized by a person independent of the keno department.
	2(e)(3) Authorization and Signatures 2(e)(3)(i) At least two agents must authorize, sign, and witness prize payouts above \$1,500 or a lower threshold as authorized by management and approved by the TGRA.	E	Authorization and Signatures. At least two agents must authorize, sign, and witness prize payouts above \$1,500 or a lower threshold as authorized by management and approved by the CNGC.

542	NIGC Class III Guidance	REF	Recommended Language
	2(e)(3)(ii) Prize payouts above the following		
	threshold, or a lower threshold, as authorized by		Prize payouts above the following threshold, or a lower
	management and approved by TGRA, must require	F	threshold, as authorized by management and approved by
	one of the two signatures and verifications to be a	1	CNGC, must require one of the two signatures and
	supervisory or management employee independent		verifications to be a supervisory or management agent
	of the keno operation:		independent of the keno operation:
(	2(e)(3)(A) \$5,000 for a Tier A facility;	1	\$5,000 for a Tier A facility;
	2(e)(3)(B) \$10,000 at a Tier B facility;	2	\$10,000 at a Tier B facility;
	2(e)(3)(C) \$20,000 for a Tier C facility; or	3	\$20,000 for a Tier C facility; or
	2(e)(3)(D) \$50,000 for a Tier C facility with over	4	\$50,000 for a Tier C facility with over \$100,000,000 in gross
	\$100,000,000 in gross gaming revenues.	4	gaming revenues.
	2(e)(3)(iii) The predetermined thresholds, whether set		
	at the MICS level or lower, must be authorized by	C	The predetermined thresholds, whether set at the MICS
	management, approved by the CNGC, documented,	G	level or lower, must be authorized by management,
	and maintained.		approved by the CNGC, documented, and maintained.
	2(f) For each agent station, a cash summary report		For each agent station, a cash summary report (count
	(count sheet) at the end of each keno shift must be	Н	sheet) at the end of each keno shift must be prepared and
	prepared that includes:		shall include:
	2(f)(1) Computation of net cash proceeds for the shift		
	and the cash turned in, and any variances between		Computation of net cash proceeds for the shift and the
	the cash turn-in and the amount of net cash that the	1	cash turned in, and any variances between the cash turn-in
	computer system indicates should be in each agent		and the amount of net cash that the computer system
	station; and		indicates should be in each agent station; and
	2(f)(2) Signatures of two agents who have verified the		_
	net cash proceeds for the shift and the cash turned	2	Signatures of two agents who have verified the net cash
	in.		proceeds for the shift and the cash turned in.
Check Out Standards at the end of each Keno		VV C	
Shift 542.10(f)	Cash and Cash Equivalent Controls §2(g)	XX.6	Cash and Cash Equivalent Controls
For each writer station, a cash summary report (count		Α	For each writer station, a cash summary report (count
sheet) shall be prepared that includes: 542.10(f)(1)			sheet) shall be prepared that includes:
Computation of net cash proceeds for the shift and		1	Computation of net cash proceeds for the shift and the
the cash turned in; and 542.10(f)(1)(i)		т	cash turned in; and

542	NIGC Class III Guidance	REF	Recommended Language
	2(g)(1) Cash or cash equivalents exchanged between		
	two persons must be counted independently by at		Cash or cash equivalents exchanged between two persons
	least two agents and reconciled to the recorded	2	must be counted independently by at least two agents and
Signatures of two employees who have verified the	amounts at the end of each shift or session.	2	reconciled to the recorded amounts at the end of each shift
net cash proceeds for the shift and the cash turned	Unexplained variances must be documented and		or session. Unexplained variances must be documented
in. Unverified transfers of cash and/or cash	maintained. Unverified transfers of cash or cash		and maintained. Unverified transfers of cash or cash
equivalents are prohibited. 542.10(f)(1)(ii)	equivalents are prohibited.		equivalents are prohibited.
	2(g)(2) Procedures must be implemented to control		
	cash or cash equivalents based on the amount of the		Procedures must be implemented to control cash or cash
	transaction. These procedures must include	В	equivalents based on the amount of the transaction. These
	documentation by shift, session, or other relevant		procedures must include documentation by shift, session,
[Reserved] 542.10(f)(2)	time period of the following:		or other relevant time period of the following:
	2(g)(2)(i) Inventory, including any increases or	4	·
	decreases;	1	Inventory, including any increases or decreases;
	2(g)(2)(ii) Transfers;	2	Transfers;
	2(g)(2)(iii) Exchanges, including acknowledging	2	Exchanges, including acknowledging signatures or initials;
	signatures or initials; and	3	and
	2(g)(2)(iv) Resulting variances.	4	Resulting variances.
	2(g)(3) Any change to control of accountability,		
	exchange, or transfer requires that the cash or cash		Any change to control of accountability, exchange, or
	equivalents be counted and recorded independently	C	transfer requires that the cash or cash equivalents be
	by at least two agents and reconciled to the recorded		counted and recorded independently by at least two
	amount.		agents and reconciled to the recorded amount.
Promotional Payouts or Awards 542.10(g)	Promotional Payouts or Awards §2(h)	XX.7	Promotional Payouts or Awards
If a gaming operation offers promotional payouts or		٨	If a gaming operation offers promotional payouts or
awards, the payout form/documentation shall include	payouts or awards, the payout form/documentation	Α	awards, the payout form/documentation must include the
the following information: 542.10(g)(1)	must include the following information:		following information:
Date and time; 542.10(g)(1)(i)	2(h)(1) Date and time;	1	Date and time;
Dollar amount of payout or description of personal	2(h)(2) Dollar amount of payout or description of		Dollar amount of payout or description of personal
property (e.g., jacket, toaster, car, etc.), including fair	personal property (e.g., jacket, toaster, car, etc.),	2	property (e.g., jacket, toaster, car, etc.), including fair
market value; 542.10(g)(1)(ii)	including fair market value;		market value;
Type of promotion; and 542.10(g)(1)(iii)	2(h)(3) Type of promotion; and	3	Type of promotion; and
Signature of at least one employee authorizing and	2(h)(4) Signature of at least one employee	4	Signature of at least one agent authorizing and completing
completing the transaction. 542.10(g)(1)(iv)	authorizing and completing the transaction.	4	the transaction.
[Reserved] 542.10(g)(2)			
Standards for Statistical Reports 542.10(h)	Standards for Statistical Reports §2(i)	<b>XX.8</b>	Standards for Statistical Reports

542	NIGC Class III Guidance	REF	Recommended Language
Records shall be maintained that include win and	2(i)(1) Records must be maintained that include win	Α	Records must be maintained that include win and write by
write by individual writer for each day. 542.10(h)(1)	and write by individual writer for each day.  2(i)(2) Records must be maintained for each keno		individual writer for each day.
	game operated and the total for all keno games		Records must be maintained for each keno game operated
Records shall be maintained that include win, write,	operated that include win, write, and win-to-write	В	and the total for all keno games operated that include win,
and win-to-write hold percentage for: 542.10(h)(2)	hold percentage for the following:		write, and win-to-write hold percentage for the following:
Each shift; 542.10(h)(2)(i)	2(i)(2)(i) Each shift;	1	Each shift;
Each day; 542.10(h)(2)(ii)	2(i)(2)(ii) Each day;	2	Each day;
Month-to-date; and 542.10(h)(2)(iii)	2(i)(2)(iii) Month-to-date; and	3	Month-to-date; and
Year-to-date or fiscal year-to-date as applicable	2(i)(2)(iv) Year-to-date or fiscal year-to-date as	4	
542.10(h)(2)(iv)	applicable	4	Year-to-date or fiscal year-to-date as applicable.
A manager independent of the keno department	2(i)(3) A manager independent of the keno		
shall review keno statistical data at least on a monthly	department must review keno statistical data at least	С	A manager independent of the keno department must
basis and investigate any large or unusual statistical	on a monthly basis and investigate any large or	C	review keno statistical data at least on a monthly basis and
variances. 542.10(h)(3)	unusual statistical variances.		investigate any large or unusual statistical variances.
At a minimum, investigations shall be performed for statistical percentage fluctuations from the base level for a month in excess of $\pm 3\%$ . The base level shall be defined as the gaming operation's win percentage for the previous business year or the previous twelve (12) months. $542.10(h)(4)$	2(i)(4) At a minimum, investigations must be performed for statistical percentage fluctuations from the base level for a month at thresholds established by management and approved by the TGRA. The base level must be defined as the gaming operation's win percentage for the previous business year or the previous twelve (12) months.	D	At a minimum, investigations must be performed for statistical percentage fluctuations from the base level for a month at thresholds established by management and approved by the CNGC. The base level must be defined as the gaming operation's win percentage for the previous business year or the previous twelve (12) months.
Such investigations shall be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request. 542.10(h)(5)	2(i)(5) Such investigations must be documented, maintained for inspection, and provided to the Tribal gaming regulatory authority upon request.	E	Such investigations must be documented, maintained for inspection, and provided to the CNGC upon request.
System Security Standards 542.10(i)		XX.9	System Security Standards
All keys (including duplicates) to sensitive computer			
hardware in the keno area shall be maintained by a		Α	All keys (including duplicates) to sensitive computer
department independent of the keno function.			hardware in the keno area shall be maintained by a
542.10(i)(1)			department independent of the keno function.
Personnel independent of the keno department shall be required to accompany such keys to the keno area and shall observe changes or repairs each time the sensitive areas are accessed. 542.10(i)(2)		В	Agents independent of the keno department shall be required to accompany such keys to the keno area and shall observe changes or repairs each time the sensitive areas are accessed.

542	NIGC Class III Guidance	REF	Recommended Language
Documentation Standards 542.10(j)	Documentation Standards §2(j)	XX.10	Documentation Standards
Adequate documentation of all pertinent keno	2(j)(1) The computer system must generate adequate		The computer system must generate adequate
information shall be generated by the computer	documentation of all pertinent keno information, to		documentation of all pertinent keno information, to
system. 542.10(j)(1)	include the following:		include the following:
This documentation shall be restricted to authorized	include the following.		medde the following.
personnel. 542.10(j)(2)			
The documentation shall include, at a minimum:			The documentation shall be restricted to authorized
542.10(j)(3)		Α	personnel and include, at a minimum:
Ticket information (as described in paragraph (b)(1)	2(j)(1)(i) Ticket information (as described in		Ticket information (as described in Game Standards of this
of this section); 542.10(j)(3)(i)	paragraph (b)(1) of this section);	1	section);
Payout information (date, time, ticket number,	2(j)(1)(ii) Payout information (e.g., date, time, ticket		Payout information (e.g., date, time, ticket number,
amount, etc.); 542.10(j)(3)(ii)	number, amount, etc.);	2	amount, etc.);
Game information (number, ball draw, time, etc.);	2(j)(1)(iii) Game information (e.g., number, ball draw,		
542.10(j)(3)(iii)	time, etc.);	3	Game information (e.g., number, ball draw, time, etc.);
Daily recap information, including: 542.10(j)(3)(iv)	2(j)(1)(iv) Daily recap information, including:	4	Daily recap information, including:
Write; 542.10(j)(3)(iv)(A)	2(j)(1)(iv)(A) Write;	a	Write;
Payouts; and 542.10(j)(3)(iv)(B)	2(j)(1)(iv)(B) Payouts; and	b	Payouts; and
Gross revenue (win): 542.10(j)(3)(iv)(C)	2(j)(1)(iv)(C) Gross revenue (win);	С	Gross revenue (win);
System exception information, including:			
542.10(j)(3)(v)	2(j)(1)(v) System exception information, including:	5	System exception information, including:
Voids; 542.10(j)(3)(v)(A)	2(j)(1)(v)(A) Voids;	a	Voids;
Late pays; and 542.10(j)(3)(v)(B)	2(j)(1)(v)(B) Late pays; and	b	Late pays; and
Appropriate system parameter information (e.g., changes in pay tables, ball draws, payouts over a predetermined amount, etc.); and 542.10(j)(3)(v)(C)	2(j)(1)(v)(C) Appropriate system parameter information (e.g., changes in pay tables, ball draws, payouts over a predetermined amount, etc.); and	С	Appropriate system parameter information (e.g., changes in pay tables, ball draws, payouts over a predetermined amount, etc.); and
Personnel access listing, including: 542.10(j)(3)(vi)	2(j)(1)(vi) Agent access listing, including:	6	Agent access listing, including:
Employee name or employee identification number; and 542.10(j)(3)(vi)(A)	2(j)(1)(vi)(A) Agent name or agent identification number; and	a	Agent name or agent identification number; and
Listing of functions employee can perform or			
equivalent means of identifying same.	2(j)(1)(vi)(B) Listing of functions agent can perform or	b	Listing of functions agent can perform or equivalent means
542.10(j)(3)(vi)(B)	equivalent means of identifying same.	-	of identifying same.
y/\-/\ /\ /	2(j)(2) This document must be restricted to		, <u>, , , , , , , , , , , , , , , , , , </u>
	authorized agents.	В	This document must be restricted to authorized agents.
Keno Audit Standards 542.10(k)			

542	NIGC Class III Guidance	REF	Recommended Language
The keno audit function shall be independent of the			
keno department. 542.10(k)(1)			
At least annually, keno audit shall foot the write on	13(d)(1)(i) At least annually, foot the write on the		
the restricted copy of the keno transaction report for	restricted copy of the keno transaction report for a		
a minimum of one shift and compare the total to the			
total as documented by the computer. 542.10(k)(2)	total as documented by the computer.		
For at least one shift every other month, keno audit	13(d)(1)(ii) For at least one shift every other month,		
shall perform the following: 542.10(k)(3)	perform the following:		
Foot the customer copy of the payouts and trace the	13(d)(1)(ii)(A) Foot the customer copy of the payouts		
total to the payout report; and 542.10(k)(3)(i)	and trace the total to the payout report; and		
total to the payout report, and 342.10(k)(3)(i)	and trace the total to the payout report, and		
Regrade at least 1% of the winning tickets using the	13(d)(1)(ii)(B) Regrade at least 1% of the winning		
payout schedule and draw ticket. 542.10(k)(3)(ii)	tickets using the payout schedule and draw ticket.		
Keno audit shall perform the following: 542.10(k)(4) For a minimum of five games per week, compare the	13(d)(1)(iii) For a minimum of five games per week,		
video recording and/or digital record of the rabbit	compare the video recording and/or digital record of		
ears or wheel to the computer transaction summary;	the rabbit ears or wheel to the computer transaction		
542.10(k)(4)(i)	summary;		
3 12.10(k)( 1)(1)	Sammary,		
Compare net cash proceeds to the audited win/loss	13(d)(1)(iv) Daily, compare net cash proceeds to the		
by shift and investigate any large cash overages or	audited win/loss by shift and investigate any large		
shortages (i.e., in excess of \$25.00); 542.10(k)(4)(ii)	cash overages or shortages (i.e., in excess of \$25.00);		
Review and regrade all winning tickets greater than	13(d)(1)(v) Daily, review and regrade all winning		
or equal to \$1,500, including all forms that document			
that proper authorizations and verifications were	forms that document that proper authorizations and		
obtained and performed; 542.10(k)(4)(iii)	verifications were obtained and performed;		
	·		
Review the documentation for payout adjustments	13(d)(1)(vi) Daily, review the documentation for		
made outside the computer and investigate large	payout adjustments made outside the computer and		
and frequent payments; 542.10(k)(4)(iv)	investigate large and frequent payments;		
Review personnel access listing for inappropriate	13(d)(1)(vii) Weekly, review personnel access listing		
functions an employee can perform; 542.10(k)(4)(v)	for inappropriate functions an agent can perform;		

542	NIGC Class III Guidance	REF	Recommended Language
,	13(d)(1)(viii) Review system exception information on		
for propriety of transactions and unusual occurrences	a daily basis for propriety of transactions and unusual		
including changes to the personnel access listing;	occurrences including changes to the personnel		
542.10(k)(4)(vi)	access listing;		
If a random number generator is used, then at least	13(d)(1)(ix) If a random number generator is used,		
weekly review the numerical frequency distribution	then at least weekly review the numerical frequency		
for potential patterns; and 542.10(k)(4)(vii)	distribution for potential patterns; and		
Investigate and document results of all noted	1 ,		
improper transactions or unusual occurrences.	13(d)(1)(x) Investigate and document results of all		
542.10(k)(4)(viii)	noted improper transactions or unusual occurrences.		
When the keno game is operated by one person:	13(d)(1)(xi) When the keno game is operated by one		
542.10(k)(5)	person:		
The customer copies of all winning tickets in excess	13(d)(1)(xi)(A) The customer copies of all winning		
of \$100 and at least 5% of all other winning tickets	tickets in excess of \$100 and at least 5% of all other		
shall be regraded and traced to the computer payout	winning tickets shall be regraded and traced to the		
report; 542.10(k)(5)(i)	computer payout report;		
The video recording and/or digital record of rabbit	13(d)(1)(xi)(B) The video recording and/or digital		
ears or wheel shall be randomly compared to the	record of rabbit ears or wheel shall be randomly		
computer game information report for at least 10%	compared to the computer game information report		
of the games during the shift; and 542.10(k)(5)(ii)	for at least 10% of the games during the shift; and		
Keno audit personnel shall review winning tickets for	3 3		
proper authorization pursuant to paragraph (e)(6) of	13(d)(1)(xi)(C) Review winning tickets for proper		
this section. 542.10(k)(5)(iii)	authorization.		
In the event any person performs the writer and			
·	13(d)(1)(xii) In the event any person performs the		
described in paragraphs (k)(5)(i) and (ii) of this	writer and deskman functions on the same shift, the		
section (using the sample sizes indicated) shall be	procedures described in paragraphs (4)(xi)(A) and (B)		
performed on tickets written by that person.	of this section (using the sample sizes indicated) shall		
542.10(k)(6)	be performed on tickets written by that person.		
Documentation (e.g., a log, checklist, etc.) that	13(d)(1)(xiii) Documentation (e.g., a log, checklist,		
evidences the performance of all keno audit	etc.) that evidences the performance of all keno audit		
procedures shall be maintained. 542.10(k)(7)	procedures shall be maintained.		

542	NIGC Class III Guidance	REF	Recommended Language
A manager independent of the keno department			
shall review keno audit exceptions, and perform and			
document investigations into unresolved exceptions.			
These investigations shall be documented,			
maintained for inspection, and provided to the Tribal			
gaming regulatory authority upon request.			
542.10(k)(8)			
When a multi-game ticket is part of the sample in			
paragraphs (k)(3)(ii), (k)(5)(i) and (k)(6) of this section,			
the procedures may be performed for ten (10) games			
or ten percent (10%) of the games won, whichever is			
greater. 542.10(k)(9)			
Access 542.10(I)		XX.11	Access
Access to the computer system shall be adequately			
restricted (i.e., passwords are changed at least			Access to the computer system shall be adequately
quarterly, access to computer hardware is physically			restricted (i.e., passwords are changed at least quarterly,
restricted, etc.). 542.10(l)		10110	access to computer hardware is physically restricted, etc.).
Equipment Standards 542.10(m) There shall be effective maintenance planned to	<b>Equipment Standards §2(k)</b> 2(k)(1) There must be effective maintenance planned	XX.12	Equipment Standards
service keno equipment, including computer	to service keno equipment, including computer		There must be effective maintenance planned to service
program updates, hardware servicing, and keno ball	program updates, hardware servicing, and keno ball	^	keno equipment, including computer program updates,
selection equipment (e.g., service contract with	selection equipment (e.g., service contract with	Α	hardware servicing, and keno ball selection equipment
lessor). 542.10(m)(1)	lessor).		(e.g., service contract with lessor).
, , , , ,	2(k)(2) Keno equipment maintenance (excluding		(e.g., service contract with lessor).
shall be independent of the operation of the keno	keno balls) must be independent of the operation of	R	Keno equipment maintenance (excluding keno balls) must
game. 542.15(m)(2)	the keno game.	D	be independent of the operation of the keno game.
game: 3 12.13(m)(2)	and Kerro garne.		be independent of the operation of the kerio game.
Keno maintenance personnel shall report	2(k)(3) Keno maintenance agents must report		
·	irregularities to management independent of the	С	Keno maintenance agents must report irregularities to
of the keno department. 542.10(m)(3)	keno department.		management independent of the keno department.
If the gaming operation utilizes a parcode or			a again a apara a a a a a a apara a
microchip reader in connection with the play of keno,	2(k)(4) If the gaming operation utilizes a barcode or		If the gaming operation utilizes a barcode or microchip
the reader shall be tested at least annually by	microchip reader in connection with the play of keno,		reader in connection with the play of keno, the reader must
personnel independent of the keno department to	the reader must be tested at least annually by agents	D	be tested at least annually by agents independent of the
determine that it is correctly reading the barcode or	independent of the keno department to determine		keno department to determine that it is correctly reading
microchip. 542.10(m)(4)	that it is correctly reading the barcode or microchip.		the barcode or microchip.
Document Retention 542.10(n)	Document Retention §2(I)	XX.13	Document Retention

542	NIGC Class III Guidance	REF	Recommended Language
All documents (including computer storage media) discussed in this section shall be retained for five (5) years, except for the following, which shall be	2(l)(1) All documents (including computer storage media) discussed in this section must be retained for five (5) years, except for the following, which must be	Α	All keno documents (including computer storage media) must be retained for five (5) years, except for the following,
retained for at least seven (7) days: 542.10(n)(1) Video recordings and/or digital records of rabbit ears or wheel; 542.10(n)(1)(i)	retained for at least seven (7) days:  2(l)(1)(i) Video recordings and/or digital records of rabbit ears or wheel;	1	which must be retained for at least seven (7) days: Video recordings and/or digital records of rabbit ears or wheel;
All copies of winning keno tickets of less than \$1,500.00. 542.10(n)(1)(ii)	2(l)(1)(ii) All copies of winning keno tickets of less than \$1,500.00.	2	All copies of winning keno tickets of less than \$1,500.00.
[Reserved] 542.10(n)(2)	Multi wasa Tiskata \$2/m)	VV 14	Multi-race Tickets
Multi-race Tickets 542.10(o) Procedures shall be established to notify keno	Multi-race Tickets §2(m)	XX.14	Wulti-race lickets
personnel immediately of large multi-race winners to ensure compliance with standards in paragraph (e)(5) of this section. 542.10(o)(1)	2(m)(1) Procedures must be established to notify	А	Procedures must be established to notify keno agents immediately of large multi-race winners to ensure
Procedures shall be established to ensure that keno	keno agents immediately of large multi-race winners. 2(m)(2) Procedures must be established to ensure		compliance with prize payout standards.  Procedures must be established to ensure that keno agents
personnel are aware of multi-race tickets still in process at the end of a shift. 542.10(o)(2)	that keno agents are aware of multi-race tickets still in process at the end of a shift.	В	are aware of multi-race tickets still in process at the end of a shift.
Manual Keno 542.10(p)		XX.15	Manual Keno
For gaming operations that conduct manual keno games, alternate procedures that provide at least the level of control described by the standards in this section shall be developed and implemented. 542.10(p)			For gaming operations that conduct manual keno games, alternate procedures that provide at least the level of control described by the standards in this section shall be developed and implemented.
		XX.16	Variances
	2(p) Variance. The operation must establish, as approved by the TGRA, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.		The operation must establish, as approved by the CNGC, the threshold level at which a variance must be reviewed to determine the cause. Any such review must be documented.
		XX.17	Other
	2(n) All relevant controls from § 11, Information and Technology will apply.	Α	All relevant controls of Section 20 Information Technology will apply.
	2(o) Revenue Audit. Standards for revenue audit of keno are contained in § 13, Revenue Audit.	В	Revenue Audit. Standards for revenue audit of keno are contained in Section 21 Revenue Audit.