



**PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL INTERNAL
CONTROL STANDARDS (“TICS”)**

Est. 1995

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

TABLE OF CONTENTS

Section 1..... Definitions

Section 2.....Bingo

Section 3.....Card Games

Section 4.....Pull Tabs

Section 5..... Table Games

Section 6.....Gaming Machines

Section 7..... Cage

Section 8..... Information Technology

Section 9..... Complimentary Services or Items

Section 10..... Drop

Section 11..... Count

Section 12.....Surveillance

Section 13.....Keno

Section 14..... Title 31

Section 15..... Facility Licensing and Health & Safety

Section 16..... Casino Administration

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Section 1

TGRA Definitions

The definitions in this section shall apply to all sections of the gaming enterprise Tribal Internal Control Standards unless otherwise noted. Terms defined in Title XIV of the Pueblo Code and in Section 104 of the Board's regulations have the meaning assigned in the Code and Regulations unless expressly noted herein.

Access Control Card means electronic identification cards, used to enter sensitive gaming areas, based on the authorization level of the user.

Account access card means 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 means 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 earned in a gaming machine that is paid to a customer manually in lieu of a machine payout.

Actual bingo win percentage means the percentage calculated by dividing the bingo win by the bingo sales. Can be calculated for individual prize schedules or type of player interfaces on a per-day or cumulative basis.

Actual hold percentage means 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.

Agent means an employee or licensed person authorized by the gaming enterprise, as approved by the TGRA, designated for certain authorizations, decisions, tasks and actions in the gaming operation. This definition is not intended to eliminate nor suggest that appropriate management contracts are not required, where applicable, as referenced in 25 U.S.C. § 2711.

Aggregation means combining transactions occurring in each department. Cash in transactions are aggregated separately from cash out transactions. Example: A patron's cash in transaction at blackjack table is combined with his/her cash in transaction at the gaming facility cage and cash in transaction at the slot booth.

Amount in means the total value of all financial instruments and cashless transactions accepted by a gaming system.

Amount out means the total value of all financial instruments and cashless transactions paid by a gaming system, plus the total value of manual payments.

Ante means a player's initial wager or predetermined contribution to the pot before the dealing of the first hand.

Automated payout means a payment issued by a machine.

Bank or bankroll means the inventory of cash, coins, chips, checks, tokens, receivables, and customer deposits in the cage, pit area, gaming booths, and on the playing tables, and cash in bank which is used to make change, pay winnings, bets, and pay gaming machine jackpots.

Bill acceptor means the device that accepts and reads cash by denomination in order to accurately register customer credits at a gaming machine.

Bill-in meter means a meter included on a gaming machine accepting cash that tracks the number of bills put in the machine.

Bingo paper means a consumable physical object that has one or more bingo cards on its face.

Bingo sales means the value of purchases made by players to participate in bingo.

Bingo win means the result of bingo sales minus prize payouts.

Birdcage means a clear plastic container used by security to transport chips to and from the cage and table games pit.

Board means the Pueblo of Laguna Gaming Control Board.

Boxman/Boxperson means the first level supervisor who is responsible for directly participating in and supervising the operation and conduct of the craps game only.

Cage means a secure work area within the gaming operation for cashiers and/or a storage area for the gaming enterprise bankroll.

Cage accountability form means an itemized list of the components that make up the cage accountability.

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.

Cash refers to government-minted currency and coin. This includes U.S. minted currency/coin.

Cash equivalents means documents, financial instruments, or anything else of representative value other than cash. A cash equivalent includes, but is not limited to, tokens, chips, coupons, vouchers, payout slips and tickets, and other items to which a gaming operation has assigned an exchange value.

Cash in means cash received from a Patron: currency exchanges, including foreign currency, chip purchases, token purchase, Patron deposits (front money), and safekeeping deposits.

Cash out means cash given to a Patron: currency exchanges, including foreign currency, chip redemptions, cash payments for gaming machine winnings, patron deposits and checks cashed for cash.

Cash transaction log refers to the record maintained at each gaming machine area where a cash in or cash out transactions transaction required by the IRS are recorded. Lesser amount transaction may be recorded if you think the Patron may exceed the reporting threshold.

Cash-out ticket means an instrument of value generated by a gaming machine, representing a cash amount owed to a customer at a specific gaming machine. This instrument may be wagered at other machines by depositing the cash-out ticket in the machine document acceptor.

Cashless system means a system that performs cashless transactions and maintains records of those cashless transactions.

Cashless transaction means a movement of funds electronically from one component to another, often to or from a patron deposit account.

Chips mean cash substitutes, in various denominations, issued by a gaming enterprise and used for wagering.

Class II gaming means a game as described in 25 U.S.C. § 2703(7)(A).

Class II gaming system means 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 NIGC regulations, 25 C.F.R. Part 547.

Coin-in meter means the meter that displays the total amount wagered in a gaming machine that includes coins in and credits played.

Coin meter count machine means a device used in a coin room to count coin.

Coin room means an area where coins and tokens are stored.

Coin room inventory means coins and tokens stored in the coin room that are generally used for gaming machine department operation.

Cold Box means empty Gaming Machine Bill Validator boxes or empty Table Games drop boxes.

Commission means the National Indian Gaming Commission.

Complimentary services and items means services or 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 not limited to travel, lodging, food, beverages, or entertainment expenses.

Count means 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 room means a secured room where the count is performed in which the cash and cash equivalents are counted.

Count team means personnel that perform either the count of the gaming machine drop and/or the table game drop.

Counter game means a game in which the gaming operation is a party to wagers and wherein the gaming enterprise documents all wagering activity. The term includes, but is not limited to, bingo, keno, and pari-mutuel race books. The term does not include table games, card games, and gaming machines.

Coupon means a financial instrument of fixed wagering value, usually paper, 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.

Credit slip means a form used to record the return of chips from a gaming table to the cage.

CTR refers to the Currency Transaction Report prepared by the gaming enterprise or Gaming Operation to fulfill federal reporting requirements when a Patron has a single or aggregate transaction exceeding \$10,000, or any other amount which may be specified by federal law.

Currency Cassette means a compartment that contains a specified denomination of currency. Currency cassettes are inserted into kiosks, allowing them to dispense currency.

Dealer means an agent who operates a game, individually or as a part of a crew, administering house rules and making payoffs.

Dedicated camera means a video camera that continuously records a specific activity.

Document acceptor means the device integrated into each gaming machine that reads bar codes on coupons and cash-out tickets.

Drop means the total amount of financial instruments removed from financial instrument storage components in all gaming systems.

Drop box means a locked container in which cash or cash equivalents are placed at the time of the transaction. Used synonymously with "financial instrument storage component."

Drop box contents keys means the key used to open drop boxes.

Drop box release keys means the key used to release drop boxes from a player interface.

Drop box storage rack keys means the key used to access the storage rack where drop boxes are secured.

Drop period means the period of time that occurs between sequential drops.

Drop proceeds means the total amount of financial instruments removed from drop boxes and financial instrument storage components.

Electronic funds transfer means a transfer of funds to or from a gaming system through the use of a cashless system, which are transfers from an external financial institution.

EPROM means erasable programmable read-only memory or other equivalent game software media.

Exception report means a listing of occurrences, transactions or items that fall outside a predetermined range of acceptability.

Fill means a transaction whereby a supply of chips or coins and tokens is transferred from a bankroll to a table game, coin-operated gaming device, bingo, or keno department.

Fill slip means a document evidencing a fill.

Financial instrument means any tangible item of value tendered in game play including but not limited to bills, coins, vouchers, and coupons.

Financial instrument storage component means any component that stores financial instruments. Used synonymously with "Drop Box."

Flare means the information sheet provided by the manufacturer that sets for the rules of a particular pull tab game and that is associated with a specific deal of pull tabs.

Foot means to add a column of numbers and note the sum at the bottom.

Game server means an electronic selection device, utilizing a random number generator.

Game software means the operational program or programs that govern the play, display of results, and/or awarding of prizes or credits for games.

Gaming enterprise means an enterprise, corporation, or other entity wholly owned by the Pueblo and authorized to conduct gaming activity in any gaming facility. For purposes of the TICS, gaming enterprise often means a Gaming Operation (as defined in Section 104 of the Board's regulations) when required by context. The TGRA seeks to avoid complicating the TICS by using both terms in numerous places..

Gaming equipment means all electronic, electro-mechanical, mechanical or other physical components utilized in the play of games.

Gaming machine Means an electronic or electromechanical machine that allows a player to play games of chance, some of which may be affected by skill, which contains a microprocessor with random number genitor capability for outcome selection or computer terminal that accesses an outcome that is subsequently and randomly selected in drawings that are electronically conducted by central computer or other such methods of chance selection, whether mechanical or electronic. The machine is activated by the insertion of cash or cash equivalents and which awards cash, cash equivalents, merchandise, or a written statement of the player's accumulated credits, which written statements may be redeemable for cash.

Gaming machine analysis report means a report prepared that compares theoretical to actual hold by a gaming machine on a monthly or other periodic basis.

Gaming machine booths and change banks means a booth or small cage in the gaming machine area, used to provide change to players, store change aprons and extra coin, and account for jackpot and other payouts.

Gaming machine count means the total amount of coins, tokens, and cash removed from a gaming machine. The amount counted is entered on the Gaming Machine 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 pay table means the reel strip combinations illustrated on the face of the gaming machine that can identify payouts of designated coin amounts.

Gaming promotion means any promotional activity or award that required game play as a condition of eligibility.

Gaming system for purposes of the TICS means one or more gaming machines and/or other hardware and all related software that together make up a game. For example, a wide area progressive game often involves multiple gaming machines in a gaming facility, along with network communication equipment and centralized computer hardware and software to track both the play on the gaming machine itself and the progressive aspect of the game. That is an example of a gaming system. The definition of "Gaming Systems" in the Board's regulations is comprised of each gaming system and also additional hardware, software, and network communication equipment used to operate, administer, monitor, and account for Gaming Activity.

Generally Accepted Accounting Principles (GAAP) means a widely accepted set of rules, conventions, standards, and procedures for reporting financial information, as established by the Financial Accounting Standards Board (FASB), including, but not limited to, the standards for casino accounting published by the American Institute of Certified Public Accountants (AICPA).

Generally Accepted Auditing Standards (GAAS) means a widely accepted set of standards that provide a measure of audit quality and the objectives to be achieved in an audit, as established by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA).

Governmental Accounting Standards Board (GASB) means generally accepted accounting principles used by state and local governments.

Graveyard shift means any hours worked between 11 p.m. and 8 a.m.

Gross gaming revenue means annual total amount of cash wagered on class II and class III games and admission fees (including table or card fees), less any amounts paid out as prizes or paid for prizes awarded.

Hold means the relationship of win to coin-in for gaming machines and win to drop for table games.

Hot Box means full Gaming Machine Bill Validator Boxes or Table Games drop boxes.

Independent means the separation of functions so that the person or process monitoring, reviewing or authorizing the controlled transaction(s) is separate from the persons or process performing the controlled transaction(s).

Independent testing laboratory means a private laboratory that is registered by the NIGC to inspect and certify games, gaming devices, associated equipment, cashless wagering systems, inter-casino linked systems, mobile gaming systems or interactive gaming systems, and any components thereof and modifications thereto, and to perform such other services as the Board or NIGC may request.

Internal audit means individuals who perform an audit function of a gaming enterprise that are independent of the department subject to audit. Independence is obtained through the organizational reporting relationship, as the internal audit department shall not report to management of the gaming enterprise. Internal audit activities should be conducted in a manner that permits objective evaluation of areas examined. Internal audit personnel may provide audit coverage to more than one enterprise within the Pueblo's gaming enterprise holdings.

Internal auditor means the person(s) who perform an independent audit. Independence is obtained through the organizational reporting relationship, as the internal audit department must not report to management of the gaming enterprise. Internal audit personnel may provide audit coverage to more than one operation within the Pueblo's gaming enterprise holdings.

Inter-tribal prize pool means a fund to which multiple tribes contribute from which prizes are paid to winning players at a participating tribal gaming facility and which is administered by one of the participating tribes or a third party, (e.g. progressive prize pools, shared prize pools, etc.).

Jackpot payout means the portion of a jackpot paid by Gaming Machine Department personnel. The amount is usually determined as the difference between the total posted jackpot amount and the coins paid out by the machine. It may also be the total amount of the jackpot.

Kiosk means a device capable of redeeming vouchers and/or wagering credits or initiating electronic transfers of money to or from a patron deposit account.

Known Customer means a patron for whom the cage and credit department has a written record of the patron's name, address, social security number, and Player's Club account number. A known customer does not include someone you simply know.

Lammer means a type of chip used to evidence transfers between table banks and card room banks.

Linked electronic game means any game linked to two (2) or more facilities that are physically separate.

Manual payout means any non-automated payout.

Master game sheet means a form used to record, by shift and day, each table game's winnings and losses. This form reflects the opening and closing table inventories, the fills and credits, and the drop and win.

Mechanical coin counter means a device used to count coins that may be used in addition to or in lieu of a coin weight scale.

Meter means an electronic (soft) or mechanical (hard) apparatus in a gaming machine. May record the number of coins wagered, the number of coins dropped, the number of times the handle was pulled, or the number of coins paid out to winning players.

MICS means the NIGC Minimum internal control standards for Class II Gaming and the Class III guidance.

Motion activated dedicated camera means a video camera that, upon its detection of activity or motion in a specific area, begins to record the activity or area.

Multi-game machine means a gaming machine that includes more than one type of game operation.

Network communication equipment means a device or collection of devices that controls data communication in a system including, but not limited to, cables, switches, hubs, routers, wireless access points, landline telephones and cellular telephones.

NIGC means the National Indian Gaming Commission.

NMGCB means the New Mexico Gaming Control Board.

Non-cashable credit means credits given by an operator to a patron; placed on a gaming system through a coupon, cashless transaction, or other approved means; and capable of activating play but not being converted to cash.

Order for credit means a form that is used to request the transfer of chips or markers from a table to the cage. The order precedes the actual transfer transaction that is documented on a credit slip.

Par percentage means the percentage of each dollar wagered that the house wins (i.e. gaming enterprise advantage).

Par sheet means a specification sheet for a gaming machine that provides machine hold percentage, model number, hit frequency, reel combination, number of reels, number of coins/credits that can be accepted, and reel strip listing.

Patron means a person who is a customer or guest of the gaming enterprise and may interact with a Class II or Class III game. Also may be referred to as a “player.”

Patron deposit account means an account maintained on behalf of a patron, for the purpose of depositing and withdrawing cashable funds for the primary purpose of interacting with a gaming activity.

Photo Identification Credentials means items which can be examined to verify the identity of a patron. The following are examples of these credentials: a valid current driver’s license, a valid current government issued identification card, and a valid current passport or alien registration card.

PIN means the personal identification number used to access a player’s account.

Pit podium means a stand located in the middle of the tables used by gaming enterprise supervisory personnel as a workspace and a record storage area.

Pit supervisor means the agent who supervises all games in a pit.

Player interface means any component(s) of a gaming system, including an electronic or technologic aid (not limited to terminals, player stations, handhelds, fixed units, etc.), that directly enables player interaction in a game.

Player tracking system means a system typically used by a gaming operation to record the amount of play of an individual patron.

Primary and secondary jackpots means promotional pools offered at certain card games that can be won in addition to the primary jackpot.

Prize payout means a transaction associated with a winning event or qualifying event in a game.

Prize schedule means a set of prizes available to players for achieving pre-designated patterns in game(s).

Progressive gaming machine means a gaming machine, with a payoff indicator, in which the payoff increases as it is played (i.e. a deferred payout). The payoff amount is accumulated, displayed on a machine, and will remain until a player lines up the jackpot symbols that result in the progressive amount being paid.

Progressive prize means a prize that increases by a selectable or predefined amount based on play of games.

Progressive table games means table games that offer progressive jackpots.

Promotional account means a file, record, or other data structure that records transactions involving a patron or patrons that are not otherwise recorded in a patron deposit account.

Promotional payout means merchandise or awards given to players by the gaming enterprise based on a wagering activity.

Promotional prize payout means the merchandise or awards given to players by the gaming operation which is based on gaming activity.

Promotional progressive pots and/or pools means funds contributed to a table game or card game by and for the benefit of players. Funds are distributed to players based on a predetermined event.

Rabbit ears means a device, generally V-shaped, that hold the numbered balls selected during a keno or bingo game so that the numbers are visible to players and agents.

Rake means a commission charged by the house for maintaining or dealing a game such as poker.

Rake circle means the area of a table where rake is placed.

Random number generator (RNG) a software module, hardware component or combination of these designed to produce outputs that are effectively random.

Real time means recording at least 30 fps (frames per second).

Reel symbols means symbols listed on reel strips of gaming machines.

Runner means a gaming agent who transports chips/cash to or from a gaming table and a cashier.

Series number means the unique identifying number printed on each sheet of bingo paper that identifies the bingo paper as a series or packet. The series number is not the free space or center space number located on the bingo paper.

Server means a computer which controls one or more applications or environments.

Shift means a time period, unless otherwise approved by the TGRA, not to exceed 24 hours.

Shill means an agent financed by the gaming operation and acting as a player.

Short pay means the payment of the unpaid balance of an incomplete payout by a player interface.

SICS (System of Internal Control Standards) means an overall operational framework for a gaming operation that incorporates principles of independence and segregation of function, and is comprised of written policies, procedures, standard practices, and controls based on overarching regulatory standards specifically designed to create a system of checks and balances to safeguard the integrity of gaming and protect the gaming enterprise's assets from unauthorized access, misappropriation, forgery, theft, or fraud.

Slot/Slots mean gaming machine/gaming machines.

Smart card means a card with embedded integrated circuits that possesses the means to electronically store or retrieve account data.

Soft count means the count of the contents in a drop box or a bill acceptor canister.

Statistical drop means total amount of money, chips, and tokens contained in the drop boxes, plus pit credit issued, minus pit credit payments in cash in the pit.

Statistical win means closing bankroll, plus credit slips for cash, chips, or tokens returned to the cage, plus drop, minus opening bankroll, minus fills to the table, plus marker credits.

Sufficient clarity means use of monitoring and recording at a minimum of thirty (30) frames per second and at a resolution and with illumination sufficient to clearly identify the intended activity, person, object, or location.

Supervisory agent means an agent who, whether as a permanent job function or for a designated shift or portion thereof, is appointed to perform the oversight, monitoring, and approval functions required by these TICS, the Board's regulations, NIGC regulations, the Pueblo Code, or other applicable law. While functioning in a supervisory capacity, an agent may not also perform functions over which the agent exercises supervisory authority.

Surveillance operating room(s) means the secured area(s) where surveillance takes place and/or where active surveillance equipment is located.

Surveillance system means a system of video cameras, monitors, recorders, video printers, switches, selectors, and other ancillary equipment used for surveillance.

Table games means games that are banked by the house or a pool whereby the house or the pool pays all winning bets and collects from all losing bets.

Table inventory means the total coins and chips at a table.

Table inventory form means the form used by gaming enterprise supervisory personnel to document the inventory of chips, coins, and tokens on a table at the beginning and ending of a shift.

Table tray means the container located on gaming tables where chips, coins, or cash that are used in the game are stored.

TGRA means the Tribal Gaming Regulatory Authority, which is the entity authorized by tribal law to regulate gaming conducted pursuant to the Indian Gaming Regulatory Act, subject to the ultimate supervision of the Pueblo of Laguna Gaming Control Board.

Theoretical hold means the intended hold percentage or win of an individual gaming machine as computed by reference to its payout schedule and reel strip settings or EPROM.

Theoretical hold worksheet means a worksheet provided by the manufacturer for all gaming machines that indicate the theoretical percentages that the gaming machine should hold based on adequate levels of coin-in. The worksheet also indicates the reel strip settings, number of credits that may be played, the payout schedule, the number of reels and other information descriptive of the particular type of gaming machine.

TICS means Tribal Internal Control Standards established by the TGRA that are at least equal to or exceeds the NIGC MICS.

Tier A means gaming enterprises with annual gross gaming revenues of more than \$1 million but not more than \$8 million.

Tier B means gaming enterprises with annual gross gaming revenues of more than \$8 million but not more than \$15 million.

Tier C means gaming enterprises with annual gross gaming revenues of more than \$15 million.

Tokens means a coin-like cash substitute, in various denominations, used for gambling transactions.

Vault means a secure area where cash and cash equivalents are stored.

Voucher means a financial instrument of fixed wagering value, usually paper, that can only be used to acquire an equivalent value of cashable credits or cash through interaction with a voucher system.

Voucher system means 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.

Wide area progressive gaming machine means a progressive gaming machine that is linked to machines in other operations, and play on the machines affect the progressive amount. As wagers are placed, the progressive meters on all of the linked machines increase.

Win means the net win resulting from all gaming activities. Net win results from deducting all gaming losses from all wins prior to considering associated operating expenses.

Win-to-write hold percentage means win divided by write to determine hold percentage.

Write means the total amount wagered in bingo and pull tab operations.

Writer means an agent who writes keno or bingo tickets. A keno writer usually also makes payouts.

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Section 2:

Tribal Internal Control Standards for Bingo

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- A. For any computer application utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards of this section, as approved by the TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen or alternative technology approved by TGRA to ensure the legitimacy of the currency.

IV. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the paper room are required to complete the paper access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- C. For doors with magnetic locks, the standard in IV.B above shall not apply if authorized agents are required to use their access control card to enter **and** exit, **and** if the magnetic swipe system has the capability to log agents entering and exiting.
- D. In the event of a magnetic door system failure, the standard in IV.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

V. Personnel Standards:

- A. The Bingo Department shall ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of employee; and

6. Signature of trainer/supervisor confirming the employee's competence in the area(s) trained.
- B. Supervision must be provided for bingo operations by an agent(s) with authority equal to or greater than those being supervised.

VI. Bingo Cards:

- A. Physical bingo card inventory controls must address the placement of orders, receipt, storage, issuance, removal and cancellation of bingo card inventory to ensure that:
 1. The bingo card inventory can be accounted for at all times; and;
 2. Bingo cards have not been marked, altered, or otherwise manipulated.

VII. Receipt from Supplier:

- A. When bingo card inventory is initially received from the supplier, it must be inspected (without breaking the factory seals, if any), counted, inventoried and secured by an authorized agent;
- B. Bingo card inventory records must include:
 1. Date received;
 2. Quantities received;
 3. Series number(s) of the cards received; and
 4. Name of the individual conducting the inspection.

VIII. Storage:

- A. Bingo cards must be maintained in a secure location, accessible only to authorized agents, and with surveillance coverage adequate to identify persons accessing the storage area.

IX. Issuance and Returns of Inventory:

- A. 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;
 2. Issuance of inventory from a staging area to the cage or sellers;
 3. Return of inventory from a staging area to storage; and
 4. Return of inventory from cage or seller to staging area or storage.

X. Cancellation and Removal:

- A. Bingo cards removed from inventory that are deemed out of sequence, flawed, or misprinted and not returned to the supplier must be cancelled and removed from active inventory to ensure that they are not utilized in the play of a bingo game.
- B. Bingo cards that are removed from inventory and returned to the supplier or cancelled must be logged as removed from inventory.
- C. Bingo cards associated with an investigation must be retained intact outside of the established removal and cancellation policy.
 1. Cards will be placed in a sealed container with an approved TGRA chain of evidence form attached.

XI. Bingo Logs:

- A. The inventory of bingo cards must be tracked and logged from receipt until use or permanent removal from inventory.
- B. The bingo card inventory record(s) must include:
 1. Date;
 2. Series number of the bingo paper;
 3. Shift or Session;
 4. Time;
 5. Location;
 6. Inventory received, issued, removed and returned;

7. Signature of agent performing transaction;
8. Signature of agent performing the reconciliation;
9. Any variance;
10. Beginning and ending inventory; and
11. Description of inventory transaction being performed.

XII. Bingo Card Sales:

- A. An agent who sells bingo cards must not be the sole verifier of bingo cards for prize payouts.
- B. In order to adequately record, track, and reconcile all manual sales of bingo cards, the following information must be documented:
 1. Date;
 2. Shift or Session;
 3. Quantity of bingo cards issued, sold, and returned;
 4. Dollar amount of bingo card sales;
 5. Signature, and employee gaming license number of the agent preparing the record; and
 6. Signature, initials, or employee gaming license number of an independent agent who verified the bingo cards returned to inventory and dollar amount of bingo card sales.
- C. No person shall have unrestricted access to modify bingo sales records.
- D. An authorized agent independent of the seller must perform the following standards for each seller at the end of each session:
 1. Reconcile the documented total dollar amount of cards sold to the documented quantity of cards sold;
 2. Note any variances; and
 3. Appropriately investigate any noted variances with the results of the investigation documented.
- E. In order to adequately record, track and reconcile sales of Class II gaming system 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 limitations(s) must be noted):
 1. Date;
 2. Time;
 3. Number of bingo cards sold;
 4. Dollar amount of bingo cards sales; and
 5. Amount in, amount out and other associated meter information.

XIII. Voiding Bingo Cards:

- A. 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;
 2. Adjustments to bingo card sales to reflect voids;
 3. Adjustment to bingo card inventory;
 4. Documentation of the reason for the void; and
 5. Authorization for all voids.

XIV. Draw, Verification and Display of Draw:

- A. 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.
 1. Verification of physical objects must be performed by two agents before the start of the first bingo game/session; and
 2. At least one of the verifying agents must be a supervisory agent or an agent independent of the Bingo Department.
- B. Where the selection is made through an electronic aid, certification in accordance with 25 CFR 547.14 is acceptable for verifying the randomness of the draw and satisfies the requirements of paragraph (A) of this part.
- C. Controls must be established and procedures implemented to accurately record the draw, which includes the order and identity of the objects drawn, for dispute resolution purposes.

- D. Controls must be established and procedures implemented to ensure that:
 - 1. The identity of each object drawn is accurately recorded and transmitted to the participants. The procedures must identify the method used to ensure the identity of each object drawn; and
 - 2. For all games offering a prize payout of \$1,200 or more, as the objects are drawn, the identity of each object must be immediately recorded and maintained for a minimum of 24 hours.

XV. Prize Payout:

- A. Controls must be established and procedures implemented for cash or cash equivalents that address the following:
 - 1. Identification of the agent authorized (by position) to make a payout;
 - 2. Predetermined payout authorization limits (by position); and
 - 3. Documentation procedures ensuring separate control of the cash accountability functions.
- B. 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);
 - 2. Objects drawn; and
 - 3. The previously designated arrangement of number or destination on such cards, as described in 25 U.S.C. 2703(7)(A).
- C. 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.
- E. For validation of 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.
- F. For validation of automated payouts, the system may serve as the sole validator of the claim.
- G. For verification of 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.
- H. For verification of automated payouts, the system may serve as the sole verifier that the pattern has been achieved on the winning card.
- 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.
- J. Manual prize payouts at or 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 agent or manager independent of the operation of Class II Gaming System bingo:
 - 1. \$5,000 for a Tier A facility;
 - 2. \$10,000 at a Tier B facility;
 - 3. \$20,000 for a Tier C facility; or
 - 4. \$50,000 for a Tier C facility with over \$100,000,000 in gross gaming revenues.
- K. The predetermined thresholds, whether set at the MICS level or lower, must be authorized by management, approved by the TGRA, documented, and maintained.
- L. 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.
- M. Payout records, including manual payout records, must include the following information:
 - 1. Date and time;
 - 2. Amount of the payout (alpha & numeric for player interface payouts); and
 - 3. Bingo card identifier or player interface identifier.
- N. Manual Payout records must also include the following:
 - 1. Game name or number;
 - 2. Description of pattern covered, such as cover-all or four corners;
 - 3. Signature of all, but not less than two, agents involved in the transaction;
 - 4. For override transactions, verification by a supervisory agent or manager independent of the transaction; and
 - 5. Any other information necessary to substantiate the payout.

XVI. Cash and Cash Equivalent Controls:

- A. 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.
- B. Unexplained variances must be documented and maintained.
- C. Unverified transfers of cash or cash equivalents are prohibited.
- D. Procedures must be implemented to control cash or cash equivalents based on the amount of the transaction that include documentation by shift, session or relevant time period of the following:
 - 1. Inventory, including any increases or decreases;
 - 2. Transfers;
 - 3. Exchanges, including acknowledging signatures or initials; and
 - 4. Resulting variances.
- E. 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 persons and reconciled to the recorded amount.

XVII. Technologic Aids to the Play of Bingo:

- A. 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 that must include the following:
 - 1. A communication procedure must be established between the supplier, the gaming enterprise, and the TGRA to properly control the shipping and receiving of all software and hardware components that must include:
 - a. Notification of pending shipments must be provided to the TGRA by the gaming enterprise;
 - b. Certification in accordance with 25 CFR part 547;
 - c. Notification from the supplier to the TGRA, or the gaming enterprise as approved by the TGRA, of the shipping date and expected date of delivery that must include:
 - i. Name and address of the supplier;
 - ii. Description of shipment;
 - iii. For player interfaces: a serial number;
 - iv. For software: software version and description of software;
 - v. Method of shipment; and
 - vi. Expected date of delivery.
 - 2. Procedures must be implemented for the exchange of Class II gaming system components for maintenance and replacement.
 - 3. Class II gaming system components must be shipped in a secure manner to deter unauthorized access.
 - 4. The TGRA, or its designee, must receive all Class II gaming system components and game play software packages, and verify the contents against the shipping notification.
 - 5. Controls must be established to restrict access to the Class II gaming system components, as set forth in §8, Information Technology.
 - 6. The gaming enterprise must maintain the following records, as applicable, related to installed game servers and player interfaces:
 - a. Date placed into service;
 - b. Date made available for play;
 - c. Supplier;
 - d. Software version;
 - e. Serial Number;
 - f. Game title;
 - g. Asset and/or location number;
 - h. Seal number; and
 - i. Initial meter reading.
 - 7. Procedures must be implemented for auditing such records in accordance with POL TICS §20.IX, Accounting Standards.
 - 8. Procedures must be implemented for system software verifications that 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.

9. A TGRA agent must perform system software signature verification(s) to verify that only approved software is installed.
10. Procedures must be implemented for investigating and resolving any software verification variances.
11. Internal audits must be conducted as set forth in the POL TICS §20.IX, Accounting Standards. Such audits must be documented.
12. Testing must be completed during the installation process to verify that the player interface has been properly installed. This must include testing of the following, as applicable:
 - a. Communication with the Class II gaming system;
 - b. Communication with the accounting system;
 - c. Communication with the player tracking system;
 - d. Currency and vouchers to bill acceptor;
 - e. Voucher printing;
 - f. Meter incrementation;
 - g. Pay table, for verification;
 - h. Player interface denomination, for verification;
 - i. All buttons and controls, to ensure that all are operational and programmed properly;
 - j. System components, to ensure that they are safely installed at location; and
 - k. Locks, to ensure that they are secure and functioning.
13. The TGRA or the operation must verify that all game rules and disclaimers are displayed at all times or made readily available to the player upon request that include:
 - a. "Malfunctions void all prizes and plays" or equivalent; and
 - b. "Actual Prizes Determined by Bingo (or other applicable Class II game) Play. Other Displays for Entertainment Only" or equivalent.
14. TGRA approval of all technologic aides before they are offered for play.
15. All class II gaming equipment must comply with NIGC MICS 25 CFR part 547, Minimum Technical Standards for Gaming Equipment Used With the Play of Class II Games.

XVIII. Independent Testing Laboratories Inspection and Certification Standards

- A. Each registered independent testing laboratory shall provide the person seeking inspection and certification with the results of the testing and certification process. The results shall include:
 1. A statement that the certification process was conducted in accordance with the requirements of the Nevada Gaming Commission and New Mexico Gaming Control Board in existence at the time of testing and the regulations adopted thereunder, and all technical standards, control standards, control procedures, policies, and industry notices implemented or issued to the best of the registered independent testing laboratory's knowledge and belief.
 2. The name of the registered independent testing laboratory that performed the testing;
 3. The registration number of the registered independent testing laboratory that performed the testing;
 4. The location or locations of the facility or facilities the registered independent testing laboratory used to perform the testing;
 5. The internal reference number for the registered independent testing laboratory;
 6. The date the product was submitted to the registered independent testing laboratory for regulatory certification;
 7. The start and end dates of the product testing performed;
 8. An attestation statement that the product source code was reproduced;
 9. The part and version number or numbers of the product submitted for certification;
 10. The unseeded HMAC-SHA1 signature of all applicable files, or other method;
 11. A description of the configuration of the product as tested;
 12. A description of the scope of testing performed;
 13. Identification of the Nevada approved testing document(s) by name and version number;
 14. A description of any issues found during the testing process and the resolution thereof;
 15. Identification of any modification that was not identified by the manufacturer;
 16. A complete description of the testing that was conducted as part of the certification of the product by Nevada and NM standards mentioned above; and
 17. Any additional information regarding the testing of the product that the registered independent testing laboratory considers appropriate.

XIX. Operations:

- A. Procedures must be implemented to investigate, document and resolve malfunctions that must address the following:
 - 1. Determination of the event causing the malfunction;
 - 2. Review of relevant records, game recall, reports, logs, surveillance records;
 - 3. Repair or replacement of the Class II gaming component; and
 - 4. Verification of the integrity of the Class II gaming component before restoring it to operation.
- B. Procedures must be implemented to retire or remove any or all associated components of a Class II gaming system from operation that must include the following:
 - 1. For player interfaces and components that accept cash or cash equivalents:
 - a. Coordinate with the drop team to perform a final drop;
 - b. Collect final accounting information such as meter readings, drop and payouts;
 - c. Remove and/or secure any or all associated equipment such as locks, card reader, or ticket printer from the retired or removed component; and
 - d. Document removal, retirement, and/or destruction.
 - 2. For removal of software components:
 - a. Purge and/or return the software to the license holder; and
 - b. Document the removal.
 - 3. For other related equipment such as blowers, cards, interface cards:
 - a. Remove and/or secure equipment; and
 - b. Document the removal or securing of equipment.
 - 4. For all components:
 - a. Verify that unique identifiers, and descriptions of removed/retired components are recorded as part of the retirement documentation; and
 - b. Coordinate with the accounting department to properly retire the component in the system records.
 - 5. Where the TGRA authorizes destruction of any Class II gaming system components, procedures must be developed to destroy such components that must include the following:
 - a. Methods of destruction;
 - b. Witness or surveillance of destruction;
 - c. Documentation of all components destroyed; and
 - d. Signatures of agent(s) destroying components attesting to destruction.

XX. Promotions and Player Tracking:

- A. The rules of each gaming promotion must be displayed or made readily available to patron upon request. Gaming promotions rules require TGRA approval and must include the following:
 - 1. The rules of play;
 - 2. The nature and value of the associated prize(s) or cash award(s);
 - 3. Any restrictions or limitations on participant eligibility;
 - 4. The date(s), time(s), and location(s) for the associated promotional activity or activities;
 - 5. Any other restrictions or limitations, including any related to the claim of prizes or cash awards;
 - 6. The announcement date(s), time(s), and location(s) for the winning entry or entries; and
 - 7. Rules governing promotions offered across multiple gaming facilities, third party sponsored promotions, and joint promotions involving third parties.
- B. 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 on a monthly basis independent of the department initiating the change.
- C. All other changes to the player tracking system must be appropriately documented.
- D. The gaming enterprise 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.

XXI. Voucher Systems:

- A. Controls must be established and procedures implemented to:
 - 1. Verify the authenticity of each voucher redeemed.
 - 2. If the voucher is valid, the patron is paid the appropriate amount.
 - 3. Document the payment of a claim on a voucher that is not physically available or a voucher that cannot be validated such as mutilated, expired, lost, or stolen voucher.
 - 4. Retain Documentation for reconciliation purposes.
 - 5. For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.
- B. Vouchers paid during a period while the voucher system is temporarily out of operation must be marked "paid" by the cashier.
- C. 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.
- D. Paid vouchers are maintained in the cashier's accountability for reconciliation purposes.
- E. Unredeemed vouchers can only be voided in the voucher system by supervisory employees. The accounting department will maintain the voided voucher, if available.

XXII. Information Technology:

- A. All relevant controls from Section 8, Information and Technology will apply.

XXIII. Revenue Audit:

- A. Audits must be performed by agent(s) independent of the transactions being audited.
- B. The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.
- C. At the end of each month, verify the accuracy of the ending balance in the bingo control log by reconciling it with the bingo paper inventory and investigate and document any variance noted.
- D. Daily, reconcile supporting records and documents to summarized paperwork or electronic records (e.g. total sales and payouts per shift and/or day).
- E. At least monthly, review variances related to bingo accounting data in accordance with an established threshold, which must include, at a minimum:
 - 1. variance(s) noted by the Class II gaming system for cashless transactions in and out;
 - 2. Electronic funds transfer in and out;
 - 3. External bonus payouts;
 - 4. Vouchers out and coupon promotion out; and
 - 5. Investigate and document any variance noted.
- F. At least monthly, review statistical reports for any deviations from the mathematical expectations exceeding plus or minus 3% and investigate and document any deviations compared to the mathematical expectations required to be submitted per (H) of this part.
- G. The operation must establish, as approved by the TGRA, the threshold level at which a variance, including deviations from the mathematical expectations required by (H) of this part, will be reviewed to determine the cause. Any such review must be documented.
- H. No Class II gaming system may cheat or mislead users.
 - 1. All prizes advertised must be available to win during the game.
 - 2. A test laboratory must calculate and/or verify the mathematical expectations of game play, where applicable, in accordance with the manufacturer stated submission.
 - 3. The results must be included in the test laboratory's report to the TGRA.
 - 4. At the request of the TGRA, the manufacturer must also submit the mathematical expectations of the game play to the TGRA.
- I. At least monthly, take a random sample foot of 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.
- J. For gaming promotions and player tracking:
 - 1. At least monthly, review promotional payments, drawings, and giveaway programs to verify payout accuracy and proper accounting treatment in accordance with the rules provided to patrons.

2. At least monthly, for computerized player tracking systems, perform the following procedures:
 - a. Review authorization documentation for all manual point additions/deletions for propriety;
 - b. Review exception reports, including transfers between accounts; and
 - c. Review documentation related to access to inactive and closed accounts.
 3. At least annually, all computerized player tracking systems must be reviewed by agent(s) independent of the individuals that set up, maintain, or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization. The independent agent(s) must document and maintain the test results.
- K. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

XXIV. Dispute Resolution:

- A. If the gaming enterprise or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming enterprise and the patron are unable to resolve the dispute, and the dispute involves:
 1. Less than \$500.00; The gaming enterprise shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 2. At least \$500.00; The gaming enterprise shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming enterprise fails to provide a timely notice of dispute to the TGRA, the gaming enterprise shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 3:

Tribal Internal Control Standards for Card Games

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen to ensure the legitimacy of the currency.
- B. Except as specifically permitted by the TGRA, no Person shall possess with the intent to use, or actually use, at any table game, either by himself or in concert with others, any calculator, computer, communications device, other electronic, electrical, or mechanical device, or written material to assist in projecting an outcome at any table game or in keeping track of or analyzing the cards having been dealt, the changing probabilities of any card game, or the playing strategies to be utilized in any card game.
 - 1. For Baccarat:
 - a. If permitted by the gaming operation rules in force at a given table, players of baccarat and its variations may use a tracking sheet or similar paper to record manually the cards dealt in a shoe. No electronic device of any kind may be used in conjunction with the paper record created.

IV. Standards for Drop and Count:

- A. The standards for the collection of the card game drop and the count thereof shall comply with Sections 10 (Drop) and 11 (Count), as applicable.

V. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the card & dice room are required to complete the card & dice room access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.

- C. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in V.B above shall not apply.
- D. In the event of a magnetic door system failure, the standard in V.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

VI. Personnel Standards:

- A. The Card Game Department shall strive to ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of employee; and
 - 6. Signature of trainer/supervisor acknowledging the employees competence in the area(s) trained.
- B. No dealer who has been promoted to a supervisor or a dual-rate supervisor shall function in that capacity until he/she has received and passed documented Title 31 training.

VII. Supervision:

- A. Supervision must be provided during card room operations by an agent(s) with authority equal to or greater than those being supervised.
- B. A dealer may function as a supervisor if not dealing the game.

VIII. Exchanges or Transfers:

- A. Exchanges between table banks and the main card room bank (or cage, if a main card room bank is not used) must be authorized by a supervisor.
 - 1. All exchanges must be evidenced by the use of a lammer unless the exchange of chips, tokens, and/or cash takes place at the table.
 - 2. If table banks are maintained at an imprest level and runners are used for the exchanges at the table, no supervisory authorization is required.
- B. Exchanges from the main card room bank (or cage, if a main card room bank is not used) to the table banks must be verified by the card room dealer and the runner.
- C. Transfers between the main card room bank and the cage must be properly authorized and documented.

IX. Standards for Playing Cards:

- A. New and used playing cards must be maintained in a secure location, with appropriate surveillance coverage, and accessible only to authorized agents.
- B. Used playing cards that are not to be re-used must be properly cancelled and removed from service to prevent re-use.
 - 1. The removal and cancellation procedure requires TGRA review and approval.
- C. Playing cards associated with an investigation must be retained intact and outside of the established removal and cancellation procedure.
- D. A card control log shall be maintained that documents when cards are received on site, distributed to and returned from tables and removed from play by the gaming enterprise.
 - 1. Cards will be placed in a sealed container with an approved TGRA chain of evidence form attached.

X. Plastic Cards:

- A. If the gaming enterprise uses plastic cards for card games other than blackjack (not plastic-coated cards), the cards may be used up to three (3) months if the plastic cards are routinely inspected and washed or cleaned in a manner and time frame approved by the TGRA.

XI. Shill Funds:

- A. Issuance of shill funds shall have the written approval of the supervisor.
- B. Shill fund returns shall be recorded and verified on the shill sign-out form.
- C. The replenishment of shill funds shall be documented.

XII. Standards for Reconciliation of Card Room Bank:

- A. Two agents, one of whom must be a supervisory agent, must independently count the table inventory at the opening and closing of the table and record the following information:
 - 1. Date;
 - 2. Shift;
 - 3. Table number;
 - 4. Amount by denomination;
 - 5. Amount in total; and
 - 6. Signatures of both agents.

XIII. Posted Rules:

- A. The rules must be displayed or available for patron review at the gaming operation, including rules governing contests, prize payouts, fees, the rake collected, and the placing of antes.

XIV. Standards for Promotional Progressive Pots and Pools:

- A. All funds contributed by players into the pools must be returned when won in accordance with the posted rules with no commission or administrative fee withheld.
 - 1. The payout may be in the form of personal property, such as a car.
 - 2. A combination of promotion and progressive pool may be offered.
- B. The conditions for participating in current card game promotional progressive pots and/or pools must be prominently displayed or available for patron review at the gaming operation.
- C. Individual payouts for card game promotional progressive pots and/or pools that are \$600 or more must be documented at the time of the payout to include the following:
 - 1. Patron's name;
 - 2. Date of payout;
 - 3. Dollar amount of payout and/or nature and dollar value of any non-cash payout;
 - 4. The signature of the agent completing the transaction attesting to the disbursement of the payout; and
 - 5. Name of contest/tournament.
- D. If the cash (or cash equivalent) payout for the card game promotional progressive pot and/or pool is less than \$600, documentation must be created to support accountability of the bank from which the payout was made.
- E. 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:
 - 1. The amount of funds to be contributed from each pot;
 - 2. What type of hand it takes to win the pool;
 - 3. How the promotional funds will be paid out;
 - 4. How/when the contributed funds are added to the pools; and
 - 5. Amount/percentage of funds allocated to primary and secondary pools, if applicable.
- F. Promotional pool contributions must not be placed in or near the rake circle, in the drop box, or commingled with gaming revenue from card games or any other gambling game.
- G. The amount of the jackpot shall be conspicuously displayed in the card room.
- H. At least once a day, the posted pool amount must be updated to reflect the current pool amount.
- I. At least once a day, personnel independent of the card room must reconcile increases to the posted pool amount to the cash previously counted or received by the cage.
- J. All decreases to the pool must be properly documented, including a reason for the decrease.
- K. Promotional funds removed from the card game must be placed in a locked container.
 - 1. Personnel authorized to transport the locked container are precluded from having access to the contents keys.

2. The contents key must be maintained by a department independent of the card room.
 3. At least once a day, the locked container must be removed by two agents, one of whom is independent of the card games department, and transported directly to the cage or other secure room to be counted, recorded, and verified, prior to accepting the funds into cage accountability.
- L. Signatures of at least three (3) employees, one of which is independent of the Table Games Department, will be required for jackpot/progressive payouts in excess of \$5,000. The TGRA shall be notified for jackpots in excess of \$5,000, and present prior to payouts of \$10,000 or more.

XV. Player Tracking:

- A. 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.
- B. All other changes to the player tracking system must be appropriately documented.
- C. 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.

XVI. Revenue Audit:

- A. Audits must be performed by agent(s) independent of the transactions being audited.
- B. The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.
- C. Daily, reconcile the amount indicated on the progressive sign/meter to the cash counted or received by the cage and the payouts made for each promotional progressive pot and pool.
 1. The reconciliation must be sufficiently documented, including substantiation of differences and adjustments.
- D. At the conclusion of each contest/tournament, reconcile all contest/tournament entry and payout forms to the dollar amounts recorded in the appropriate accountability document.
- E. For gaming promotions and player tracking:
 1. At least monthly, review promotional payments, drawings, and giveaway programs to verify payout accuracy and proper accounting treatment in accordance with the rules provided to patrons.
 2. At least monthly, for computerized player tracking systems, perform the following procedures:
 - a. Review authorization documentation for all manual point additions/deletions for propriety;
 - b. Review exception reports, including transfers between accounts; and
 - c. Review documentation related to access to inactive and closed accounts.
 3. At least annually, all computerized player tracking systems must be reviewed by agent(s) independent of the individuals that set up or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization document and maintain the test results.
- F. 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.
- G. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

XVII. Dispute Resolution:

- A. If the gaming operation or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming operation and the patron are unable to resolve the dispute, and the dispute involves:
 - 1. Less than \$500.00; The gaming operation shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 - 2. At least \$500.00; The gaming operation shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming operation fails to provide a timely notice of dispute to the TGRA, the gaming operation shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 4:

Minimum Internal Control Standards for Pull Tabs

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- A. For any computer application utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards of this section, as approved by the TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen to ensure the legitimacy of the currency.

IV. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the paper room are required to complete the paper room access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- C. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in IV.B above shall not apply.
- D. In the event of a magnetic door system failure, the standard in IV.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

V. Personnel Standards:

- A. The Bingo Department shall strive to ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of employee; and

6. Signature of trainer/supervisor acknowledging the employees competence in the area(s) trained.
- B. Supervision must be provided as needed for pull tab operations and over pull tab storage areas by an agent(s) with authority equal to or greater than those being supervised.

VI. Pull Tab Inventory:

- A. Controls must be established and procedures implemented to ensure that:
1. Access to pull tabs is restricted to authorized agents;
 2. The pull tab inventory is controlled by agents independent of pull tab sales;
 3. Pull tabs exchanged between agents are secured and independently controlled;
 4. Increases or decreases to pull tab inventory are recorded, tracked, and reconciled; and
 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.

VII. Pull Tab Sales:

- A. Controls must be established and procedures implemented to record, track, and reconcile all pull tab sales and voids.
- B. When pull tab sales are recorded manually, total sales must be verified by an agent independent of the pull tab sales being verified.
- C. No person may have unrestricted access to pull tab sales records.

VIII. Winning Pull Tabs:

- A. Controls must be established and procedures implemented to record, track, and reconcile all redeemed pull tabs and pull tab payouts.
- B. Redeemed pull tabs must be defaced so that they cannot be redeemed for payment again.
- C. 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.
- D. 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.
1. An automated method may substitute for one verification.
 2. The predetermined threshold must be authorized by management, approved by the TGRA, documented, and maintained.
- E. Total payout must be calculated and recorded by shift.

IX. Pull Tab Operating Funds:

- A. 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.
- B. 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.

X. Promotions and Player Tracking:

- A. 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:
1. The rules of play;
 2. The nature and value of the associated prize(s) or cash award(s);
 3. Any restrictions or limitations on participant eligibility;
 4. The date(s), time(s), and location(s) for the associated promotional activity or activities;
 5. Any other restrictions or limitations, including any related to the claim of prizes or cash awards;
 6. The announcement date(s), time(s), and location(s) for the winning entry or entries; and
 7. Rules governing promotions offered across multiple gaming operations, third party sponsored promotions, and joint promotions involving third parties.

- B. 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.
- C. All other changes to the player tracking system must be appropriately documented.
- D. 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.

XI. Statistical Records:

- A. 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.
- B. 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.
 - 1. Investigations must be documented, maintained for inspection, and provided to the TGRA upon request.

XII. Revenue Audit:

- A. Audits must be performed by agent(s) independent of the transactions being audited.
- B. The performance of revenue audit procedures, the exceptions noted, and the follow-up of all revenue audit exceptions must be documented and maintained.
- C. Daily, verify the total amount of winning pull tabs redeemed each day.
- D. At the end of each month, verify the accuracy of the ending balance in the pull tab control log by reconciling the pull tabs on hand and investigate and document any variance noted.
- E. At least monthly, compare for reasonableness the amount of pull tabs sold from the pull tab control log to the amount of pull-tab sales.
- F. At least monthly, review statistical reports for any deviations exceeding a specified threshold, as defined by the TGRA and investigate and document any large and unusual fluctuations noted.
- G. 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.
- H. For gaming promotions and player tracking:
 - 1. At least monthly, review promotional payments, drawings, and giveaway programs to verify payout accuracy and proper accounting treatment in accordance with the rules provided to patrons.
 - 2. At least monthly, for computerized player tracking systems, perform the following procedures:
 - a. Review authorization documentation for all manual point additions/deletions for propriety;
 - b. Review exception reports, including transfers between accounts; and
 - c. Review documentation related to access to inactive and closed accounts.
 - 3. At least annually, all computerized player tracking systems must be reviewed by agent(s) independent of the individuals that set up or make changes to the system parameters. The review must be performed to determine that the configuration parameters are accurate and have not been altered without appropriate management authorization Document and maintain the test results.
- I. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

XIII. Dispute Resolution:

- A. If the gaming operation or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming operation and the patron are unable to resolve the dispute, and the dispute involves:

1. Less than \$500.00; The gaming operation shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 2. At least \$500.00; The gaming operation shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming operation fails to provide a timely notice of dispute to the TGRA, the gaming operation shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 5:

Tribal Internal Control Standards for Table Games

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- A. For any computer application utilized, alternate documentation and/or procedures that provide at least the level of control described by the standards of this section, as approved by the TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen or alternative technology approved by TGRA to ensure the legitimacy of the currency.
- B. Except as specifically permitted by the TGRA, no Person shall possess with the intent to use, or actually use, at any table game, either by himself or in concert with others, any calculator, computer, communications device, other electronic, electrical, or mechanical device, or written material to assist in projecting an outcome at any table game or in keeping track of or analyzing the cards having been dealt, the changing probabilities of any table game, or the playing strategies to be utilized in any table game.1.1.
 - 1. For Roulette, if permitted by the gaming operation rules in force at a given table, players of roulette and its variations may record manually on paper the results of previous spins. No electronic device of any kind may be used in conjunction with the paper record created.

IV. Sensitive Area Access:

- A. All agents who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the card & dice room are required to complete the card & dice access room log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- C. For doors with magnetic locks, the standard in IV.B above shall not apply if authorized agents are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log agents entering and exiting.
- D. In the event of a magnetic door system failure, the standard in IV.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

V. Personnel Standards:

- A. The Table Games Department shall ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of agent; and
 - 6. Signature of trainer/supervisor confirming the employee's competence in the area(s) trained.
- B. No dealer who has been promoted to a supervisor or a dual-rate supervisor shall function in that capacity until he/she has received and passed documented Title 31 training.

VI. Extraneous Items Standards:

- A. The TGRA or the gaming enterprise, as approved by the TGRA, shall establish, and the gaming enterprise shall comply with procedures to address the transporting of extraneous items, such as coats, purses and/or boxes, into and out of the pit.

VII. Supervision:

- A. Supervision must be provided during table game operations by an agent(s) with authority equal to or greater than those being supervised.
- B. A dealer may function as a supervisor if not dealing a game.
- C. A boxperson may not supervise any other area of the pit while supervising activity at the craps table.

VIII. Standards for Drop and Count:

- A. The procedures for the collection of the table game drop and the count thereof shall comply with Section 10, for drop, Section 11 for Count.

IX Minimum and Maximum Wagers:

- A. Except as otherwise specifically provided in this section, the minimum and maximum wagers permitted at any authorized table game in a gaming facility shall be established by the gaming enterprise; provided, however, that any required minimum wager of \$100.00 or less which has corresponding payout odds of five to one or less shall be required to have a maximum wager which is at least ten times the amount of the minimum wager.
- B. A gaming enterprise may offer:
 - 1. Different maximum wagers at one gaming table for each permissible wager in an authorized game; and
 - 2. Different maximum wagers at different gaming tables for each permissible wager in an authorized game.
- C. A gaming enterprise shall provide notice of the minimum and maximum wagers in effect at each gaming table, and any changes thereto, in accordance with Part X.
- D. Dealers shall not accept any wager in excess of the established maximum permitted wager. However, any wager accepted by a dealer which is in excess of the established maximum permitted wager at that gaming table shall be paid or lost in its entirety in accordance with the rules of the game, notwithstanding that the wager exceeded the current table maximum.

X. Rules of the Game and Notice Standards:

- A. The Table Games Department is required to provide notice of the rules pursuant to which a particular table game will be operated, and shall post a sign at the gaming table summarizing the rules, that include the payout odds, in effect at that table.
- B. Except as provided in paragraph (C) below as to changes in permissible minimum and maximum wagers, the Table Games Department shall not change the rules pursuant to which a particular table game is

being operated unless, at least one-half hour in advance of such change, the Table Games Department shall:

1. Post a sign at the gaming table advising patrons of the rule change and the time that it will go into effect;
 2. Announce the rule change to patrons who are at the table; and
 3. Notify the TGRA of the rule change, the gaming table where it will be implemented and the time that it will become effective.
- C. Notwithstanding paragraph (B) above, Table Games Department may at any time change the permissible minimum or maximum wager at a table game, without notifying the TGRA of the change, upon posting a sign at the gaming table advising patrons of the new permissible minimum or maximum wager and announcing the change to patrons who are at the table.
- D. The location, size and a template of the language of each sign required by this Part shall be submitted to and approved by the TGRA prior to its use.

XI. Patron Access to the Rules of the Games and Gaming Guide Standards:

- A. Each Gaming Facility shall maintain at its security podium, a printed copy of the complete text of the rules, including payout odds, of all authorized games and all other information required to be made available to the public for inspection upon request.
- B. Each Gaming Facility shall make available to patrons upon request an abridged version of the information required to be made available. Each such version, known as a "gaming guide", may be produced in a printed, video or other format approved by the TGRA
- C. No gaming guide shall be issued, displayed or distributed by a Gaming Facility unless and until a sample thereof has been submitted to and approved by the TGRA. No Gaming Facility shall issue, display or distribute any gaming guide that is materially different from the approved sample thereof.
- D. Prior to issuing, distributing or displaying a gaming guide that is materially different from the approved sample thereof, each Gaming Facility shall submit and obtain TGRA approval for a sample of the complete guide which contains the material changes.
- E. Each Gaming Facility may display an approved gaming guide at any location in its establishment.
- F. The Gaming Facility must post the following rules for players:
1. A patron must be of appropriate age as set forth in LGCB Regulation, Part 1116;
 2. No side bets are permitted; and
 3. No credit is extended unless credit is authorized by and extended in compliance with LGCB Regulation Part 1126 and the current Compact.

XII. Fill and Credit Standards:

- A. Fill slips and credit slips shall be in at least triplicate form, and in a continuous, prenumbered series. Such slips shall be consecutively numbered and only in one series at a time. Letters of the alphabet shall be used to differentiate series if a numerical series is repeated during the business year.
- B. 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.
- C. 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 security shall sign both the original and first copy, and shall submit them to the accounting department for retention and accountability.
- D. Fill transactions shall be authorized by a pit supervisor 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.
- E. At least three parts of each fill slip shall be utilized as follows:
1. One part shall be transported to the pit with the fill and, after the appropriate signatures are obtained, deposited in the table game drop box;
 2. One part shall be retained in the cage for reconciliation of the cashier bank; and
 3. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.

- F. The part of the fill slip that is placed in the table games drop box shall be of a different color for fills than for credits, unless the type of transaction is clearly and easily distinguishable in another manner. The checking of a box on the form shall not be a clearly distinguishable indicator.
- G. The table number, shift, and amount of fill by denomination and in total shall be noted on all copies of the fill slip. The correct date and time shall be indicated on at least two copies.
- H. All fills shall be transported from the cashier's cage by security.
- I. If more than one fill/credit is processed at the same time, the chips for each fill/credit must be transported in separate birdcages.
- J. The fill slip shall be signed by at least the following individuals (to confirm that each has counted the amount of the fill and the amount agrees with the fill slip):
 - 1. Cashier who prepared the fill slip and issued the chips, tokens, or cash equivalent;
 - 2. Security who transported the chips, tokens, or cash equivalents from the cage to the pit;
 - 3. Dealer or boxperson who received the chips, tokens, or cash equivalents at the gaming table; and
 - 4. Pit supervisor who supervised the fill transaction.
- K. Fills shall be broken down and verified by the dealer or boxperson, in public view and in a place visible to surveillance, before the dealer or boxperson places the fill in the table tray.
- L. The dealer shall then deposit a copy of the fill slip into the drop box on the table, where it shall appear in the soft count room with the cash receipts for the shift.
- M. Credit transactions shall be authorized by a pit supervisor before the issuance of credit slips and transfer of chips, tokens, or other cash equivalent. The credit request shall be communicated to the cage where the credit slip is prepared.
- N. At least three parts of each credit slip shall be utilized as follows:
 - 1. Two parts of the credit slip shall be transported by security to the pit. After the appropriate signatures are obtained, one copy shall be deposited in the table game drop box and the original shall accompany transport of the chips, tokens, or cash equivalents from the pit to the cage for verification and signature of the cashier.
 - 2. For computer systems, one part shall be retained in a secure manner to ensure that only authorized persons may gain access to it. For manual systems, one part shall be retained in a secure manner in a continuous unbroken form.
- O. The table number, shift, and the amount of credit by denomination and in total shall be noted on all copies of the credit slip. The correct date and time shall be indicated on at least two copies.
- P. Chips, tokens, and/or cash equivalents shall be removed from the table tray by the dealer or boxperson, and shall be broken down and verified by the dealer or boxperson, in public view and in a place visible to surveillance, prior to placing them in racks for transfer to the cage.
- Q. All chips, tokens, and cash equivalents removed from the tables shall be transported to the cashier's cage by security.
- R. The credit slip shall be signed by at least the following individuals to confirm that each has counted the items transferred:
 - 1. Cashier who received the items transferred from the pit and prepared the credit slip;
 - 2. Security who transported the items transferred from the pit to the cage and returned to the pit with the credit slip;
 - 3. Dealer or boxperson who had custody of the items prior to transfer to the cage; and
 - 4. Pit supervisor who supervised the credit transaction.
- S. The dealer shall insert the credit slip in the drop box.
- T. Chips, tokens, or other cash equivalents shall be deposited on or removed from gaming tables only when accompanied by the appropriate fill/credit transfer forms.
- U. Cross-fills (the transfer of chips between table games) and cash exchanges are prohibited in the pit.

XIII. Table Inventory Forms:

- A. At the close of each shift, or at any time during the shift, for those table banks that were opened:
 - 1. The table's chip, token, and coin inventory shall be counted and recorded on a table inventory form; or
 - 2. If the table banks are maintained on an imprest basis, a final fill or credit shall be made to bring the bank back to par.
- B. If final fills are not made, beginning and ending inventories shall be recorded on the master game sheet for shift win calculation purposes.

- C. The outgoing pit supervisor and a dealer shall verify the accuracy of inventory forms prepared at shift end. Alternatively, if either the outgoing pit supervisor or a dealer is not available, another gaming department may provide such verification. Verifications shall be evidenced by signature on the inventory form.
- D. If inventory forms are placed in the drop box, someone other than a pit supervisor shall perform such action

XIV. Table Games Computer-Generated Documentation Standards:

- A. Any computer system shall be capable of generating adequate documentation of all information recorded on the source documents and transaction detail (e.g., fill/credit slips, etc.)
- B. Access to this documentation shall be restricted to authorized personnel.
- C. The documentation shall include, at a minimum:
 - 1. System exception information (e.g., appropriate system parameter information, corrections, voids, etc.); and
 - 2. Personnel access listing, which includes, at a minimum:
 - a. Agent name;
 - b. Agent identification number (if applicable); and
 - c. List of functions each agent can perform or equivalent means of identifying same.

XV. Standards for Playing Cards and Dice:

- A. Playing cards and dice shall be maintained in a secure location to prevent unauthorized access and to reduce the possibility of tampering.
- B. Used cards and dice shall be maintained in a secure location until marked, scored, or destroyed, in a manner subject to the approval of the TGRA, to prevent unauthorized access and reduce the possibility of tampering.
- C. The TGRA or the gaming enterprise, subject to the approval of the TGRA, shall establish a reasonable time period, which shall not exceed seven (7) days of use, within which to mark and remove cards and dice from play, except for plastic cards subject to Section XVII.
- D. This standard shall not apply where playing cards or dice are retained for an investigation.
- E. 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 from the gaming enterprise. TGRA-approved inventory forms shall be used for this process.

XVI. Chips and Token Standards:

- A. Chips and tokens are solely representative of value which evidence a debt owed to patrons by the gaming enterprise that issued them and are not the property of anyone other than the gaming enterprise.
- B. A gaming enterprise that utilizes chips and tokens at its Gaming Facility shall:
 - 1. Issue chips or tokens to patrons of its Gaming Facility;
 - 2. Promptly redeem its own chips and tokens from its patrons by cash or check drawn on an account of the gaming enterprise; and;
 - 3. Post conspicuous signs at its establishment notifying patrons that the use of the gaming enterprise's chips or tokens outside the establishment for any monetary purpose whatever is prohibited, and that the chips or tokens issued by the gaming enterprise are the sole property of the gaming enterprise.
 - 4. Promotional chips and tokens may be used for promotions and tournaments as long as each chip and token (with a numerical figure) conspicuously bears the inscription "No Cash Value".
- C. A gaming enterprise that permanently removes from use or replaces chips or tokens at a Gaming Facility, or closes a Gaming Facility, shall redeem chips or tokens within a period of time established by the gaming enterprise and approved by the TGRA
- D. The destruction of chips and tokens must be witnessed by representative of management, TGRA, security and accounting departments and the documentation thereof maintained for three (3) years.

XVII. Plastic Cards

- A. If the gaming enterprise uses plastic cards for card games other than blackjack (not plastic-coated cards), the cards may be used up to three (3) months if the plastic cards are routinely inspected and washed or cleaned in a manner and time frame approved by the TGRA.

XVIII. Analysis of Table Game Performance Standards:

- A. Records shall be maintained by day and shift indicating any single-deck blackjack games that were dealt for an entire shift.
- B. 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.
- C. This information shall be presented to and reviewed by management independent of the Table Games Department on at least a monthly basis.
- D. Management independent of the Table Games Department shall investigate any unusual fluctuations in hold percentage with pit supervisory personnel.
- E. The results of such investigations shall be documented, maintained, and provided to the TGRA upon request.

XIX. Jackpot/Progressive Payout Standards:

- A. Signatures of at least three (3) agents, one of which is independent of the Table Games Department, will be required for jackpot/progressive payouts in excess of \$5,000. The TGRA shall be notified for jackpots in excess of \$5,000, and present prior to payouts of \$10,000 or more.

XX. Accounting/Auditing Standards:

- A. Personnel who are independent of the transactions being audited/accounted for shall perform the accounting and auditing procedures.
- B. 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.
- C. Accounting/auditing agents shall review exception reports for all computerized table games systems at least monthly for propriety of transactions and unusual occurrences.
- D. All noted improper transactions or unusual occurrences shall be investigated with the results documented.
- E. Evidence of the table games auditing procedures and any follow-up performed shall be documented, maintained, and be provided to the TGRA upon request.
- F. A daily recap shall be prepared for the day and month-to-date which shall include the following information:
 - 1. Drop;
 - 2. Win; and
 - 3. Gross revenue.
- G. Accounting/auditing agents shall notify the TGRA promptly of all variances of \$250.00 or more.

XXI. Activities Which Constitute Fraud

- A. Fraudulent acts shall not be permitted by agents or patrons of the gaming enterprise. "Fraudulent acts" shall include but shall not be limited to: misrepresentation of the probabilities of pay out or pay out awards on any gaming device or game; wording pay off schedules or pay out awards in a misleading or deceptive manner; and the failure of an agent to make payment in strict accordance with posted payoff schedules.
- B. Players of any game shall not play, nor attempt to play, in cooperation or collusion with any other Person, nor shall any a player or agent knowingly permit such cooperation or collusion. Evidence of collusion may include, but shall not be limited to, the following:
 - 1. Any play by a player which is intended to assist one player over another.
 - 2. A continuing or repeated pattern of betting by and between the same two or more players, the purpose of which is to cause other players to fold or withdraw from a game.

3. Two or more players sharing winnings from a hand or a player agreeing to share winnings with another player if either wins any part of the pot, except as permitted in tournament play authorized by the TGRA.
 4. Having an agreement not to bet or not to raise another player.
 5. Verbal or nonverbal communication pertaining to the game between persons including, but not limited to: imparting information about one's hand to another player in the pot; advising someone on how to play a hand or suggesting a particular betting action; reading a hand for a player who has not yet shown his hand; or any communication between players by means other than spoken English, unless such communication, or its import, is understood by all persons at the table.
 6. Any other act by two or more players which fraudulently creates an unfair advantage for a player, or which fraudulently creates a disadvantage for any other player in the game.
- C. A gaming enterprise may adopt reasonable procedures to the provisions of this section, subject to TGRA approval, for persons with disabilities.

XXII. Dispute Resolution:

- A. If the gaming operation or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming operation and the patron are unable to resolve the dispute, and the dispute involves:
1. Less than \$500.00; The gaming operation shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 2. At least \$500.00; The gaming operation shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming operation fails to provide a timely notice of dispute to the TGRA, the gaming operation shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 6:

Tribal Internal Control Standards for Gaming Machines

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Application Standards:

- A. For any computer applications utilized, alternate documentation and/or procedures that both provide at least the level of control described by the standards of this section and are approved by the TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen or alternative technology approved by TGRA to ensure the legitimacy of the currency.

IV. Sensitive Area Access:

- A. All agents who are authorized to enter any restricted area must use their access control card, if applicable, even if two (2) or more authorized persons are entering at the same time.
- B. All agents entering or exiting other restricted area(s) outside the gaming machine department are required to complete the appropriate access room log.

V. Personnel Standards:

- A. The Gaming Machines Department shall ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of agent; and
 - 6. Signature of trainer/supervisor acknowledging the agent's competence in the area(s) trained.

VI. Gaming Machines Standards:

- A. 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 patron.
- B. Coins shall include tokens.
- C. For all computerized gaming machine systems, a personnel access listing shall be maintained which includes, at a minimum:
 - 1. Agent name;
 - 2. Agent title;
 - 3. Agent identification number; and
 - 4. Listing of functions each agent can perform.
- D. The Gaming Machine Department shall maintain a physical or computer folder of information on each machine that contains:
 - 1. Manufacturer's specifications;
 - 2. Date machine was placed in service;
 - 3. Date machine was temporarily removed from operation;
 - 4. Date machine was placed back in operation;
 - 5. Date machine was permanently removed from operation; and
 - 6. Any change in designation or machine number.
- E. The gaming enterprise shall ensure that each electronic or electromechanical gaming device in use in the Gaming Facilities must pay out a mathematically demonstrable percentage of all amounts wagered, which must not be less than eighty percent (80%).
- F. The gaming enterprise shall prominently post in visible locations within the Gaming Facilities notices stating that the gaming enterprise is in compliance with the requirement stated in paragraph E above along with a comprehensible explanation of the meaning of this requirement.
- G. The gaming enterprise shall develop a procedure, approved by the TGRA, whereby repaired gaming machines cannot be turned back on without notification to the TGRA, requesting that the TGRA verify that the gaming machine is functioning properly.
- H. The gaming enterprise shall develop a procedure, approved by the TGRA, for 5-day written notification to the TGRA, and subject to the approval of the TGRA, for the following:
 - 1. Gaming machine installations;
 - 2. Gaming machine conversions;
 - 3. Gaming machine moves;
 - 4. Gaming machine temporary removal from the gaming floor; and
 - 5. Gaming machine permanent removal from the gaming floor.

VII. Gaming Machine Installation, Repair, and Maintenance Standards:

- A. A gaming machine is not considered to be ready for customer play until the following is completed:
 - 1. Machine is inspected to ensure that it is free of hazards that could cause patron or agent injury;
 - 2. The hopper is filled, if required;
 - 3. The machine is tested;
 - 4. Label indicating that "this machine pays better than 80%" is affixed to the gaming machine so that it can be seen by patrons;
 - 5. A MEAL ticket is inserted;
 - 6. TGRA has verified the following settings for installations, conversions or authorized setting changes; and
 - a. Par percentage(s);
 - b. Denomination(s);
 - c. Jackpot limit;
 - d. Asset number; and
 - e. Bank number.
 - 7. TGRA has affixed certification.
- B. The Gaming Machine Department shall notify the TGRA any time a machine is turned off for any reason other than a reset.
- C. The gaming machine MEAL ticket must be signed each time a gaming machine door is opened unless the activity will require multiple openings and closings within a time frame of five (5) minutes or less. In this instance **ONLY**, one signature is sufficient.

- D. The gaming enterprise shall develop a procedure for performing routine inspection and maintenance of gaming machines that reasonably ensures, at a minimum, that each machine remains free of hazards that could cause patron or agent injury and that required labels are still affixed.
- E. Notifications from Distributors/Manufacturers of gaming machines will be provided by the TGRA, per protocol, to the Director of Risk Management, with copies to the Corporate Director of Slot Operations and to the Slot Technician Supervisor.
- F. The Gaming Machine Department shall develop procedures, approved by the TGRA, to complete the TGRA Distributor/Manufacturer Notification Form, within the specified timeframe.
- G. The Gaming Machine Department must obtain written authorization and notify the TGRA prior to changing any current gaming machine settings.
- H. Before a gaming machine has a RAM clear performed, the following information must be documented and sent to the Revenue Audit Department immediately:
 - 1. Gaming Machine Number;
 - 2. Soft Meter reading;
 - 3. Hard Meter reading;
 - 4. Life to Date Coin-In;
 - 5. Reason for the RAM clear;
 - 6. Printed name of the technician who performed the RAM clear;
 - 7. Signature of technician; and
 - 8. Badge number of the technician.

VIII. Key/CDS Card Control

- A. The gaming enterprise shall establish a procedure for issuance, use, and control of all keys and CDS cards.
- B. In the event an agent loses any key or CDS cards, the TGRA must be notified immediately.

IX. Gaming Machine Surveillance Notification Standards:

- A. Surveillance shall be notified and **shall monitor** any time a machine is to be opened for any of the following activities:
 - 1. Maintenance and/or repair;
 - 2. Hopper fill;
 - 3. Jackpot payout;
 - 4. Short pay; or
 - 5. Settlement of dispute.

X. Drop and Count Standards:

- A. The procedures for the collection of the gaming machine drop and the count thereof shall comply with Section 10 or Section 11.

XI. Jackpot Payouts, Gaming Machine Fills, Short Pays, and Accumulated Credit Payouts Standards:

- A. For jackpot payouts and gaming machine fills, documentation shall be in triplicate and shall include the following information:
 - 1. Date and time;
 - 2. Machine number;
 - 3. Dollar amount of cash payout or gaming machine fill (both alpha and numeric) or description of personal property awarded, including fair market value. Alpha is optional if another unalterable method is used for evidencing the amount of the payout;
 - 4. Game outcome (including reel symbols, card values, suits, etc.) for jackpot payouts. Game outcome is not required if a computerized jackpot/fill system is used;
 - 5. Preprinted or concurrently printed sequential number;
 - 6. Signatory requirements are as follows:
 - a. Two (2) signatures for amounts between \$0.01 and \$1,199.99:
 - i. Cage Cashier; and
 - ii. Slot Attendant or Slot Floor Lead/Supervisor

- b. Three (3) signatures for amounts between \$1,200.00 and \$4,999.99:
 - i. Cage Cashier;
 - ii. Slot Attendant or Slot Floor Lead/Supervisor; and
 - iii. Security Officer.
 - c. Four (4) signatures for amounts between \$5,000.00 and \$9,999.99, with notification to the TGRA:
 - i. Cage Cashier;
 - ii. Slot Attendant or Security Officer;
 - iii. Security Supervisor; and
 - iv. Slot Floor Lead/Supervisor.
 - d. Five (5) signatures for amounts \$10,000.00 and above, with notification to the TGRA:
 - i. Cage Cashier;
 - ii. Slot Attendant or Security Officer;
 - iii. Security Supervisor;
 - iv. Slot Floor Lead/Supervisor; and
 - v. Casino Shift Manager or Cage Supervisor.
 - 7. Jackpot overrides require the signature of a Slot Floor Lead/Supervisor on the payout form and surveillance shall be notified prior to payout.
 - 8. On graveyard shifts (eight hour maximum), payouts/fills less than \$100 can be made without the payout/fill being witnessed, if surveillance has been notified prior to the payout/fill.
 - 9. When a secondary or primary jackpot is won on a wide area progressive machine, the machine will be secured to prevent access until a representative of the gaming machine company arrives to verify the jackpot and pay the customer. The TGRA must be notified timely.
 - 10. The gaming enterprise shall develop procedures to control jackpot payouts over a predetermined amount which shall require the additional signature and verification of a supervisory or management agent independent of the Gaming Machine Department. Management, subject to approval of the TGRA, shall authorize, document, and implement this predetermined amount.
 - B. Jackpots of \$100,000 and above require the gaming machine's game media (i.e. EPROM, Flash Card, Software Media, Game Board, Game Chip, etc.) be verified by the TGRA in the presence of security and/or the WAP representative, if applicable.
 - C. For short pays and payouts required for accumulated credits, the payout form includes:
 - 1. Date and time;
 - 2. Machine number;
 - 3. Dollar amount of payout (both alpha and numeric); and
 - 4. Signature of at least one (1) agent verifying and witnessing the payout.
 - a. If the payout is \$50 or more, signatures of (2) agents verifying and witnessing the payout.
 - b. If an on-line accounting system is utilized and the payout amount is less than \$3,000, the signature of one (1) agent is sufficient.
 - D. Computerized jackpot/fill systems shall be restricted so as to prevent unauthorized access and fraudulent payouts by one individual, as required by Section 8.III.A.
 - E. Payout forms shall be controlled and routed in a manner that precludes any one individual from producing a fraudulent payout by forging signatures or by altering the amount paid out subsequent to the payout and misappropriating the funds.

XII. Promotional Payouts or Awards:

- A. The gaming enterprise will submit proposals for promotional payouts or awards to the TGRA at least seven (7) days prior to the projected date of implementation. The TGRA will review, return for necessary changes, and approve prior to the implementation of any such promotional payouts or awards.
- B. If a gaming enterprise offers promotional payouts or awards that are not reflected on the gaming machine pay table, then the payout form/documentation shall include:
 - 1. Date and time;
 - 2. Machine number and denomination;
 - 3. Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc., including fair market value);
 - 4. Type of promotion (e.g., double jackpots, four-of-a-kind bonus, etc.); and
 - 5. Signature of at least two (2) agents authorizing and completing the transaction.

XIII. Gaming Machine Department Funds Standards:

- A. The gaming machine booths and change banks that are active during the shift shall be counted down and reconciled each shift by two (2) agents utilizing appropriate accountability documentation.
- B. Unverified transfers of cash and/or cash equivalents are prohibited.
- C. Each bank shall be at imprest balance at the beginning of each shift.
- D. Prior to change bank countdown, surveillance shall be notified to provide camera coverage, and the count shall not begin until surveillance has responded that a camera is in place for observation.
- E. A change attendant shall count down each bank, which shall be balanced by denomination to the inventory form in the bank from the previous shift.
- F. The TGRA shall be notified of all variances.
 - 1. For variances between \$20.01 and \$250.00, the TGRA shall be notified by forwarding a copy of the inventory form to the TGRA office or to the compliance investigator on duty, no later than the close of the gaming day.
 - 2. For variances greater than \$250.00, the TGRA shall be contacted immediately, following the standard procedure for notification.

XIV. EPROM/Flashcard/Other Equivalent Game Software Control Standards:

- A. At least annually, personnel independent of the gaming enterprise and the machines being tested shall perform procedures to ensure the integrity of a sample of gaming machine game program EPROM's, flashcards, or other equivalent game software media. The TGRA shall approve the sampling methodology.
- B. The TGRA shall develop and implement procedures for the following:
 - 1. Removal of EPROM's, flashcards, or other equivalent game software media from devices, and the verification of the existence of errors, as applicable;
 - 2. Receipt and destruction of EPROM's, flashcards, or other equivalent game software media; and
 - 3. Securing the EPROM, flashcard, or other equivalent game software media, from unrestricted access.
- C. The TGRA shall retain custody of all CPU keys and the spare drop keys pertaining to gaming machines.
- D. The TGRA shall ensure that no EPROM's or flashcards are installed or removed from the CPU boards unless the technician is wearing wristbands to prevent static discharge and is using a chip puller to prevent damage to the chips.
- E. The master game program number, par percentage, and the pay table shall be verified to the par sheet by the gaming enterprise, when initially received from the manufacturer.
- F. Gaming machines with potential jackpots in excess of \$100,000 shall have the game software circuit boards locked or physically sealed. The lock or seal shall necessitate the presence of a TGRA representative to access the device game program EPROM, flashcard, or other equivalent game software media. If a seal is used to secure the board to the frame of the gaming device, it shall be pre-numbered and affixed by the TGRA.
- G. Records that document the procedures in paragraph B of this section shall be recorded in a database and shall include the following information:
 - 1. Date;
 - 2. Machine number (source and destination);
 - 3. Manufacturer and program number;
 - 4. Personnel involved;
 - 5. Disposition of any permanently removed EPROM, flashcard, or other equivalent game software media;
 - 6. Seal numbers, if applicable; and
 - 7. Approved testing lab approval numbers, if available.
- H. EPROM's, flashcards, and other equivalent game software media shall be labeled with the program number, which is recorded in a TGRA database. The database shall also include the date, program number, information identical to that shown on the manufacturer's label, and initials of the individual sealing the EPROM, flashcard, or other equivalent game software media.
- I. The gaming enterprise must inform gaming machine vendors that the TGRA requires a minimum of 5 days notice prior to receipt of EPROM's, flashcards, or other equivalent software media or gaming machines.
- J. Under no circumstances will there be any duplication of EPROM's, flashcards, or other equivalent software media by the TGRA or the gaming enterprise.

XV. Independent Testing Laboratories Inspection and Certification Standards

- A. Each registered independent testing laboratory shall provide the person seeking inspection and certification with the results of the testing and certification process. The results shall include:
 - 1. A statement that the certification process was conducted in accordance with the requirements of the Nevada Gaming Commission and New Mexico Gaming Control Board in existence at the time of testing and the regulations adopted thereunder, and all technical standards, control standards, control procedures, policies, and industry notices implemented or issued to the best of the registered independent testing laboratory's knowledge and belief;
 - 2. The name of the registered independent testing laboratory that performed the testing;
 - 3. The registration number of the registered independent testing laboratory that performed the testing;
 - 4. The location or locations of the facility or facilities the registered independent testing laboratory used to perform the testing;
 - 5. The internal reference number for the registered independent testing laboratory;
 - 6. The date the product was submitted to the registered independent testing laboratory for regulatory certification;
 - 7. The start and end dates of the product testing performed;
 - 8. An attestation statement that the product source code was reproduced;
 - 9. The part and version number or numbers of the product submitted for certification;
 - 10. The unseeded HMAC-SHA1 signature of all applicable files, or other method;
 - 11. A description of the configuration of the product as tested;
 - 12. A description of the scope of testing performed;
 - 13. Identification of the Nevada approved testing document(s) by name and version number;
 - 14. A description of any issues found during the testing process and the resolution thereof;
 - 15. Identification of any modification that was not identified by the manufacturer;
 - 16. A complete description of the testing that was conducted as part of the certification of the product by Nevada and NM standards mentioned above; and
 - 17. Any additional information regarding the testing of the product that the registered independent testing laboratory considers appropriate.

XVI. Standards for Evaluating Theoretical and Actual Hold Percentages:

- A. Accurate and current theoretical hold worksheets shall be maintained for each gaming machine.
- B. For multi-game/multi-denominational machines, an agent or department independent of the Gaming Machine Department shall:
 - 1. Weekly, record the total coin-in meter;
 - 2. Quarterly, record the coin-in meters for each payable contained in the machine; and
 - 3. 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 payable.
- C. For those gaming operations that are unable to perform the weighted average calculation as required by paragraph (b) of this section, the following procedures shall apply:
 - 1. On at least an annual basis, calculate the actual hold percentage for each gaming machine;
 - 2. On at least an annual basis, adjust the theoretical hold percentage in the gaming machine statistical report for each gaming machine to the last calculated actual hold percentage; and
 - 3. The adjusted theoretical hold percentage shall be within the spread between the minimum and maximum theoretical payback percentages.
- D. 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.
- E. The theoretical hold percentages used in the gaming machine analysis reports should be within the performance standards set by the manufacturer.
- F. 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.
- G. Records shall be maintained for each machine that indicate the date the machine was placed into service, any date the machine was removed from operation, any date the machine was placed back into operation, any changes in machine numbers and designations, and the date the machine was permanently removed from operation.

- H. All of the gaming machines shall contain functioning meters that shall record coin-in or credit-in, or utilize a networked gaming machine monitoring system that captures similar data.
- I. All gaming machines with bill acceptors shall contain functioning billing meters that record the dollar amounts or number of bills accepted by denomination.
- J. Gaming machine in-meter readings shall be recorded at least weekly, immediately prior to or subsequent to a gaming machine drop. On-line 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 days.
- K. The agent who records the in-meter reading shall either be independent of the hard count team or shall be assigned on a rotating basis, unless the in-meter readings are randomly verified quarterly for all gaming machines and bill acceptors by a person other than the regular in-meter reader in accordance with procedures approved by the TGRA.
- L. Upon receipt of the meter reading summary, the accounting department shall review all meter readings for reasonableness, using pre-established parameters.
- M. Prior to final preparation of statistical reports, meter readings that do not appear reasonable shall be reviewed with Gaming Machine Department agents or other appropriate designees, and exceptions documented, so that meters can be repaired or clerical errors in the recording of meter readings can be corrected.
- N. 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 computation for individual machines and a comparison to each machine's theoretical hold percentage previously discussed.
- O. 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 (B) of this section.
- P. 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.
- Q. The statistical reports shall be reviewed by both Gaming Machine Department management and management personnel independent of the Gaming Machine Department on at least a monthly basis.
- R. 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 in a timely manner to the TGRA upon request.
- S. Maintenance of the on-line gaming machine monitoring system data files shall be performed by a department independent of the Gaming Machine Department. Alternatively, maintenance may be performed by gaming machine supervisory agents if sufficient documentation is generated and it is randomly verified on a monthly basis by agents independent of the Gaming Machine Department.
- T. 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.

XVII. Gaming Machine Contents Standards

- A. When machines are temporarily removed from the floor, gaming machine drop and hopper contents shall be protected to preclude the misappropriation of stored funds.
- B. When gaming machines are permanently removed from the floor, the gaming machine drop and hopper contents shall be counted and recorded by at least two agents, with appropriate documentation being routed to the Accounting Department for proper recording and accounting for initial hopper loads.

XVIII. Player Tracking System Standards:

- A. The player tracking system shall be secured so as to prevent unauthorized access (e.g., changing passwords at least quarterly and restricting physical access to computer hardware, etc.).
- B. The addition of points to a member's 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 Machine Departments. Alternatively, Gaming Machine Department supervisory agents may authorize addition of points to members' accounts if: (1) sufficient documentation is generated, and (2) agents independent of the Gaming Machine Department randomly verify an appropriate sample of such additions on a quarterly basis.

- C. Booth agents who redeem points for members shall be allowed to receive lost cards, provided that they are immediately deposited into a secured container for retrieval, at least weekly, by security, who shall destroy them. Documentation of destruction shall include:
 1. Date of destruction;
 2. Number of cards destroyed; and
 3. Signature and badge number of agent who destroyed them.
- D. Supervisory agents independent of the Gaming Machine Department shall make changes to the player tracking system parameters, such as point structures and agent access. Alternatively, gaming machine supervisory agents may make changes to player tracking system parameters if sufficient documentation is generated and it is randomly verified, on a monthly basis, by supervisory agents independent of the Gaming Machine Department.
- E. All other changes to the player tracking system shall be appropriately documented.

XIX. In-house Progressive Gaming Machine Standards:

- A. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed on or near the machines to which the jackpot applies.
- B. At least once each day, each gaming enterprise shall record the amount shown on each progressive jackpot meter at the gaming enterprise's establishments, except for those jackpots that can be paid directly from the machine's hopper.
 1. For Gaming Machines which are completely Ticket-In, Ticket-Out (TITO), the gaming enterprise shall record only the amount shown on each progressive jackpot meter with a base reset value of \$250.00 or more.
- C. Explanations for meter reading decreases shall be maintained with the progressive meter reading sheets, and where the payment of a jackpot is the explanation for a decrease, the gaming enterprise shall record the jackpot payout number on the sheet or have the number reasonably available.
- D. Each gaming enterprise shall record the base amount of each progressive jackpot the gaming enterprise offers.
- E. The TGRA shall approve procedures specific to the transfer of progressive amounts in excess of the base amount to other gaming machines. Such procedures may also include other methods of distribution that accrue to the benefit of the gaming public via an award or prize.

XX. Wide-Area Progressive Machine Standards:

- A. A meter that shows the amount of the progressive jackpot shall be conspicuously displayed on or near the machines to which the jackpot applies.
- B. As applicable to a participating gaming enterprise, the wide area progressive gaming machine system shall be adequately restricted to prevent unauthorized access (e.g., changing passwords at least quarterly, restricting access to EPROMs or other equivalent game software media, and restricting physical access to computer hardware, etc.)
- C. The TGRA shall approve procedures for the wide area progressive system that:
 1. Reconcile meters and jackpot payouts;
 2. Collect/drop gaming machine funds;
 3. Verify jackpot, payment, and billing to gaming operations on pro-rata basis;
 4. System maintenance;
 5. System accuracy; and
 6. System security.
- D. Reports, where applicable, adequately documenting the procedures required in paragraph (C) of this section, shall be generated and maintained.

XXI. Accounting/Auditing Standards:

- A. Agents who are independent of the transactions being reviewed shall perform gaming machine accounting/auditing procedures.
- B. For computerized player tracking systems, an accounting/auditing agent shall perform the following procedures at least one day per month:
 1. Foot all points redeemed documentation and trace to the system-generated totals; and
 2. Review all points-redeemed documentation for propriety.

- C. For on-line gaming machine monitoring systems, procedures shall be performed at least monthly to verify that:
 - 1. The system is transmitting and receiving data from the gaming machines properly; and
 - 2. There is continuing accuracy of the coin-in meter readings as recorded in the gaming machine statistical report.
- D. For weigh scale and currency interface systems, for at least one drop period per month, accounting/auditing agents shall make such comparisons as necessary to the system-generated count as recorded in the gaming machine statistical report, in total. Discrepancies shall be resolved prior to generation/distribution of gaming machine reports.
- E. For each drop period, accounting/auditing personnel shall compare the bill-in meter reading to the total bill acceptor drop amount for the period. Discrepancies should be resolved prior to generation/distribution of on-line gaming machine monitoring system statistical reports.
- F. 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 and maintained for inspection, and provided to the TGRA upon request.
- G. At least weekly, accounting/auditing agents shall compare the bill-in meter reading to the total bill acceptor drop amount for the week. Discrepancies shall be resolved before the generation/distribution of gaming machine statistical reports.
- H. Follow-up shall be performed for any one machine having an unresolved variance between actual currency drop and bill-in meter readings in excess of \$200.00. The follow-up performed and results of the investigation shall be documented and maintained for inspection and a copy provided to the TGRA upon request.
- I. 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.
- J. Accounting/auditing agents shall review exception reports for all computerized gaming machine systems on a daily basis for propriety of transactions and unusual occurrences.
- K. All gaming machine auditing procedures and any follow-up performed shall be documented and maintained for inspection and a copy provided to the TGRA upon request.
- L. A report shall be generated at least monthly listing all jackpot overrides for management review with follow-up documentation maintained by accounting/auditing agents.
- M. Accounting/auditing agents shall notify the TGRA of all variances of \$250.00 or more.

XXII. Cash-Out Ticket Standards for Tiers A, B, & C:

- A. In addition to the applicable auditing and accounting standards in section XX, on a quarterly basis, the gaming enterprise shall foot all jackpot tickets equal to or greater than \$1,200 and trace totals to those produced by the host validation computer system.
- B. The customer may request a cash-out ticket from the gaming machine that reflects all remaining credits. An internal document printer shall print the cash-out ticket at the gaming machine. The cash-out ticket, at a minimum, shall contain the following printed information:
 - 1. Casino name;
 - 2. Machine number;
 - 3. Date and time;
 - 4. Alpha and numeric dollar amount of cash-out;
 - 5. Voucher (cashless ticket) number;
 - 6. Barcode;
 - 7. Type of transaction; and
 - 8. A phrase stating that the voucher will expire 30 days after issuance.
- C. A cash-out ticket shall be valid for 30 days from the time of issue by the gaming device. Tickets may be redeemed for payment or inserted in another gaming machine and wagered, if applicable, during the specified time period. After that period, an unredeemed cash-out ticket will have no cash value. If payment is made on an expired cash-out ticket, an authorized supervisor or management personnel must process an override to the online data system.
- D. The customer shall redeem the cash-out ticket at a cashier's cage. Once the cash-out ticket is presented for redemption, a cashier shall:
 - 1. Scan the bar code via an optical reader or its equivalent; or
 - 2. Input the cash-out ticket validation number into the computer.

- E. The information contained in paragraph D shall be communicated to the host computer. The host computer shall verify the authenticity of the cash-out ticket and communicate directly to the redeemer of the cash-out ticket.
- F. If valid:
 - 1. The redeemer of the cash-out ticket pays the customer the appropriate amount and the cash-out ticket is electronically noted "paid" in the system;
 - 2. After the cash-out ticket is electronically validated, the system prints out a validation receipt, which at a minimum, contain the following printed information:
 - a. Machine number;
 - b. Operator number;
 - c. Validation number;
 - d. Issue date;
 - e. Paid date; and
 - f. Amount.
- G. The redeemed cash-out ticket shall remain in the cashiers' bank for reconciliation purposes. The host validation computer system shall electronically reconcile the cashiers' banks for the redeemed cash-out tickets.
- H. If invalid:
 - 1. The host computer shall notify the cashier that an invalid condition exists (i.e.: serial number cannot be found on file (stale date, forgery, etc.), the cash-out ticket has already been redeemed, or amount of cash-out ticket differs from amount on file);
 - 2. The cashier shall refuse payment to the customer and notify a supervisor of the invalid condition; and
 - 3. The supervisor shall resolve the dispute according to approved policies and procedures.
- I. At the end of the cashier's shift, a Validation Window Close report shall be printed. This information shall be compared to the sum of cash-out tickets paid by the cashier during that cashier's sign-on period, and be used to reconcile cash for the shift. The cashier and a supervisor shall sign the Validation Window Close report.
- J. In the event that the cashier is unable to communicate with the host computer system for any reason, the cash-out ticket may be presented to authorized supervisory or management personnel for payment. Authorized personnel will then scan the voucher at an alternative validation terminal that is located in the general proximity, but not outside of the cage area. The ticket will then be validated in the system and a validation receipt will print out. The receipt is then attached to the cash-out ticket and both are presented to the cashier for payment. All validation terminals shall be secured and password controlled.
- K. If the on-line system temporarily goes down, cashiers may redeem cash-out tickets after recording the following in a log. The ticket shall remain in the cashier's bank for reconciliation purposes:
 - 1. Serial number of the cash-out ticket;
 - 2. Date and time;
 - 3. Dollar amount;
 - 4. Issuing gaming machine number; and
 - 5. Cashier's signature and agent #; and
 - 6. Marking the ticket 'paid'.
- L. Cash-out tickets shall be validated as expeditiously as possible when the on-line data system is restored.
- M. The TGRA or the gaming enterprise, subject to the approval of the TGRA, shall develop and implement procedures to control cash-out ticket paper, which shall include procedures which:
 - 1. Mitigate the risk of counterfeiting of cash-out ticket paper;
 - 2. Adequately control the inventory of the cash-out ticket paper; and
 - 3. Provide for the destruction of all unused cash-out ticket paper.
- N. If the host validation computer system is down for more than one hour, the gaming enterprise shall promptly notify the TGRA.
- O. These gaming machine systems shall comply with all other standards (as applicable) in this part, including:
 - 1. Standards for bill acceptor drop and count;
 - 2. Standards for coin drop and count; and
 - 3. Standards concerning EPROM's or other equivalent game software media.

XXIII. Account Access Card Standards:

- A. The following equipment is necessary to provide account access cards:
 - 1. A central computer, with supporting hardware and software, to coordinate network activities, provide system interface, and store and manage a player/account database;
 - 2. A network of contiguous player terminals with touch-screen or button-controlled video monitors connected to an electronic selection device and the central computer via a communications network; and
 - 3. One or more electronic selection devices, utilizing random number generators, each of which selects any combination or combinations of numbers, colors, and/or symbols for a network of player terminals.
- B. Player terminals:
 - 1. The player terminals are connected to a game server;
 - 2. The game server shall generate and transmit to the bank of player terminals, a set of random numbers, colors, and/or symbols at regular intervals. The subsequent game results are determined at the player terminal and the resulting information is transmitted to the account server; and
 - 3. The game server shall be housed in a game server room or a secure locked cabinet.
- C. Patron account maintenance:
 - 1. A central computer acting as an account server shall provide customer account maintenance and the deposit/withdrawal function of those account balances;
 - 2. Patrons may access their accounts on the computer system by means of an account access card at the player terminal. Each player terminal may be equipped with a card reader and personal identification number (PIN) pad or touch screen array for this purpose; and
 - 3. All communications between the player terminal and the account server shall be encrypted for security reasons.
- D. Patron account generation:
 - 1. A computer file for each patron shall be prepared by a clerk who has with no incompatible functions prior to the patron being issued an account access card to be utilized for machine play. The patron may select his/her PIN to be used in conjunction with the account access card.
 - 2. For each customer file, an agent shall:
 - a. Record the customer's name and current address;
 - b. The date the account was opened; and
 - 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.
 - 3. The clerk shall sign-on with a unique password to a 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.
 - 4. After entering a specified number of incorrect PIN entries at the cage or player terminal, the patron shall be directed to proceed to a clerk to obtain a new PIN. If a patron forgets, misplaces, or requests a change to his/her PIN, the patron shall proceed to a clerk for assistance.
- E. Deposit of credits standard:
 - 1. The cashier shall sign on, with a unique password, to a cashier terminal equipped with peripherals required to complete the credit transactions. Passwords are issued and can only be changed by information technology personnel at the discretion of the department director;
 - 2. The patron shall present cash, chips, coin, or coupons, along with his/her account access card, to a cashier to deposit credits;
 - 3. The cashier shall complete the transaction by utilizing a card scanner, through which the cashier shall slide or otherwise accurately read the patron's account access card;
 - 4. The cashier shall accept the funds from the patron and enter the appropriate amount on the cashier terminal;
 - 5. A multi-part deposit slip shall be generated to the point of sale receipt printer. The cashier shall direct the patron to sign two copies of the deposit slip receipt. The original of the signed deposit slip shall be given to the patron. The first copy of the signed deposit slip shall be secured in the cashier's cash drawer; and
 - 6. The cashier shall verify the patron's balance before completing the transaction. The cashier shall secure the funds in his/her cash drawer and return the account access card to the patron.

- F. Prizes:
 1. A winner at a gaming machine may receive cash, a cash equivalent, a prize redeemable for cash, or merchandise;
 2. If merchandise prizes are to be awarded, the specific type of prize or prizes that may be won shall be disclosed to the player before the game begins; and
 3. The redemption period of account access cards, as approved by the TGRA, shall be conspicuously posted in the Gaming Facility.
- G. Credit withdrawal:
 1. The patron shall present his/her account access card to a cashier to withdraw his/her credits; and
 2. The cashier shall perform the following:
 - a. Scan the account access card;
 - b. Request that the patron enter his/her pin, if the patron selected the PIN.
 - c. The cashier shall ascertain the amount the patron wishes to withdraw and enter the amount into the computer;
 - d. The point of sale receipt printer shall generate a multi-part withdrawal slip. The cashier shall direct the patron to sign the original and one copy of the withdrawal slip;
 - e. The cashier shall verify that the account access card and the patron match by:
 - i. Comparing the patron to the image on the computer screen; or
 - ii. Comparing the patron signature on the withdrawal slip to the signature on the computer screen.
 - f. The cashier shall verify the patron's balance before completing the transaction. The cashier shall pay the patron the appropriate amount, issue the patron the original withdrawal slip, and return the account access card to the patron;
 - g. The first copy of the withdrawal slip shall be placed in the cash drawer. All account transactions shall be accurately tracked by the account server computer system. The first copy of the withdrawal slip shall be forwarded to the accounting department at the end of the gaming day; and
 - h. In the event the imaging function on the computer system is temporarily disabled or otherwise unavailable, patrons shall be required to provide positive ID for cash withdrawal transactions at the cashier stations.

XXIV. Smart Card Standards:

- A. A smart card (i.e., a card that possesses the means to electronically store and retrieve data) shall not be the only source of account data.

XXV. Dispute Resolution:

- A. If the gaming operation or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming operation and the patron are unable to resolve the dispute, and the dispute involves:
 1. Less than \$500.00; The gaming operation shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 2. At least \$500.00; The gaming operation shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming operation fails to provide a timely notice of dispute to the TGRA, the gaming operation shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 7:

Tribal Internal Control Standards for the Cage

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction. Corrected information shall remain legible.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. Protection of Assets:

- A. All bills \$50 dollars and above will be verified by marking with a counterfeit pen to ensure the legitimacy of the currency.
- B. The gaming enterprise shall develop policies and procedures, approved by the TGRA, for the appropriate handling of counterfeit money, bad checks, and fraudulent forms of identification.

IV. Sensitive Area Access:

- A. Controls must be established and procedures implemented to:
 - 1. To restrict physical access to cage agents, designated staff, and other authorized persons; and
 - 2. Limit transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into and out of the cage.
- B. Gaming enterprise mantraps shall be of sufficient size to accommodate any anticipated movement of equipment into or out of the mantrap within each casino operation.
- C. Mantrap doors shall operate in a manner that ensures that the first set of doors are closed and secured before a second set of doors is opened.
- D. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- E. Authorized persons entering or exiting the cage are required to complete the cage access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- F. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in IV.E above shall not apply.
- G. In the event of a magnetic door system failure, the standard in IV.E above shall apply.

- H. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

V. Personnel Standards:

- A. The Cage Department shall strive to ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of employee; and
 - 6. Signature of trainer/supervisor acknowledging the employees competence in the area(s) trained.
- B. Supervision must be provided 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.

VI. Check Cashing Standards:

- A. If checks are cashed at the cage, the controls must provide for security and integrity.
- B. For each check cashing transaction, the agent(s) conducting the transaction must:
 - 1. Verify the patron's identity;
 - 2. Examine the check to ensure it includes the patron's name, current address, and signature;
 - 3. For personal checks, verify the patron's check cashing authority and record the source and results in accordance with management policy; however
 - 4. If a check guarantee service is used to guarantee the transaction and the procedures required by the check guarantee service are followed, then the above requirements do not apply.
- C. When counter checks are issued, the following must be included on the check:
 - 1. The patron's name and signature;
 - 2. The dollar amount of the counter check;
 - 3. Patron's bank name, bank routing, and account numbers;
 - 4. Date of issuance; and
 - 5. Signature of the agent approving the counter check transaction.
- D. Checks that are not deposited in the normal course of business, as established by management, (held checks) are subject to NIGC §543.15 lines of credit standards.
- E. When traveler's checks or other guaranteed drafts, such as cashier's checks, are presented, the cashier shall comply with the examination and documentation procedures as required by the issuer.
- F. If a third party check cashing or guarantee service is used, the examination and documentation procedures required by the service provider apply, unless otherwise provided by tribal law or regulation.
- G. The gaming enterprise shall not cash any paycheck or any type of government assistance check, including Social Security, TANF, pension and other similar checks, for any patron. (2007 State of New Mexico Compact §4.B.9)

VII. ATM Standards:

- A. The gaming enterprise shall require the ATM Vendors to submit a yearly certification, due on the first (1st) day of the year, stating that the ATM(s) do not accept cards issued by the State to TANF recipients for access to TANF benefits, along with a list of Bin Numbers that are currently blocked. (2007 State of New Mexico Compact §4.B.11)

VIII. Cage and Vault Accountability Standards:

- A. All transactions that flow through the cage must be summarized for each work shift of the cage and must be supported by documentation.
- B. Increases and decreases to the total cage inventory must be verified, supported by documentation, and recorded.
 - 1. Documentation must include:
 - a. The date and shift;
 - b. The purpose of the increase/decrease;

- c. The agent(s) completing the transaction; and
 - d. The person or department receiving the cage funds (for decreases only).
- C. 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.
 - 1. These agents must make individual counts to compare for accuracy and maintain individual accountability.
 - 2. All variances must be documented and investigated; and
 - 3. The TGRA shall be notified of any variance of \$250.00 or more.
- D. The gaming enterprise, as approved by the TGRA, shall establish, and the gaming enterprise shall comply with a minimum bankroll formula to ensure the gaming operation maintains cash or cash equivalents (on hand and in the bank, if readily accessible) in an amount sufficient to satisfy obligations to the gaming enterprise's customers as they are incurred. A suggested bankroll formula will be provided by the TGRA upon request.
- E. The cage shall determine the length of time, approved by the TGRA, the unclaimed jackpots will remain on Cage Accountability.

IX. Kiosks:

- A. 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.
- B. 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.
- C. Controls must be established and procedures implemented to ensure that currency cassettes contain the correct denominations and have been properly installed.
- D. 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.
- E. The TGRA or the gaming operation, subject to the approval of the TGRA, must develop and implement physical security controls over the kiosks that include the following:
 - 1. Forced entry;
 - 2. Evidence of any entry; and
 - 3. Protection of circuit boards containing programs.
- F. With regard to cashless systems, the TGRA or the gaming operation, subject to the approval of the TGRA, must develop and implement procedures to ensure that communications between the kiosk and system are secure and functioning.
- G. The following reconciliation reports must be available upon demand for each day, shift, and drop cycle (this is not required if the system does not track the information, but system limitation(s) must be noted):
 - 1. Starting balance dollar amount per financial instrument;
 - 2. Starting balance number of items per financial instrument;
 - 3. Dollar amount per financial instrument issued;
 - 4. Number of items per financial instrument issued;
 - 5. Dollar amount per financial instrument redeemed;
 - 6. Number of items per financial instrument redeemed;
 - 7. Dollar amount per financial instrument increases;
 - 8. Number of items per financial instrument increases;
 - 9. Dollar amount per financial instrument decreases;
 - 10. Number of items per financial instrument decreases;
 - 11. Ending balance dollar amount per financial instrument; and
 - 12. Ending balance number of items per financial instrument.
- H. Controls must be established and procedures implemented to ensure that drop box and currency cassettes are securely removed from kiosks that must include the following:
 - 1. Surveillance shall be notified to monitor and record at the beginning of the kiosk replenishment process.
 - 2. Cage employee shall call security to be present for the entire replenishment process.
 - 3. Cage employee and security shall both sign out sensitive keys to all kiosk machines.
 - 4. Cage employee shall be precluded from having simultaneous access to the bill acceptor canister contents keys and the release keys.

5. The authorized cage employee shall exit the cage with full cassettes for replenishment at which point security will provide escort to all kiosks.
6. The authorized cage employee shall enter the kiosk machine with sensitive keys and:
 - a. Sign the meal ticket;
 - b. Use his/her username and password to print reconciliation report;
 - c. Remove hot drop box and insert cold one;
 - d. Remove diverter box and replace with an empty one. If a currency cassette has a separate section for diverted cash this will not apply;
 - e. Remove currency cassettes and insert full cassettes;
 - f. Empty coin dispensers and replenish coins; and
 - g. Reset the kiosk.
- I. The authorized cage employee shall return to the main bank with pulled cassettes.
- J. Access to stored full kiosk drop box and currency cassettes must be restricted to:
 1. Authorized agents; and
 2. In an emergency, authorize persons for the resolution of a problem.
- K. The kiosk count must be performed in a secure area, such as the cage or count room.
- L. 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.
- M. The kiosk drop box and currency cassettes must be individually emptied and counted to prevent the commingling of funds between kiosks until the count of the kiosk contents has been recorded.
 1. Coupons or other promotional items not included in gross revenue (if any) may be recorded on a supplemental document. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.
 2. Redeemed vouchers and pull tabs (if applicable) collected from the kiosk must be secured and delivered to the appropriate department (cage or accounting) for reconciliation.
- N. Corrections to kiosk drop box and currency cassettes count documentation must be verified by two agents.
- O. The gaming operation, as approved by the TGRA shall establish emergency canister replacement procedures.

X. Promotional Payments, Drawings, and Giveaway Programs:

- A. The following procedures must apply to any payment resulting from a promotional payment, drawing, or giveaway program disbursed by the cage department or any other department. This section does not apply to payouts for card game promotional pots and/or pools.
- B. All payments must be documented to support the cage accountability.
- C. Payments above \$600 (or lesser amount as approved by TGRA) must be documented at the time of the payment, and documentation must include the following:
 1. Date and time;
 2. Dollar amount of payment or description of personal property;
 3. Reason for payment; and
 4. Patron's name and confirmation that identity was verified (drawings only).
 - a. For manual payments, signature(s) of at least two agents verifying, authorizing, and completing the promotional payment with the patron.
 - b. For computerized systems that validate and print the dollar amount of the payment on a computer generated form, only one signature is required.

XI. Chip(s) and Token(s) Standards:

- A. Controls must be established and procedures implemented to ensure accountability of chip and token inventory. Such controls must include, but are not limited to, the following:
 1. Purchase;
 2. Receipt;
 3. Inventory;
 4. Storage; and
 5. Destruction.

XII. Coupon and Voucher Standards:

- A. Any program for the exchange of coupons for chips, tokens, and/or another coupon program shall be approved by the TGRA prior to implementation and if approved, the gaming enterprise shall establish and comply with procedures that account for and control such programs.
- B. Controls must be established and procedures implemented to:
 - 1. Verify the authenticity of each voucher redeemed.
 - 2. If the voucher is valid, verify that the patron is paid the appropriate amount.
 - 3. 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.
 - 4. Retain payment documentation for reconciliation purposes.
 - 5. For manual payment of a voucher of \$500 or more, require a supervisory employee to verify the validity of the voucher prior to payment.
- C. Vouchers paid during a period while the voucher system is temporarily out of operation must be marked "paid" by the cashier.
- D. 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.
- E. Paid vouchers must be maintained in the cashier's accountability for reconciliation purposes.
- F. Unredeemed vouchers can only be voided in the voucher system by supervisory employees and the accounting department will maintain the voided voucher, if available.

XIII. Revenue Audit:

- A. At least monthly, the cage accountability shall be reconciled to the general ledger.
- B. At least monthly, trace the amount of cage deposits to the amounts indicated in the bank statements.
- C. Twice annually, a count must be performed of all funds in all gaming areas (i.e. cages, vaults, and booths, that includes reserve areas, kiosks, cash-out ticket redemption machines, and change machines).
 - 1. Count all chips and tokens by denomination and type.
 - 2. Count individual straps, bags, and imprest banks on a sample basis.
 - 3. Reconcile all amounts counted to the amounts recorded on the corresponding accountability forms to ensure that the proper amounts are recorded.
 - 4. Maintain documentation evidencing the amount counted for each area and the subsequent comparison to the corresponding accountability form.
 - 5. The count must be completed within the same gaming day for all areas.
 - 6. Counts must be observed by an individual independent of the department being counted and is permissible for the individual responsible for the funds to perform the actual count while being observed.
 - 7. Revenue audit may observe the two counts.
- D. At least annually, select a sample of invoices for chips and tokens purchased, and trace the dollar amount from the purchase invoice to the accountability document that indicates the increase to the chip or token inventory to ensure that the proper dollar amount has been recorded.
- E. At each business year end, create and maintain documentation evidencing the amount of the chip/token liability, the change in the liability from the previous year, and explanations for adjustments to the liability account including any adjustments for chip/token float.
- F. At least monthly, review a sample of returned checks to determine that the required information was recorded by cage agent(s) when the check was cashed.
- G. At least monthly, review exception reports for all computerized cage systems for propriety of transactions and unusual occurrences.
 - 1. The review must include, but is not limited to, voided authorizations.
 - 2. All noted improper transactions or unusual occurrences identified must be investigated and the results documented.
- H. Daily, reconcile all parts of forms used to document increases/decreases to the total cage inventory, investigate any variances noted, and document the results of such investigations.
- I. Periodically perform minimum bankroll calculations to ensure that the gaming operation maintains cash in an amount sufficient to satisfy the gaming operation's obligations.
- J. 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.

- K. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 8:

Tribal Internal Control Standards for Information Technology

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the server room are required to complete the server room access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- C. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in II.B above shall not apply.
- D. In the event of a magnetic door system failure, the standard in II.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

III. Supervision:

- A. Controls must identify the supervisory agent in the department or area responsible for ensuring that the department or area is operating in accordance with established policies and procedures.
- B. The supervisory agent must be independent of the operation of Class II or Class III games.
- C. Controls must ensure that duties are adequately segregated and monitored to detect procedural errors and to prevent the concealment of fraud.
- D. Information technology agents having access to gaming systems may not have signatory authority over financial instruments and payout forms and must be independent of and restricted from access to:
 - 1. Financial instruments;
 - 2. Accounting, audit, and ledger entries; and
 - 3. Payout forms.

IV. General Controls for Gaming Hardware and Software:

- A. As used in this section only, a system is any computerized system that is integral to the gaming environment. This includes, but is not limited to, the server and peripherals for all gaming systems, accounting, surveillance, essential phone system, and door access and warning systems.
- B. Controls must be established and procedures implemented to ensure adequate:

1. Control of physical and logical access to the information technology environment, including accounting, voucher, cashless and player tracking systems, among others used in conjunction with gaming;
2. Physical and logical protection of storage media and its contents, including recovery procedures;
3. Access credential control methods;
4. Record keeping and audit processes; and
5. Departmental independence, including, but not limited to, means to restrict agents that have access to information technology from having access to financial instruments.

V. Physical Inventory:

- A. The information technology environment and infrastructure must be maintained in a secured physical location such that access is restricted to authorized agents only.
- B. Access devices to the systems' secured physical location, such as keys, cards, or fobs, must be controlled by an independent agent.
- C. Access to the systems' secured physical location must be restricted to agents in accordance with established policies and procedures, which must include maintaining and updating a record of agents granted access privileges.
- D. Network Communication Equipment must be physically secured from unauthorized access.

VI. Logical Security:

- A. Controls must be established and procedures implemented to protect all systems and to ensure that access to the following is restricted and secured:
 1. Systems' software and application programs;
 2. Data associated with gaming; and
 3. Communications facilities, systems, and information transmissions associated with gaming systems.
- B. Unused services and non-essential ports must be disabled whenever possible.
- C. Procedures must be implemented to ensure that all activity performed on systems is restricted and secured from unauthorized access, and logged.
- D. Communications to and from systems via Network Communication Equipment must be logically secured from unauthorized access.

VII. User Control:

- A. Systems, including application software, must be secured with passwords or other means for authorizing access.
- B. Management personnel or agents independent of the department being controlled must assign and control access to system functions.
- C. Access credentials such as passwords, PINs, or cards must be controlled as follows:
 1. Each user must have his or her own individual access credential;
 2. Access credentials must be changed at an established interval approved by the TGRA; and
 3. 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:
 - a. User's name;
 - b. Date the user was given access and/or password change; and
 - c. Description of the access rights assigned to user.
 4. Lost or compromised access credentials must be deactivated, secured or destroyed within an established time period approved by the TGRA.
 5. Access credentials of terminated users must be deactivated within an established time period approved by the TGRA.
 6. Only authorized agents may have access to inactive or closed accounts of other users, such as player tracking accounts and terminated user accounts.

VIII. Installations and/or Modifications:

- A. Only TGRA authorized or approved systems and modifications may be installed.
- B. Records must be kept of all new installations and/or modifications to gaming systems and must include, at a minimum:
 - 1. The date of the installation or modification;
 - 2. The nature of the installation or change such as new software, server repair, significant configuration modifications;
 - 3. Evidence of verification that the installation or the modifications are approved; and
 - 4. The identity of the agent(s) performing the installation/modification.
- C. Documentation must be maintained, such as manuals and user guides, describing the systems in use and the operation, including hardware.

IX. Remote Access:

- A. For computer systems that can be accessed remotely, the written system of internal controls must specifically address remote access procedures including, at a minimum:
 - 1. Verify the current vendor license status and the individual representative license status with the TGRA.
 - 2. Record the application remotely accessed, authorized user's name and business address and version number, if applicable;
 - 3. The procedures used in establishing and using passwords to allow authorized users to access the computer system through remote access;
 - 4. The agents involved and procedures performed to enable the physical connection to the computer system when the authorized user requires access to the system through remote access; and
 - 5. The agents involved and procedures performed to ensure the remote access connection is disconnected when the remote access is no longer required.
- B. Agents may be granted remote access for system support, provided that each access session is documented and maintained at the place of authorization to include:
 - 1. Name and number of the employee authorizing access;
 - 2. Name or identifier of the authorized agent accessing system;
 - 3. Verification of the agent's authorization;
 - 4. Reason for remote access;
 - 5. Date and time of start of end-user remote access session;
 - 6. Date and time of conclusion of end-user remote access session.
 - 7. Description of work performed in adequate detail to include the old and new version numbers, if applicable of any software that was modified, and details regarding any other changes made to the system.
- C. All remote access must be performed via a secured method.
- D. Remote dial-up **READ-ONLY** access is allowed for the New Mexico Gaming Control Board to review wager and payout data of each machine, per §4.B.13 of the 2007 Tribal-State Class III Gaming Compact.

X. Incident Monitoring and Reporting:

- A. Procedures must be implemented for responding to, monitoring, investigating, resolving, documenting, and reporting security incidents associated with information technology systems.
- B. All security incidents must be responded to within an established time period approved by the TGRA and formally documented.

XI. Data Backups:

- A. Controls must include adequate backup, including, but not limited to, the following:
 - 1. Daily data backup of critical information technology systems;
 - 2. Data backup of critical programs or the ability to reinstall the exact programs as needed;
 - 3. Secured storage of all backup data files and programs, or other adequate protection;
 - 4. Mirrored or redundant data source; and
 - 5. Redundant and/or backup hardware.

- B. Controls must include recovery procedures, including, but not limited to, the following:
 - 1. Data backup restoration;
 - 2. Program restoration; and
 - 3. Redundant or backup hardware restoration.
- C. Recovery procedures must be tested on a sample basis at specified intervals at least annually. Results must be documented.
- D. Backup data files and recovery components must be managed with at least the same level of security and access controls as the system for which they are designed to support.

XII. Software Downloads:

- A. Downloads are an acceptable means of transporting approved content, including, but not limited to software, files, data, and prize schedules.
- B. Communication of sensitive data must be secure from eavesdropping, access, tampering, intrusion or alteration unauthorized by the TGRA. Sensitive data includes, but is not limited to:
 - 1. RNG seeds and outcomes;
 - 2. Encryption keys, where the implementation chosen requires transmission of keys;
 - 3. PINs;
 - 4. Passwords;
 - 5. Financial instrument transactions;
 - 6. Transfers of funds;
 - 7. Player tracking information;
 - 8. Download Packages; and
 - 9. Any information that affects game outcome.
- C. Downloads conducted during operational periods must be performed in a manner that will not affect game play.
- D. Downloads must not affect the integrity of accounting data.
- E. The gaming system must be capable of providing:
 - 1. The time and date of the initiation of the download;
 - 2. The time and date of the completion of the download;
 - 3. The gaming system components to which software was downloaded;
 - 4. The version(s) of download package and any software downloaded. Logging of the unique software signature will satisfy this requirement;
 - 5. The outcome of any software verification following the download (success or failure); and
 - 6. The name and identification number, or other unique identifier, of any individual(s) conducting or scheduling a download.
- F. Downloaded software on a gaming system must be capable of being verified by the gaming system using a software signature verification method that meets the requirements of (G) in this part.
- G. The manufacturer or developer of the Class II gaming system must provide to the testing laboratory and to the TGRA an industry-standard methodology, acceptable to the TGRA, for verifying the Class II gaming system game software. For example, for game software stored on rewritable media, such methodologies include signature algorithms and hashing formulas such as SHA-1.

XIII. Document Storage:

- A. Documents may be scanned or directly stored to an unalterable storage medium under the following conditions:
 - 1. The storage medium shall contain the exact duplicate of the original document.
 - 2. All documents stored on the medium shall be maintained with a detailed index containing the gaming operation department and date, which shall be available upon request by the Commission.
 - 3. Upon request and with adequate notice by the Commission, hardware (terminal, printer, etc.) shall be made available in order to perform auditing procedures.
 - 4. Controls shall exist to ensure the accurate reproduction of records up to and including the printing of stored documents used for auditing purposes.
 - 5. The storage medium shall be retained for a minimum of five (5) years.
 - 6. Original documents must be maintained until the books and records have been audited by an independent certified public accountant.

- B. Any documents not scanned must be retained for a minimum of (5) five years.
 - 1. A variance may be requested for destruction of a document which cannot be easily scanned if the exact information on the document can be retrieved in report format.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 9:

Tribal Internal Control Standards for Complimentary Services or Items

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Supervision:

- A. 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.

III. Complimentary Services or Items:

- A. 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;
 - 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; and
 - 4. Documenting and recording the authorization, issuance, and redemption of complimentary services or items, including cash and non-cash gifts.
 - a. 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:
 - i. Name of patron who received the complimentary service or item;
 - ii. Name(s) and of issuer(s) of the complimentary service or item;
 - iii. The actual cash value of the complimentary service or item;
 - iv. The type of complimentary service or item (i.e., food, beverage); and
 - v. Date the complimentary service or item was issued.

IV. Reporting Standards:

- A. 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 TGRA must be prepared at least monthly.
 - 2. The detailed report must be forwarded to management for review.

V. Revenue Audit:

- A. At least monthly, review the reports required in Part IV of this Section, which must be made available to those entities authorized by the TGRA or by tribal law or ordinance.
- B. 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.
- C. At least monthly, verify receipt, issuance, and use of controlled inventory, including, but not limited to, bingo cards, pull tabs, playing cards, keys, pre-numbered and/or multi-part forms.

VI. Dispute Resolution:

- A. If the gaming operation or management contractor refuses to pay alleged winnings to a patron engaged in any gaming activity and the gaming operation and the patron are unable to resolve the dispute, and the dispute involves:
 - 1. Less than \$500.00; The gaming operation shall inform the patron in writing that the patron has the right, within seven (7) calendar days of the patron's receipt of that notice, to make a written request to the TGRA to conduct an investigation.
 - 2. At least \$500.00; The gaming operation shall notify the TGRA in writing of the dispute no later than 48 hours after it becomes aware of the dispute, and shall provide a copy of that notice to the patron, which shall include an explanation of the patron's right to make a written request for investigation within seven (7) calendar days of that patron's receipt of the notice of dispute.
- B. If the gaming operation fails to provide a timely notice of dispute to the TGRA, the gaming operation shall be subject to regulatory penalty where applicable; further, the patron shall have seven (7) calendar days to make a written request for investigation from the date of actual notice to the patron of the right to make such a request.
- C. A failure by the patron to make a request for investigation to the TGRA within the relevant seven (7) day period shall bar any and all claim to any money or other thing of value in dispute. A request for investigation shall be considered timely if it is postmarked on or before the seventh calendar day after the patron is informed of the right to make a request.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 10:

Tribal Internal Control Standards for Drop

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error, writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, if applicable, even if two (2) or more authorized persons are entering at the same time.

IV. Personnel Standards:

- A. Supervision must be provided for drop and count as needed by an agent(s) with authority equal to or greater than those being supervised.

V. Emergency Drop Procedure Standards:

- A. Emergency drop procedures shall be developed by the gaming enterprise and approved by the TGRA that includes notification to surveillance and the TGRA before the drop is conducted, recording the date, time, and signature of employee signing out/in the release keys.

VI. Mantrap Standards:

- A. Gaming enterprise mantraps shall be of sufficient size to accommodate all drop trolleys to be utilized within each casino operation.
- B. Mantrap doors shall operate in a manner that ensures that the first set of doors closes completely before the second set of doors is opened.

VII. General Drop Standards:

- A. Surveillance must be notified when any drop is to begin so that surveillance may monitor the activities.
- B. The drop shall be performed in a manner that provides protection of both the monetary and equipment assets.
- C. At least three (3) agents must be involved in the removal of locked drop boxes, at least one of whom is from security.
- D. All drop boxes may be removed only at the time previously designated by the gaming operation and reported to the TGRA.
- E. Once the drop process has begun, it must continue until finished. This includes the setting out of empty drop boxes.
- F. Security must be provided for the drop boxes removed from player interfaces and awaiting transport to the count room.

- G. Locked drop boxes must be removed by an agent independent of the gaming department being dropped, then transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
- H. Transportation of drop boxes must be performed by a minimum of two (2) agents, at least one of whom is security.
- I. All drop boxes must be posted with a number corresponding to a permanent number on the player interface to indicate, if applicable, game, table number and shift.
- J. Procedures shall be developed and implemented to ensure that unauthorized access to empty drop boxes shall not occur from the time the boxes leave the storage racks until they are placed on the player interface.
- K. The involvement of at least two (2) agents independent of the cage department shall be required to access stored empty drop boxes.
- L. For Table Games and Card Games:
 - 1. At the end of each shift:
 - a. All locked drop boxes shall be removed from the tables by security;
 - b. A separate drop box shall be placed on each table opened at any time during each shift or a gaming operation may utilize a drop box with separate openings and compartments for each shift; and
 - c. Upon removal from the tables, the drop boxes shall be transported directly to the count room or other equivalently secure area with comparable controls and locked in a secure manner until the count takes place.
 - 2. All tables that were not open during a shift and therefore not part of the drop must be documented.

VIII. General Key Control Standards:

- A. All duplicate keys shall be maintained in a manner that provides the same degree of control as is required for the original keys.
- B. Records shall be maintained for each key duplicated that indicate the number of keys made and destroyed.
- C. Logs shall be maintained by the custodian of sensitive keys to document authorization of personnel accessing keys
- D. Quarterly, an inventory of all controlled keys must be performed and reconciled to records of keys made, issued, and destroyed. Investigations shall be performed for all keys unaccounted for, with the investigation being documented.

IX. Drop Box Storage Rack Key Standards:

- A. An agent independent of the gaming department being dropped shall be required to accompany the drop box storage rack keys and observe each time drop boxes are removed from or placed in storage racks.
- B. Persons authorized to obtain drop box canister storage rack keys shall be precluded from having simultaneous access to drop box canister contents keys, with the exception of the count team.

X. Drop Box Release Key Standards:

- A. Drop box release keys shall be separately keyed from the contents keys.
- B. A department independent of the gaming departments requiring box drops shall maintain the drop box release keys.
- C. Only the agents authorized to remove drop boxes from the player interface shall be allowed access to the release keys; however, the count team members may have access to the release keys during the soft count in order to reset the table games or card games drop boxes.
- D. Agents authorized to remove the drop boxes shall be precluded from having simultaneous access to the drop box contents keys and the release keys.
- E. For situations requiring access to a drop box at a time other than the scheduled drop, the date, time, signature of employee signing out/in the release key, and the reason for access must be documented.

XI. Computerized Key Security System Standards:

- A. Computerized key security systems which restrict access to the drop and count keys through the use of passwords, keys or other means, other than a key custodian, must provide the same degree of control as indicated in the aforementioned key control standards; refer to 10.IX, 10.X and 11.VII. Note: This standard does not apply to the system administrator. The system administrator is defined in paragraph XI.B.1 below.
- B. For computerized key security systems, the following additional key control procedures apply:
 - 1. Management personnel independent of the gaming departments requiring box drops assign and control user access to keys in the computerized key security system (i.e., system administrator) to ensure that drop and count keys are restricted to authorized employees.
 - 2. In the event of an emergency or the key box is inoperable, access to the emergency manual key(s) (a.k.a override key), used to access the box containing drop and count keys, requires the physical involvement of at least three persons from separate departments, including management. 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).
 - 3. The custody of the keys issued pursuant to paragraph XI.B.2 above requires the presence of two persons from separate departments from the time of their 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 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 keys(s).
- C. For computerized key security systems controlling access to drop and count keys, accounting/audit personnel, independent of the system administrator, will perform the following procedures:
 - 1. At least quarterly, 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 transaction completed by the system administrator provide an adequate control over the access to 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.
 - 2. 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.
 - 3. At least quarterly, review a sample of users that are assigned access to drop and count keys to determine that their access to the assigned keys is adequate relative to their job position.
 - 4. All noted improper transaction or unusual occurrences are investigated with the results documented.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 11:

Tribal Internal Control Standards for Count

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to information originally recorded by the count team on soft count documentation shall be made by drawing a single line through the error, writing the correct figure above or below the original figure, and then obtaining the initials of at least two (2) count team members who verified the change. Corrected information shall remain legible.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. Sensitive Area Access:

- A. Controls must be established and procedures implemented to:
 - 1. Restrict physical access to the count room to count team agents, designated staff, and other authorized persons; and
 - 2. Limit transportation of extraneous items such as personal belongings, tool boxes, beverage containers, etc., into or out of the count room.
- B. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- C. Authorized persons entering or exiting the soft count room are required to complete the soft count room access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- D. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in III.B above shall not apply.
- E. In the event of a magnetic door system failure, the standard in III.C above shall apply.
- F. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

IV. Mantrap Standards:

- A. Gaming enterprise mantraps shall be of sufficient size to accommodate all drop trolleys to be utilized within each casino operation.
- B. Mantrap doors shall operate in a manner that ensures that the first set of doors closes completely before the second set of doors is opened.

V. Count Room Standards:

- A. The count room shall be kept clear of supplies and equipment that are not required for the drop box count.
- B. Surveillance shall view the count, live, or on video recording and/or digital record, within seven (7) days of the count.

VI. Count Room Personnel Standards:

- A. Supervision must be provided for the count as needed by agents(s) with authority equal to or greater than those being supervised.
- B. Controls 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 that include:
 - 1. For Tier A and B operations:
 - a. All counts must be performed by at least two (2) agents;
 - b. At no time during the count can there be fewer than two (2) count team agents in the count room until the drop proceeds have been accepted into the cage/vault accountability;
 - c. Count team agents must be rotated on a routine basis such that the count team is not consistently the same two (2) agents more than four days per week. This standard not apply to gaming operations that utilize a count team of more than two (2) agents.
 - 2. For Tier C operations:
 - a. All counts must be performed by at least three (3) agents;
 - b. At no time during the count can there be fewer than three (3) count team agents in the count room until the drop proceeds have been accepted into the cage/vault accountability;
 - c. Count team agents must be rotated on a routine basis such that the count team is not consistently the same three (3) agents more than four days per week. This standard does not apply to gaming operation that utilize a count team of more than three (3) agents.
 - 3. Functions performed by count team agents must be rotated on a routine basis.
 - 4. Count team agents must be independent of the department being counted.
 - a. A cage/vault agent may be used if they are not the sole recorder of the count and do not participate in the transfer of drop proceeds to the cage/vault.
 - b. An accounting agent may be used if there is an independent audit of all count documentation.
- C. Count Room personnel shall not be allowed to exit or enter the count room during the count except for emergencies or scheduled breaks.
- D. Surveillance shall be notified when count room personnel exit or enter the count room during the count.

VII. Drop Box Contents Key Standards:

- A. The physical custody of the keys needed for accessing stored, full drop box contents shall require the involvement of persons from two (2) separate departments, with the exception of the count team.
- B. Access to the drop box contents keys at other than scheduled count times will require the involvement of at least three (3) persons from separate departments, one of whom must be a supervisor. The reason for access shall be documented with the signatures of all participants and observers.
- C. Only count team members shall be allowed access to drop box content keys during the count process.

VIII. Count Standards:

- A. Access to stored full drop boxes must be restricted to:
 - 1. Authorized members of the drop and count teams; and
 - 2. In an emergency, authorized persons for the resolution of a problem.
- B. The count shall be performed in a count room or equivalently secure area with comparable controls.
- C. Access to the count room during the count shall be restricted to members of the count team, with the exception of authorized observers, supervisors for resolution of problems, and authorized maintenance personnel.

- D. If counts from various revenue centers occur simultaneously in the count room, procedures shall be in effect that prevent the commingling of funds from different revenue centers.
- E. The count team must not have access to amount-in or bill-in meter amounts until after the count is completed and the drop proceeds are accepted into the cage/vault accountability.
- F. Count equipment and systems must be tested, with the results documented, at minimum before the count begins to ensure the accuracy of the equipment.
- G. The 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 recorded.
 - 1. For counts that do not utilize a currency counter, a second count must be performed by a member of the count team who did not perform the initial count. Separate counts of chips and tokens must always be performed by members of the count team.
 - 2. Coupons or other promotional items not included in gross revenue must be recorded on a supplemental document by either the count team members or accounting personnel. All single-use coupons must be cancelled daily by an authorized agent to prevent improper recirculation.
 - 3. If a currency counter interface is used:
 - a. It must be restricted to prevent unauthorized access; and
 - b. The currency drop figures must be transferred via direct communications line or computer storage media to the accounting department.
- H. If currency counters are utilized, a count team member shall be able to observe the loading and unloading of all currency at the currency counter, including rejected currency.
- I. Two (2) counts of the currency rejected by the currency counter must be recorded per table or interface terminal, as well as in total. Rejected currency must be posted to the table or player interface from which it was collected. Posting rejected currency to a nonexistent table or player interface is prohibited.
- J. Drop boxes, when empty, shall be shown to another member of the count team, or to another agent who is observing the count, and to surveillance, provided that the count is monitored in its entirety by a person independent of the count.
- K. Fill/credit orders (if applicable) shall be matched to the fill/credit slips. Fills and credits should be traced to or recorded on the count sheet.
- L. The opening/closing table inventory forms (if applicable) shall either be:
 - 1. Examined and traced to or recorded on the count sheet; or
 - 2. If a computerized system is used, accounting personnel can trace the opening/closing table inventory forms to the count sheet. Variances shall be investigated with the findings documented and maintained for inspection.
- M. A count team member, who shall not function as the sole recorder, shall reconcile the count sheet to the total drop and variances must be reconciled and documented.
- N. All members of the count team shall sign the count sheet or a summary report to attest to their participation in the count.
- O. A final verification of the total drop proceeds, before transfer to cage/vault, must be performed by at least two (2) agents, one of whom is a supervisory count team member, and one a count team agent.
 - 1. Final verification must include a comparison of currency counted totals against the currency counter/system report, if any counter/system is used.
 - 2. Any unresolved variances must be documented, and the documentation must remain part of the final count record forwarded to accounting.
 - 3. This verification does not require a complete recount of the drop proceeds, but does require a review sufficient to verify the total drop proceeds being transferred.
 - 4. The two (2) agents must sign the report attesting to the accuracy of the total drop proceeds verified.
 - 5. All drop proceeds and cash equivalents that were counted shall be turned over to the cage or vault agent, who must be independent of the count team, or to an agent independent of the revenue generation source and the count process for verification. The agent shall certify, by signature, the amount of the drop proceeds delivered and received. Any unresolved variances must be reconciled, documented, and/or investigated by accounting /revenue audit.
- P. After verification by the agent receiving the funds, the drop proceeds must be transferred to the cage/vault.
 - 1. The count documentation and records must not be transferred to the cage/vault with the drop proceeds.
 - 2. The cage/vault agent must have no knowledge or record of the drop proceeds total before it is verified.

3. All count records must be forwarded to accounting or secured and accessible only by accounting agents.
 4. The cage/vault agent receiving the transferred drop proceeds must sign the count sheet attesting to the verification of the total received, and thereby assume accountability of the drop proceeds, ending the count.
 5. Any unresolved variances between total drop proceeds recorded on the count sheet and the cage/vault final verification during transfer must be documented and investigated.
- Q. The count sheet, with all supporting documents, must be delivered to the accounting department by a count team member or an agent independent of the cage/vault. Alternatively, it may be adequately secured so that it is only accessible to accounting agents.

IX Variance Standards:

- A. 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.

X. Revenue Audit:

- A. At least quarterly, unannounced currency counter and currency counter interface (if applicable) tests must be performed, and the test results documented and maintained by agent(s) independent of the drop and count.
- B. All denominations of currency and all types of cash out tickets counted by the currency counter must be tested.
- C. The result of these tests must be documented and signed by the agent(s) performing the test.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 12:

Tribal Internal Control Standards for Surveillance

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error, writing the correct information above or below the error, and then initialing the correction.

II. Sensitive Area Access:

- A. All employees who are authorized to enter a restricted area must use their access control card, even if two (2) or more authorized persons are entering or exiting at the same time.
- B. Authorized persons entering or exiting the surveillance room are required to complete the surveillance room access log which will include, but not be limited to:
 - 1. Date;
 - 2. Time In;
 - 3. Printed Name;
 - 4. Signature;
 - 5. Gaming License number;
 - 6. Reason;
 - 7. Escort Name;
 - 8. Escort Gaming License number; and
 - 9. Time Out.
- C. Doors with magnetic locks, where authorized employees are required to use their access control card to enter **and** exit, and if the magnetic swipe system has the capability to log employees entering and exiting, the standard in II.B above shall not apply.
- D. In the event of a magnetic door system failure, the standard in II.B above shall apply.
- E. The manual or electronic logs shall be made available to the TGRA or the Gaming Commission upon request.

III. Personnel Standards:

- A. The surveillance system shall be maintained and operated from a staffed surveillance room and shall provide surveillance over all gaming areas.
- B. The Surveillance Department shall strive to ensure that documented training of staff is completed that will include, but is not limited to:
 - 1. Equipment;
 - 2. Each game;
 - 3. House Rules;
 - 4. Policies & Procedures;
 - 5. Signature of employee; and
 - 6. Signature of trainer/supervisor acknowledging the employees competence in the area(s) trained.
- C. Supervision must be provided as needed for surveillance by an agent(s) with authority equal to or greater than those being supervised.

IV. Surveillance Equipment and Control Room Standards:

- A. Controls must be established and procedures implemented that include the following:
 - 1. For Tier A, the surveillance system must be maintained and operated from a secured location, such as a locked cabinet.
 - 2. For Tiers B and C, the surveillance system must be maintained and operated from a staffed surveillance operation room(s).
- B. The entrance to the surveillance room shall be located so that it is not readily accessible by either gaming enterprise employees who work primarily on the casino floor, or the general public.
- C. The surveillance operation room(s) must be secured to prevent unauthorized entry.
- D. Access to the surveillance operation room(s) must be limited to surveillance agents and other authorized persons.
- E. Surveillance operation room(s) access logs must be maintained in accordance to part II of this section.
- F. Surveillance operation room equipment must have total override capability over all other satellite surveillance equipment.
- G. Power loss to the surveillance system:
 - 1. For Tier A, in the event of power loss to the surveillance system, alternative security procedures, such as additional supervisory or security agents, must be implemented immediately.
 - 2. For Tier B and C, in the event of power loss to the surveillance system, an auxiliary or backup power source must be available and capable of providing immediate restoration of power to the surveillance system to ensure that surveillance agents can observe all areas covered by dedicated cameras.
- H. The surveillance system must record an accurate date and time stamp on recorded events and the displayed date and time must not significantly obstruct the recorded view.
- I. All surveillance agents must be trained in the use of the equipment, games, and house rules in accordance to part II of this section.
- J. Each camera required by the standards in this section must be installed in a manner that will prevent it from being readily obstructed, tampered with, or disabled.
- K. The surveillance system must:
 - 1. Have the capability to display all camera views on a monitor;
 - 2. Include sufficient numbers of recording devices to record the views of all cameras required by this section;
 - 3. Record all camera views; and
 - 4. For Tier B and C only, include sufficient numbers of monitors to simultaneously display gaming and count room activities.
- L. 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.
 - 1. If a dedicated camera malfunctions, alternative security procedures, such as additional supervisory or security agents, must be implemented and the TGRA must be notified immediately.
 - 2. 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.
- M. A TGRA-approved log shall be maintained that documents each malfunction and repair of the surveillance system or any of its individual components, which will include, but is not limited to:
 - 1. Date of malfunction;
 - 2. Time of malfunction;
 - 3. Description of the malfunction;
 - 4. The date(s) of the efforts expended to repair the malfunction;
 - 5. Time(s) of the efforts expended to repair the malfunction;
 - 6. Description(s) of the efforts expended to repair the malfunction;
 - 7. Reason for any delays in repairing the malfunction;
 - 8. The date the malfunction is repaired; and
 - 9. Where applicable, document any alternate security measures required and implemented.

V. Gaming Machine Surveillance Standards:

- A. Dedicated cameras shall be placed to monitor and provide real time recorded coverage of Gaming Machines offering a payout of more than \$250,000 with:
 - 1. All customers and employees at the gaming machine; and
 - 2. The face of the gaming machine to identify the payout lines(s).
- B. Dedicated cameras shall be placed to monitor and provide real time recorded coverage of In-house progressive machines with a reset amount of \$250,000 or more with:
 - 1. All customers and employees at the gaming machine; and
 - 2. The face of the gaming machine to identify the payout line(s).
- C. Wide-area progressive machines with a reset amount of \$1 million or more shall be monitored and recorded by dedicated cameras to provide real time coverage of:
 - 1. All customers and employees at the gaming machine; and
 - 2. The face of the gaming machine to identify the payout lines(s).
- D. If any progressive machine is a multi-game machine, the TGRA or the gaming enterprise, subject to the approval of the TGRA, may develop and implement alternative procedures to verify payouts.

VI. Bingo Surveillance Standards:

- A. For manual draws, the surveillance system must monitor the cashiers and the bingo ball drawing device or mechanical random number generator, which must be recorded during the course of the draw by a dedicated camera, in real time, to identify the numbers or designations drawn.
- B. The surveillance system shall monitor and record the bingo game board and the activities of the bingo game, including drawing, and entering the balls, numbers or other designations drawn.
- C. Floor activity will be sufficiently covered to randomly monitor and record all sales by floor clerks.

VII. Card Games Surveillance Standards:

- A. Except for card game tournaments, a dedicated camera(s) with sufficient clarity must be used to provide:
 - 1. An overview of the activities on each card table surface, including card faces and cash and/or cash equivalents;
 - 2. An overview of card game activities, including patrons and dealers; and
 - 3. An unobstructed view of all posted progressive pool amounts.
- B. 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 equivalents are exchanged.

VIII. Keno Surveillance Standards:

- A. The surveillance system shall possess the capability to monitor the keno ball-drawing device and all associated equipment, or random number generator, which shall be recorded during the course of the draw by a dedicated camera, in real time, to identify the balls drawn or numbers selected.
- B. The surveillance system shall monitor and record general activities in each keno game area, in real time, to identify the employees performing the different functions.

IX. Table Games Surveillance Standards:

- A. Operations with four (4) or more table games:
 - 1. The surveillance system of gaming enterprises operating four (4) or more table games shall provide, at a minimum, one (1) pan-tilt-zoom camera per two (2) tables and surveillance must be capable of taping:
 - a. In real time, to identify customers and dealers; and
 - b. With sufficient coverage and in real time, to simultaneously view the table bank and determine the configuration of wagers, card values, and game outcome.
 - c. One (1) dedicated camera per table and one (1) pan-tilt-zoom camera per four (4) tables may be an acceptable alternative procedure to satisfy the requirements of this paragraph.
 - 2. All craps tables shall have two (2) dedicated cross view cameras covering both ends of the table.

3. All roulette areas shall have one (1) overhead-dedicated camera covering the roulette wheel and shall also have one (1) dedicated camera covering the play of the table.

X. Cage and Vault:

- A. The surveillance room shall monitor and record a general overview of activities occurring in each cage and vault area, with sufficient clarity, to identify individuals within the cage and customers and employees at the counter areas and to confirm the amount of each cash transaction.
- B. Each cashier station shall be equipped with one (1) dedicated overhead camera covering the transaction area.
- C. The cage or vault area in which exchange and transfer transactions occur must be monitored and recorded by a dedicated camera or motion activated dedicated camera that provides coverage with sufficient clarity to identify the chip values and the amounts on the exchange and transfer documentation.
 1. Controls provided by a computerized exchange and transfer system constitute an adequate alternative to viewing the amounts on the exchange and transfer documentation.

XI. Fills and Credits:

- A. The cage or vault area in which fills and credits are transacted shall be monitored and recorded by a dedicated camera or motion activated camera that provides coverage, with sufficient clarity, to identify the chip values and the amounts on the fill and credit slips.
- B. Controls provided by a computerized fill and credit system may be deemed an adequate alternative to viewing the fill and credit slips.

XII. Count Room Standards:

- A. The surveillance system shall monitor and record, with sufficient clarity, all areas where currency or coin may be stored or counted.
- B. The surveillance system must provide coverage of count equipment with sufficient clarity to view any attempted manipulation of the recorded data.
- C. Audio capability of the count room shall also be maintained.

XIII. Kiosks Standards:

- A. The Surveillance system must monitor and record a general overview of activities occurring at each kiosk with sufficient clarity to identify the activity and the individuals performing it, including maintenance, drops or fills, and redemption of wagering vouchers or credits.

XIV. Change Booth Standards:

- A. The surveillance system shall provide dedicated camera coverage capable of monitoring and recording a general overview of the activities occurring in each gaming machine change booth.

XV. Reporting Requirements:

- A. TGRA approved procedures must be implemented for reporting suspected crimes and suspicious activity.

XVI. Recording Retention:

- A. Controls must be established and procedures implemented that include the following:
 1. All recordings in this section shall be retained for a minimum of fourteen (14) days.
 2. Suspected crimes, suspicious activity, patron disputes, gaming machine malfunctions or detentions by security agents discovered with the initial retention period must be copied and retained until written approval to release them has been provided by the TGRA.
- B. The TGRA shall be provided the original or a duly authenticated copy of recording(s) for evidentiary purposes, when requested.

XVII. Surveillance Logs:

- A. Logs must be maintained and demonstrate the following:
 - 1. Compliance with the storage, identification, and retention standards required in this section;
 - 2. Each malfunction and repair of the surveillance system as defined in this section; and
 - 3. Activities performed by surveillance agents as required by the controls in this section.
- B. Such log shall be maintained by surveillance room personnel and shall be stored securely within the surveillance department.
- C. At a minimum, the following information shall be recorded in the surveillance log:
 - 1. Date;
 - 2. Time commenced and terminated;
 - 3. Activity observed or performed; and
 - 4. The name and license credential number of each person who initiates, performs, or supervises the surveillance.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 13:

Tribal Internal Control Standards for Keno

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. Game Play Standards:

- A. The computerized customer ticket shall include the date, game number, ticket sequence number, station number, and conditioning (including multi-race if applicable).
- B. The information on the ticket shall be recorded on a restricted transaction log or computer storage media concurrently with the generation of the ticket.
- C. Keno personnel shall be precluded from having access to the restricted transaction log or computer storage media.
- D. When it is necessary to void a ticket, the void information shall be inputted in the computer and the computer shall document the appropriate information pertaining to the voided wager (e.g. void slip is issued or equivalent documentation is generated).
- E. Controls shall exist to prevent the writing and voiding of tickets after a game has been closed and after the number selection process for that game has begun.
- F. The controls in effect for tickets prepared in outstations (if applicable) shall be identical to those in effect for the primary keno game.

IV. Rabbit Ear or Wheel System:

- A. The following standards shall apply if a rabbit ear or wheel system is utilized.
 - 1. A dedicated camera shall be utilized to monitor the following, both prior to and subsequent to, the calling of a game.
 - a. Empty rabbit ears or wheel;
 - b. Date and time;
 - c. Game number; and
 - d. Full rabbit ears or wheel.
 - 2. The film of the rabbit ears or wheel shall provide a legible identification of the numbers on the balls drawn.
 - 3. Keno personnel shall immediately input the selected numbers in the computer and the computer shall document the date, the game number, the time the game was closed, and the numbers drawn.
 - 4. The TGRA or the gaming enterprise, as approved by the TRGA, shall establish and the gaming enterprise shall comply with procedures that prevent unauthorized access to keno balls in play.
 - 5. Back-up keno ball inventories shall be secured in a manner to prevent unauthorized access.
 - 6. The TGRA or the gaming enterprise, as approved by the TRGA, shall establish and the gaming enterprise shall comply with procedures for inspecting new keno balls put into play as well as for those in use.

V. Random Number Generator:

- A. The following standards shall apply if a random number generator is utilized.
1. The random number generator shall be linked to the computer system and shall directly relay the numbers selected into the computer without manual input.
 2. Keno personnel shall be precluded from access to the random number generator.

VI. Winning tickets:

- A. Winning tickets shall be verified and paid as follows:
1. The sequence number of tickets presented for payment shall be inputted into the computer and the payment amount generated by the computer shall be given to the customer.
 2. The TGRA or the gaming enterprise, as approved by the TGRA, shall establish and the gaming enterprise shall comply with procedures that preclude payment on tickets previously presented for payment, unclaimed winning tickets (sleepers) after a specified period of time, voided tickets, and tickets that have not been issued yet.
 3. All payouts shall be supported by the customer (computer-generated) copy of the winning ticket (payout amount is indicated on the customer ticket or a payment slip is issued).
 4. A manual report or other documentation shall be produced and maintained documenting any payments made on tickets that are not authorized by the computer.
 5. 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:
 - a. Approval of management personnel independent of the keno department, evidenced by their signature;
 - b. 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);
 - c. Comparison of the winning customer copy to the computer reports;
 - d. Regarding of the customer copy using the payout schedule and draw information; and
 - e. Documentation and maintenance of the procedures in this paragraph.
 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.

VII. Check-out Standards at the End of Each Keno Shift:

- A. For each writer station, a cash summary report (count sheet) shall be prepared that includes:
1. Computation of net cash proceeds for the shift and the cash turned in; and
 2. Signatures and employee numbers of two employees who have verified the net cash proceeds for the shift and the cash turned in.
- B. Unverified transfers of cash and/or cash equivalents are prohibited.

VIII. Promotional Payouts or Awards:

- A. If a gaming enterprise offers promotional payouts or awards, the payout form/documentation shall include the following:
1. Date and time;
 2. Dollar amount of payout or description of personal property (e.g., jacket, toaster, car, etc.), including fair market value;
 3. Type of promotion; and
 4. Signature and employee number of at least one employee authorizing and completing the transaction.

IX. Standards for Statistical Reports:

- A. Records shall be maintained that include win and write by individual writer for each day.
- B. Records shall be maintained that include win, write, and win-to-write hold percentage for:

1. Each shift;
 2. Each day;
 3. Month-to-date; and
 4. Year-to-date or fiscal year-to-date as applicable.
- C. A manager independent of the keno department shall review keno statistical data at least on a monthly basis and investigate any large or unusual statistical variances.
- D. 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 enterprise's win percentage for the previous business year or the previous twelve (12) months.
- E. Such investigations shall be documented, maintained for inspection, and provided to the TGRA upon request.

X. System Security Standards:

- A. A department independent of the keno function shall control all keys (including duplicates) to sensitive computer hardware in the keno area.
- B. Security shall accompany such keys to the keno area and shall observe changes or repairs each time the sensitive areas are accessed.

XI. Documentation Standards:

- A. Adequate documentation of all pertinent keno information shall be generated by the computer system.
- B. This documentation shall be restricted to authorized personnel.
- C. The documentation shall include, at a minimum:
1. Ticket information (as described in paragraph III.A of this section);
 2. Payout information (date, time, ticket number, amount, etc.);
 3. Game information (number, ball draw, time, etc.);
 4. Daily recap information, including:
 - a. Write
 - b. Payouts; and
 - c. Gross revenue (win).
 5. System exception information, including:
 - a. Voids;
 - b. Late pays;
 - c. Appropriate system parameter information (e.g., changes in pay tables, ball draws, payouts over a predetermined amount, etc.); and
 6. Personnel accessing listing, including:
 - a. Employee name and employee number; and
 - b. Listing of functions employee can perform or equivalent means of identifying same.

XII. Keno Audit Standards:

- A. The keno audit function shall be independent of the keno department.
- B. At least annually, keno audit shall foot the write on the restricted copy of the keno transaction report for a minimum of one shift and compare the total to the total as documented by the computer.
- C. For at least one shift every other month, keno audit shall perform the following:
 1. Foot the customer copy of the payouts and trace the total to the payout report; and
 2. Regrade at least 1% of the winning tickets using the payout schedule and draw ticket.
- D. Keno audit shall perform the following:
 1. For a minimum of five (5) games per week, compare the video recording and/or digital record of the rabbit ears or wheel to the computer transaction summary;
 2. Compare net cash proceeds to the audited win/loss by shift and investigate any large cash overages or shortages (i.e., in excess of \$25.00);
 3. Review and Regrade all winning tickets greater than or equal to \$1,500, including all forms that document that proper authorizations and verifications were obtained and performed;
 4. Review the documentation for payout adjustments made outside the computer and investigate large and frequent payments;
 5. Review personnel access listing for inappropriate functions an employee can perform;

6. Review system exception information on a daily basis for propriety of transactions and unusual occurrences including changes to the personnel access listing;
 7. If a random number generator is used, then at least weekly review the numerical frequency distribution for potential patterns; and
 8. Investigate and document results of all noted improper transactions or unusual occurrences.
- E. When the keno game is operated by one person:
1. The customer copies of all winning tickets in excess of \$100 and at least 5% of all other winning tickets shall be regraded and traced to the computer payout report;
 2. The video recording and/or digital record of rabbit ears or wheel shall be randomly compared to the computer game information report for at least 10% of the games during the shift; and
 3. Keno audit personnel shall review winning tickets for proper authorization pursuant to paragraph VI.6 of this section.
- F. In the event any person performs the writer and deskman functions on the same shift, the procedures described in paragraphs XI.E.1. and XI.E.2 of this section (using the sample sizes indicated) shall be performed on tickets written by that person.
- G. Documentation (e.g., a log, checklist, etc.) that evidences the performance of all keno audit procedures shall be maintained.
- H. 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 TGRA upon request.
- I. When a multi-game ticket is part of the sample in paragraph XI.E.1 and XI.F of this section, the procedures may be performed for ten (10) games or ten percent (10%) of the games won, whichever is greater.

XIII. Access:

- A. Access to the computer system shall be adequately restricted (i.e., passwords are changed at least quarterly, access to computer hardware is physically restricted, etc.).

XIV. Equipment Standards:

- A. There shall be effective maintenance planned to service keno equipment, including computer program updates, hardware servicing, and keno ball selection equipment (e.g., service contract with lessor).
- B. Keno equipment maintenance (excluding keno balls) shall be independent of the operation of the keno game.
- C. Keno maintenance personnel shall report irregularities to management personnel independent of the keno department.
- D. If the gaming operation utilizes a barcode or microchip reader in connection with the play of keno, personnel independent of the keno department shall test the reader at least annually to determine that it is correctly reading the barcode or microchip.

XV. Document Retention:

- A. All documents (including computer storage media) discussed in this section shall be retained for five (5) years, except for the following, which shall be retained for at least seven (7) days:
 1. Video recordings and/or digital records of rabbit ears or wheel;
 2. All copies of winning keno tickets of less than \$1,500.00;

XVI. Multi-race Tickets:

- A. Procedures shall be established to notify keno personnel immediately of large multi-race winners to ensure compliance with the standards in paragraph VI.A.5 of this section.
- B. Procedures shall be established to ensure that keno personnel are aware of multi-race tickets still in process at the end of a shift.

XVII. Manual Keno:

- A. For gaming enterprises that conduct manual keno games, alternate procedures that provide at least the level of control described by the standards of this section shall be developed and maintained.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 14:

Tribal Internal Control Standards for Title 31

I. Documentation Standards:

- A. All handwritten forms shall be completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error and writing the correct information above or below the error, and then initialing the correction.

II. General:

- A. The gaming enterprise shall have a Title 31 Compliance Officer, whose responsibilities include, but are not limited to:
 - 1. Audit of Title 31 documents;
 - 2. Timely filing of appropriate Title 31 reports; and
 - 3. Developing and implementing Title 31 training for all gaming enterprise properties, to include training for all gaming departments' new employees and documented annual refresher training for all gaming departments' employees.
- B. The gaming enterprise shall develop and implement a written program reasonably designed to assure and monitor compliance with the requirements set forth in this section.
- C. At a minimum, each compliance program shall provide for:
 - 1. A system of internal controls to assure ongoing compliance;
 - 2. Internal and/or external independent testing for compliance;
 - 3. Training of casino personnel, including training in the identification of unusual or suspicious transactions, to the extent that the reporting of such transactions is hereafter required by this section, by other applicable laws or regulations, or by the gaming enterprise's own administrative and compliance policies;
 - 4. An individual or individuals to assure day-to-day compliance;
 - 5. Procedures for using all available information to determine:
 - a. The name, address, social security number, and other information and verification of the same, of a person;
 - b. The occurrence of unusual or suspicious transactions; and
 - c. Whether any record must be made and retained.
 - 6. The use of automated programs to aid in assuring compliance.
- D. The gaming enterprise shall form a Title 31 Review Committee which shall consist of a representative of each gaming department and a representative from Revenue Audit and which shall meet monthly to review all training, policies and procedures

III. Gaming Enterprise Casino Properties:

- A. Each gaming enterprise casino property shall file a report of each transaction in currency, involving either cash in or cash out, of \$3,000 or more.
 - 1. Transactions in currency involving cash in include, but are not limited to:
 - a. Purchases of chips, tokens, and other gaming instruments;
 - b. Front money deposits;
 - c. Safekeeping deposits;
 - d. Bets of currency;
 - e. Currency received by a casino for transmittal of funds through wire transfer for a customer;
 - f. Purchases of a casino's check;
 - g. Exchanges of currency for currency, including foreign currency; and

- h. Bills inserted into electronic devices.
- 2. Transactions in currency involving cash out include, but are not limited to:
 - a. Redemptions of chips, tokens, and gaming instruments;
 - b. Front money withdrawals;
 - c. Safekeeping withdrawals;
 - d. Payments on bets;
 - e. Payments by a casino to a customer based on receipt of funds through wire transfer;
 - f. Cashing of checks or other negotiable instruments; and
 - g. Exchange of currency for currency, including foreign currency.
- B. Each gaming enterprise property shall treat multiple currency transactions as a single transaction if the property has knowledge that they are by or on behalf of any person and result in either cash in or cash out totaling more than \$3,000 during any gaming day. The gaming enterprise property shall be deemed to have the knowledge described in the preceding sentence if any gaming enterprise property employee, acting within the scope of his/her employment, has knowledge that such multiple transactions have occurred, including knowledge 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 gaming enterprise property maintains pursuant to any law or within the ordinary course of its business, and which contain information that such multiple currency transactions have occurred.

IV. Table Games and Card Games Departments:

- A. All Table Games and Card Games dealers must receive training in Title 31 regulations and reporting requirements before they begin work.
 - 1. All Table Games and Card Games dealers and supervisors must know the types of transactions that must be tracked and logged:
 - a. Cash in of \$3,000 or more as described in III.A.1 of this Section; and
 - b. Cash out of \$3,000 or more as described in III.A.2 of this Section
- B. Table Games and Card Games dealers shall report all transactions that are logged to the pit supervisor or boxman.
- C. When an unknown patron's activity requires recording on a multiple transaction log, the supervisor recording the information shall contact surveillance and request a photo of the patron.
- D. The following information shall be recorded on the multiple transaction logs used in the Table Games and Card Games Department:
 - 1. Time;
 - 2. Date;
 - 3. Patron's Name;
 - 4. Patron's Description;
 - 5. Transaction Information;
 - 6. Dealer's Initials and ID Number; and
 - 7. Supervisor's Signature and ID Number.
- E. At shift change, all logs-in-process shall be reviewed by the on-coming pit supervisor so that additional transactions can be recorded for the correct gaming patron.
- F. The pit supervisor shall monitor the transaction logs to determine if the aggregate cash activity is approaching the level for CTR (FINCEN FORM 103) reporting.
- G. When a reportable transaction occurs, the Table Games and Card Games supervisor shall be responsible for completing the CTR (FINCEN FORM 103), obtaining the following information:
 - 1. The patron's name;
 - 2. The patron's permanent address; and
 - 3. The patron's social security number.
- H. The patron's identity shall be verified by examining a picture ID.
- I. The pit supervisor shall terminate the transaction which triggered the report if adequate information is not provided by the patron.
- J. If adequate information is not provided, the pit supervisor shall file a suspicious activity report on the terminated transaction.
- K. The gaming enterprise shall develop policies and procedures, approved by the TGRA, to track down the necessary information to complete a CTR (FINCEN FORM 103) in the event that currency transactions are not properly tracked and a patron exceeds \$10,000 in a gaming day.

- L. The Table Games and Card Games supervisor shall have quick access to a copy of Title 31 information.
- M. If a patron's aggregate cash activity is about to exceed \$10,000, and the patron refuses to provide the necessary identification information, the casino shall file a Suspicious Activity Report for Casinos.

V. Gaming Machines Department:

- A. All gaming machines department employees, with the exception of gaming machine technicians, must receive training in Title 31 regulations and reporting requirements before they begin work.
 - 1. All gaming machines employees must know the types of transactions that must be tracked and logged:
 - a. Cash in of \$3,000 or more as described in III.A.1 of this Section; and
 - b. Cash out of \$3,000 or more as described in III.A.2 of this Section
- B. When an unknown patron's activity requires recording on a multiple transaction log, the supervisor recording the information shall contact surveillance and request a photo of the patron
- C. Gaming Machines employees shall report all transactions that are logged to a supervisor.
- D. The following information shall be recorded on the multiple transaction logs used in the Gaming Machines Department:
 - 1. Time;
 - 2. Date;
 - 3. Patron's Name;
 - 4. Patron's Description;
 - 5. Transaction Information;
 - 6. Employee's Initials and ID Number; and
 - 7. Supervisor's Signature and ID Number.
- E. At shift change, all logs-in-process shall be reviewed by the on-coming supervisor so that additional transactions can be recorded for the correct gaming patron.
- F. The supervisor shall monitor the transaction logs to determine if the aggregate cash activity is approaching the level for CTR (FINCEN FORM 103) reporting.
- G. When a reportable transaction occurs, the gaming machines supervisor shall be responsible for completing the CTR (FINCEN FORM 103), obtaining the following information:
 - 1. The patron's name;
 - 2. The patron's permanent address; and
 - 3. The patron's social security number.
- H. The patron's identity shall be verified by examining a picture ID.
- I. The gaming machines supervisor shall terminate the transaction which triggered the report if adequate information is not provided by the patron.
- J. If adequate information is not provided, the gaming machines supervisor shall file a suspicious activity report on the terminated transaction.
- K. The gaming enterprise shall develop policies and procedures, approved by the TGRA, to track down the necessary information to complete a CTR (FINCEN FORM 103) in the event that currency transactions are not properly tracked and a patron exceeds \$10,000 in a gaming day.
- L. The Gaming Machines supervisor shall have quick access to a copy of Title 31 information.
- M. If a patron's aggregate cash activity is about to exceed \$10,000, and the patron refuses to provide the necessary identification information, the gaming enterprise shall file a Suspicious Activity Report for Casinos.

VI. Cage Department

- A. All cage department employees must receive training in Title 31 regulations and reporting requirements before they begin work.
 - 1. All cage employees must know the types of transactions that must be tracked and logged:
 - a. Cash in of \$3,000 or more as described in III.A.1 of this Section; and
 - b. Cash out of \$3,000 or more as described in III.A.2 of this Section
- B. When an unknown patron's activity requires recording on a multiple transaction log, the supervisor recording the information shall contact surveillance and request a photo of the patron
- C. Cage employees shall report all transactions that are logged to a supervisor.
- D. The following information shall be recorded on the multiple transaction logs used in the Cage Department:

1. Time;
 2. Date;
 3. Patron's Name;
 4. Patron's Description;
 5. Transaction Information;
 6. Employee's Initials and ID Number; and
 7. Supervisor's Signature and ID Number.
- E. At shift change, all logs-in-process shall be reviewed by the on-coming supervisor so that additional transactions can be recorded for the correct gaming patron.
- F. The supervisor shall monitor the transaction logs to determine if the aggregate cash activity is approaching the level for CTR (FINCEN FORM 103) reporting.
- G. When a reportable transaction occurs, the cage supervisor shall be responsible for completing the CTR (FINCEN FORM 103), obtaining the following information:
1. The patron's name;
 2. The patron's permanent address; and
 3. The patron's social security number.
- H. The patron's identity shall be verified by examining a picture ID.
- I. The cage supervisor shall terminate the transaction which triggered the report if adequate information is not provided by the patron.
- J. If adequate information is not provided, the cage supervisor shall file a suspicious activity report on the terminated transaction.
- K. The gaming enterprise shall develop policies and procedures, approved by the TGRA, to track down the necessary information to complete a CTR (FINCEN FORM 103) in the event that currency transactions are not properly tracked and a patron exceeds \$10,000 in a gaming day.
- L. The cage supervisor shall have quick access to a copy of Title 31 information.
- M. If a patron's aggregate cash activity is about to exceed \$10,000, and the patron refuses to provide the necessary identification information, the gaming enterprise shall file a Suspicious Activity Report for Casinos.

VII. Surveillance Department

- A. The surveillance department shall, upon request of the cage, table games, or gaming machines departments, obtain a clear photograph of a patron whose activity requires completion of a Multiple Transaction Log or a Currency Transaction Report for casinos.
- B. The surveillance agent who receives the request shall enter the following information on the daily log:
1. Time of request
 2. Name of employee making request
 3. Name of department making request
 4. Patron's name
 5. Patron's account #, if known
- C. The surveillance agent shall note the following on the back of the photograph:
1. Patron name
 2. Activity location
 3. Employee name
 4. Department
- D. Photos shall be picked up from surveillance before the end of the gaming day or turned into the Title 31 clerk.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 15:

Tribal Internal Control Standards for Annual Facility Licensing and Health & Safety

I. Facility Licensing Standards:

- A. At least annually the TGRA shall issue a separate license to each place, facility, or location on Indian lands where class II or class III gaming will occur, certifying the following:
 - 1. The construction and maintenance of the gaming facility adequately protects the environment and the public health and safety.
 - 2. Gaming is conducted in a manner which adequately protects the environment and the public health and safety.
- B. A copy of such license shall be submitted to the Commission.
- C. A copy of the table of contents for each of the standards spelled out in this section shall be submitted to the Commission.

II. Emergency Preparedness:

- A. Each gaming facility shall have an evacuation plan.
- B. Emergency map routes shall be posted.
- C. Occupancy limit signs shall be posted in each gaming facility.
- D. Each gaming facility shall conduct documented fire drills or mock emergency evacuations with employees.
- E. Each gaming facility shall have a fire alarm system.
- F. Each gaming facility shall have a sprinkler system.
- G. Each gaming facility shall have smoke detectors.
- H. Each gaming facility shall have fire exits.
- I. Fire exits shall be freely accessible and easily opened for the interior.
- J. Each gaming facility shall have fire extinguishers.
 - 1. Fire extinguishers shall be tested quarterly by staff of each gaming facility.
 - 2. Employees shall be trained in the use of the fire extinguisher.
- K. Each gaming facility shall have sufficient source of power for emergency lighting.
- L. Each gaming facility shall have first-aid kits available.
- M. Each gaming facility shall make arrangements for the following response.
 - 1. Fire;
 - 2. EMT; and
 - 3. Police.

III. Food and Water:

- A. Each gaming facility shall have its own potable water supply.
- B. Each gaming facility shall train employees in food handling and hygienic practices.
- C. Each gaming facility shall have an inspection and testing program.

IV. Construction and Maintenance:

- A. Each gaming facility shall be constructed in accordance with building, plumbing, electrical and mechanical codes.
- B. Each gaming facility shall know the approximate age of the each gaming facility and year it was constructed.
- C. Each gaming facility shall have a maintenance and inspection schedule in place for heating and air conditioning systems.
- D. Each gaming facility shall manage storm water on-site.

V. Hazardous and Other Materials (paints, solvents pesticides, cleaning agents, and fuels):

- A. Each gaming facility shall have procedures approved by TGRA for handling hazardous materials.
- B. Each gaming facility shall train employees on use and handling of hazardous materials.
- C. Each gaming facility shall have procedures approved by TGRA for disposal for materials.
- D. Each gaming facility shall have Material Safety Data Sheets (MSDS) accessible.

VI. Sanitation:

- A. Each gaming facility shall have approved wastewater treatment.
 - 1. Gaming facility wastewater shall be treated onsite or properly disposed of by a local government or private company.
- B. Each gaming facility shall have a biohazard disposal program in place.
- C. Each gaming facility shall have approved methods to dispose of solid waste.
- D. Each gaming facility shall have recycling and/or pollution prevention programs in place.

PUEBLO OF LAGUNA
TRIBAL GAMING REGULATORY AUTHORITY
GAMING ENTERPRISE TRIBAL MINIMUM INTERNAL CONTROL STANDARDS

Section 16:

Tribal Internal Control Standards for Casino Administration

I. Documentation Standards:

- A. All handwritten forms shall be legibly completed in black ink only.
- B. Signatures or initials must include gaming license number.
- C. Corrections to all errors must be made by drawing a single line through the error, writing the correct information above or below the error, and then initialing the correction.

II. Computer Applications:

- 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 TGRA, will be acceptable.

III. NIGC Fees:

- A. The gaming enterprise shall calculate and submit the NIGC fees per §514.1 of the NIGC Minimum Internal Control Standards.
- B. The gaming enterprise shall forward to the TGRA a copy of all payments to the NIGC and any additional supporting documentation that was used in the calculation immediately after payment is made.

IV. New Mexico State Compact Revenue Sharing Agreement:

- A. The gaming enterprise shall calculate the New Mexico Revenue Sharing payment amounts in accordance with the current Tribal-State Class III Gaming Compact.
- B. The gaming enterprise shall forward to the TGRA a copy of all payments to the State of New Mexico and any additional supporting documentation that was used in the calculation immediately after payment is made.

V. New Mexico State Compact Regulatory Fee Agreement:

- A. The gaming enterprise shall calculate the New Mexico Regulatory payment amounts in accordance with the current Tribal-State Class III Gaming Compact.
- B. The gaming enterprise shall forward to the TGRA a copy of all payments to the State of New Mexico and any additional supporting documentation that was used in the calculation immediately after payment is made.

VI. Responsible Gaming

- A. The gaming enterprise shall calculate the New Mexico responsible gaming payment amounts in accordance with the current Tribal-State Class III Gaming Compact.
- B. The gaming enterprise shall develop procedures, approved by the TGRA, documenting timely responsible gaming expenditures.
- C. The gaming enterprise shall forward to the TGRA a copy of all payments to responsible gaming support programs and any additional supporting documentation used in the calculation.

VII. Tribal Regulatory Fee Payment to POL:

- A. The gaming enterprise shall calculate the Tribal Regulatory Fee payment amount per §11.C.c of the Tribal-State Class III Gaming Compact (2007).

- B. The gaming enterprise shall forward to the TGRA a copy of all payments to the Pueblo of Laguna and any additional supporting documentation that was used in the calculation, within five (5) working days of the due date of the fees.

VIII. Independent Auditor and Reporting Requirements:

- A. An independent certified public accountant (CPA) shall be engaged annually to perform procedures to verify, on a test basis, that the gaming enterprise is in material compliance with the TGRA Gaming Enterprise Internal Controls.
- B. No later than 60 days prior to the end of the fiscal year, the gaming enterprise shall provide the TGRA with a list of independent audit firms invited to submit proposals for the fiscal year audit, the responses to the request for proposal, and a brief statement explaining the rationale for the selection of the independent audit firm to be engaged for the audit.
- C. The TGRA shall receive a copy of the independent CPA firm's engagement letter. The procedures may be performed in conjunction with the annual financial audit. The CPA shall report its findings to the Tribe, TGRA, and management, within 120 days of the gaming enterprise fiscal year end. The gaming enterprise or the CPA shall forward to the TGRA, no less than ten (10) complete sets of documentation, to include:
 - 1. The audited financial statements;
 - 2. The management letter;
 - 3. The report of compliance with the TGRA Gaming Enterprise Internal Controls; and
 - 4. Written verification of the accuracy of the quarterly New Mexico Compact Revenue Sharing net win calculation.
- D. Annual reports of audit reviews described in A. above, shall include the following information:
 - 1. Audit objectives;
 - 2. Audit procedures and scope;
 - 3. Findings and conclusions;
 - 4. Recommendations, if applicable; and
 - 5. Management's response.

IX. Accounting Standards:

- A. When establishing SICS, the gaming operation should review, and consider incorporating, other external standards such as GAAP, GAAS, and standards promulgated by GASB and FASB. In the event of a conflict between the MICS and the incorporated external standards, the external standards prevail.
- B. Controls must be established and procedures implemented to safeguard assets and ensure each gaming operation:
 - 1. Prepares accurate, complete, legible, and permanent records of all transactions pertaining to gaming revenue and activities for operational accountability.
 - 2. Prepares general accounting records on a double-entry system of accounting, maintaining detailed, supporting, subsidiary records, and performs the following activities:
 - a. Record gaming activity transactions in an accounting system to identify and track all revenues, expenses, assets, liabilities, and equity;
 - b. Record all markers, IOU's, returned checks, held checks, or other similar credit instruments;
 - c. Record journal entries prepared by the gaming operation and by any independent accountants used;
 - d. Prepare income statements and balance sheets;
 - e. Prepare appropriate subsidiary ledgers to support the balance sheet;
 - f. Prepare, review, and maintain accurate financial statements;
 - g. Prepare transactions in accordance with the appropriate authorization, as provided by management;
 - h. Record transactions to facilitate proper recording of gaming revenue and fees, and to maintain accountability of assets;
 - i. Compare recorded accountability for assets to actual assets at periodic intervals, and take appropriate action with respect to any variances;
 - j. Segregate functions, duties, and responsibilities;
 - k. Prepare minimum bankroll calculations; and
 - l. Maintain and preserve all financial records and relevant supporting documentation.

- C. Controls must be established and procedures implemented to ensure that:
1. Internal auditor(s) perform audits of each department of a gaming operation, at least annually, to review compliance with TICS, SICS, and these MICS, which include at least the following areas:
 - a. Bingo, including supervision, bingo cards, bingo card sales, draw, prize payout; cash and equivalent controls, technologic aids to the play of bingo, operations, vouchers, and revenue audit procedures;
 - b. Pull tabs, including, supervision, pull tab inventory, pull tab sales, winning pull tabs, pull tab operating funds, statistical records, and revenue audit procedures;
 - c. Card games, including supervision, exchange or transfers, playing cards, shill funds, reconciliation of card room bank, posted rules, and promotional progressive pots and pools;
 - d. Table games, including fill and credit procedures; location and control over sensitive keys; and tracing source documents to summarized documentation and accounting records and reconciliation to restricted copies.
 - e. Gaming Machines, including, jackpot payout and gaming machine fill procedures (if applicable); tracing of source documents to summarized documentation and accounting records; reconciliation to restricted copies; location and control over sensitive keys; and compliance with TICS procedures for gaming machines that accept currency or coin(s) and issue cash-out tickets or gaming machines that do not accept currency or coin(s) and do not return currency or coin(s);
 - f. Gaming promotions and player tracking procedures, including supervision, gaming promotion rules and player tracking systems;
 - g. Complimentary services or items, including procedures for issuing, authorizing, redeeming, and reporting complimentary service items;
 - h. Drop and count standards, including supervision, count room access, count team, card game drop standards, player interface and financial instrument drop standards, card game count standards, player interface financial instrument count standards, and controlled keys;
 - i. Cage, vault, cash and cash equivalent procedures, including supervision, cash and cash equivalents, personal checks, cashier's checks, traveler's checks, payroll checks, and counter checks, cage and vault accountability, kiosks, patron deposited funds, promotional payouts, drawings, and giveaway programs, chip and token standards, and cage and vault access;
 - j. Information technology, including supervision, gaming system logical and physical controls, independence, physical security, logical security, user controls, installations and/or modifications, remote access, incident monitoring and reporting, data back-ups, software downloads, and verifying downloads;
 - k. Surveillance, including supervision, surveillance equipment and control room standards, surveillance over gaming machines, bingo, card games, table games; cage and vault, fills and credits, count room, kiosks, change booths, and surveillance logs;
 - l. Accounting standards, including accounting records, maintenance and preservation of financial records and relevant supporting documentation; and
 - m. Any other internal audits as required by the Tribe, TGRA, audit committee or other entity designated by the Tribe.
 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).
 3. Internal auditor(s) report directly to the Tribe, TGRA, audit committee, or other entity designated by the Tribe.
 4. Documentation such as checklists, programs, reports, etc. is prepared to evidence all internal audit work and follow-up performed as it relates to compliance with TICS, SICS, and the NIGC MICS, including all instances of noncompliance.
 5. Audit reports are maintained and made available to the Commission upon request and must include the following information:
 - a. Audit objectives;
 - b. Audit procedures and scope;
 - c. Findings and conclusions;
 - d. Recommendations, if applicable; and

- e. Management's response.
 - 6. All material exceptions identified by internal audit work are investigated and resolved and the results are documented.
 - 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.
 - 8. Follow-up observations and examinations is performed to verify that corrective action has been taken regarding all instances of non-compliance. The verification is performed within six (6) months following the date of notification of non-compliance.
 - 9. Whenever possible, internal audit observations shall be performed on an unannounced basis (i.e. without the employees being forewarned that their activities will be observed).
- D. Annual requirements:
- 1. Agreed upon procedures. A CPA must be engaged to perform an assessment to verify whether the gaming operation is in compliance with the NIGC MICS, and/or the TICS or SICS if they provide at least the same level of controls as the Class II 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.
 - 2. The tribe must submit two copies of the agreed-upon procedures report to the Commission within 120 days of the gaming operation's fiscal year end in conjunction with the submission of the annual financial audit report required pursuant to 25 CFR Part 571.
 - 3. Review of internal audit.
 - a. The CPA must determine compliance by the gaming operation with the internal audit requirements in this paragraph (D) by:
 - i. Completing the internal audit checklist;
 - ii. Ensuring that the internal auditor completed checklists for each gaming department of the operation;
 - iii. Verifying that any areas of non-compliance have been identified;
 - iv. Ensuring that audit reports are completed and include responses from management; and
 - v. Verifying that appropriate follow-up on audit findings has been conducted and necessary corrective measures have been taken to effectively mitigate the noted risks.
 - b. If the CPA determines that the internal audit procedures performed during the fiscal year have been 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 standards covered by this part.
 - 4. Report format. The SSAEs are applicable to agreed-upon procedures engagements required in this part. All noted instances of noncompliance with the MICS and/or the TICS or SICS, if they provide the same level of controls as the MICS, must be documented in the report with a narrative description, the number of exceptions and sample size tested.

X. Variance Standards:

- A. The Gaming Enterprise shall submit all requests for variances to the TGRA for approval.
- B. For all approved variances, the TGRA shall submit to the Chairman of the NIGC, within 30 days, a detailed report which shall include the following:
 - 1. A detailed description of the variance;
 - 2. An explanation of how the variance achieves a level of control sufficient to accomplish the purpose of the standard it is to replace; and
 - 3. Evidence that the TGRA has approved the variance.